

# **Draft Bracknell Forest Local Plan**

## **Draft Summary of responses to the Consultation on the Revised Growth strategy and Development Management Policies**

## Introduction to Draft Responses Document

This document contains draft summaries of the main issues raised in response to the consultation on the Draft Bracknell Forest Local Plan Revised Growth Strategy consultation which took place between 25 October and 6 December 2019.

We are giving respondents to the earlier consultation the opportunity to check whether the **main issues** raised in their representations have been appropriately identified. This informal focused consultation will run from: Friday 6th March until 5pm on Friday 21st March.

At this stage we are not inviting additional/new comments on the content of the Draft Plan. If you have any comments to make on the accuracy of the factual summaries, please send them to: [development.plan@bracknell-forest.gov.uk](mailto:development.plan@bracknell-forest.gov.uk).

Comments are structured by the chapter headings and policies as they appeared within the Draft Local Plan (Part 1 – Strategic: Revised Growth Strategy and Part 2 - Non Strategic: Development Management Policies).

Comments have been sub divided into three categories within each section of the Draft Plan:

- Statutory consultees and duty to co-operate bodies
- Residents and other local organisations/groups
- Developers/promoters of sites

Within each category, the respondent is identified by either the surname of an individual, or the name of the group/organisation. 'ID' reference numbers are also included, which relate to the reference number of the comments generated by our consultation database.

Sections of the document can be accessed using the contents pages below.

Individuals/groups/organisations can also be searched within the document by using 'Control' and 'F' keys on a keyboard, which will bring up a search window.

## Next stage

The Council is currently considering the content of the comments received and carrying out further technical work, prior to finalising the Pre Submission version of the Local Plan. This will then be subject to a statutory consultation of 6 weeks, later this year, when the Council will be seeking views on whether the Local Plan is legally compliant and meets the tests of 'soundness', as set out in the National Planning Policy Framework (NPPF).

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## **PART 1 – Strategic Revised Growth Strategy**

### **General**

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
Transport for London (019)	No comments.
National Grid (074)	No comments.
South East Water (SE) (104)	<p>SE Water's most recent business plan commits an active role regionally in relation to the impact of housing growth on water.</p> <p>Preferred plan for the period 2020 to 2025 includes a mix of demand management initiatives such as leakage reductions and an ambitious water efficiency programme. During the period 2025 to 2045 we will continue our demand management initiatives to achieve further leakage and water efficiency savings.</p> <p>In resource zone WRZ4 area (Bracknell) targeted catchment management programmes are being developed: Woodgarston area would see the benefits by 2035 (have agreed with Affinity Water a temporary reduction on the Egham to Surrey Hills transfer for a period of 5 years from 2025 onwards). Keleher treatment works expansion at Bray due to be complete by April 2020 which would see the capacity of the treatment plan to produce from up to 45 million litres of clean drinking water every day to up to 68 million litres.</p> <p>Specific comments also made on certain policies.</p>
Rushmoor Borough Council (248)	No comments.
Old Windsor Parish Council (264)	Concerns regarding tragic congestion likely to be added to the A308. (Area already becomes gridlocked in issues on the M4/M25). Associated impacts of air and noise pollution.
Heathrow Airport Ltd (309)	No comments.
Surrey County Council (327)	<p>Key concern relates to the cumulative cross boundary impacts on Surrey's road network: Meadows gyratory (which has been recently remodelled), the A30 towards Camberley and the A331.</p> <p>Also concerns regarding cumulative cross boundary impacts relating to air quality.</p> <p>These matters need to be assessed to meet the duty to co-operate.</p> <p>Highways England are also due to undertake a study of the M3 J3, any cumulative highway impacts should be taken into account as part of this work, and any mitigation agreed with Surrey.</p>
South Oxfordshire District Council (580)	<p>No comments to make on approach and content of the documents.</p> <p>Welcome the importance of neighbourhood planning, and breakdown by neighbourhood areas.</p> <p>Welcomes greater emphasis within the plan relating to climate change.</p>
Winkfield Parish Council (894)	Concerned no consultation exhibition held in Winkfield Parish. Consider that BFC has assumed because only 2% proposed in parish will be no interest. Disappointed at this assumption. Consider all sites will have some effect on parish; 'Garden Settlement' a dramatic effect.
879 Royal Borough of Windsor and Maidenhead	Concerned BFC not fulfilling the Duty to Cooperate requirements in relation to proposed allocation at Jealott's Hill; considerable further work needed in terms of justification and cross-boundary working. Further extensive cross boundary discussions are requested.
879 Royal Borough of Windsor and Maidenhead	Questions if Duty to Cooperate discussions have taken place with other authorities i.e. Slough to ascertain whether or not Jealott's Hill allocation is over-provision of housing and could meet unmet need of other areas.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
	<b>Support</b>
033 Kasaska	New Plan is more balanced and sensible – commend the Council
211 Carter	Support the plan.
	<b>Consultation process</b>
019 Leach	Insufficient events to cater for people who work full time – no weekend events or late weekday evenings.
035 Brosh	Clear explanations.
110 Norman, 111 Norman	This proposal was also sent out during a General Election period so MP's are not currently available which looks like a cleverly planned move carried out to thwart opposition to the scheme
191 Campaign to Protect Rural England – Berkshire Branch (CPRE)	<ul style="list-style-type: none"> <li>Express appreciation of documentation provided, in particular clarity and accessibility of supporting information and evidence.</li> <li>Expressed thanks to members of the Spatial Policy Team for helpful and friendly responses during the course of the consultation.</li> <li>Pleased to note that many of CPRE's previous comments and suggestions made at the February and September 2018 comments have been taken into account.</li> <li>Specific comments/concerns raised in relation to gaps, and Jealott's Hill (summarised in relevant sections of summary of responses).</li> </ul>
259 & 295 Thorin	Changes to the draft plan following consultation should be made available to residents.
579 Ridgway	Little point in commenting as comments are ignored.
	<b>Location of development</b>



031 De La Plain	There should be no more housing in Warfield/Bracknell
031 De La Plain	Development is obliterating villages.
031 De La Plain	There is no more Green Belt left.
	<b>Transport matters</b>
351 Society for the Protection of Ascot and Environs	Junction between Swinley Road and London Road is in need of development (right turn from Swinley Road onto London Road, and turning right into Swinley Road from London Road)
	<b>Other</b>
211 Carter	There is a limited number of low cost housing.
944 Clark	The Council should prioritise making more Conservation Areas within Binfield Parish (such as Murrell Hill Lane, and land by All Saints Church). There is a concentration of heritage assets in Binfield, and care should be taken to preserve their settings.
842 C Wallen	Section 2 is missing
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
749 Home Builders Federation	<p>Concerned that BFC Viability Study was prepared prior to new NPPF and guidance and therefore needs updating. HBF have following recommendations on how build costs, fees, profit etc. should be considered:</p> <ul style="list-style-type: none"> <li>• <i>Build costs.</i> Need to be updated in the current viability evidence to take account of inflation.</li> <li>• <i>Fees.</i> Cautious approach required e.g. professional fees on larger and more complex sites can be up to 20% of build costs.</li> <li>• <i>Developer profit.</i> The Council proposes 18% on GDV for market housing and 6% on affordable. PPG advises that profit should be 15% to 20% on total GDV for a development and the Councils approach will see profits at around 15%. Too low given the inherent risks of developing in the current market and the Council should increase the profit on the market proportion of any scheme to a minimum of 20%.</li> <li>• <i>Abnormals.</i> The assessment suggests that any abnormal costs are likely to be reflected in current BCIS figures. However, the BCIS costs reflect the cost of building a unit – do not include abnormal infrastructure costs over and above the standard costs. If these are significantly higher than expected then the reduction in land value may not be sufficient to incentivise the sale of that land. The Council should engage with housebuilders in Bracknell Forest to consider the amount of abnormal costs, they have faced in bringing sites forward. Evidence submitted by the HBF to the County Durham Local Plan for 14 sites showed that the average level of abnormal costs for a Greenfield site was £495,000 per hectare and £711,000 per hectare for brownfield sites</li> <li>• <i>Other policy costs.</i> Need to update assessment to reflect the policy costs being introduced in the local plan including the open space standards in LP14. Also concerned about impact of future arrangements for biodiversity net gain. Research by the Government and Savills  <a href="https://www.gov.uk/government/consultations/biodiversity-net-gain-updating-planning-requirements">https://www.gov.uk/government/consultations/biodiversity-net-gain-updating-planning-requirements</a>;  <a href="https://www.savills.co.uk/research_articles/229130/292298-0">https://www.savills.co.uk/research_articles/229130/292298-0</a></li> </ul>
<b>PROMOTERS OF SITE</b>	
967 Jordon Construction	BFC's Viability Assessment (2017) shows that in a number of scenarios, 35% affordable housing will make development unviable or push it to the margins of viability in lower value areas. In particular, typologies 4 and 5 are affected in this way, with only higher value development being considered viable across all land values. The Viability Assessment indicates that such development is only taken beyond marginal viability at values of over £4,200 per sq m. On the basis of average values across the Borough, as set out in Table 3.4.1 of the Viability Assessment, this would affect development across the Borough and in particular the larger strategic sites. The Viability Assessment suggests in paragraph 6.5 that in these situations increases in values will address such concerns but given that BFC is seeking to improve affordability it should not be seeking to rely on increased values in order to ensure the delivery of more affordable housing.
977 Wellington College	Inappropriate for Wellington College to fall in countryside as it fails to recognise the site is a major previously developed site and the College's role as a major institution and employer in the local area. Is a unique and valuable asset to local area – should have appropriate policy environment accordingly, like Sandhurst RMA (SA10). Characteristics and attributes acknowledged in SALP for RMA apply equally to Wellington College. College provides other benefits, including employment for approximately 800 people; annual spend of £30m supports businesses in area; during holidays college utilised for range of activities/ events; works with charities/ community groups; is an integral part of Settlement.
977 Wellington College	Inappropriate for Eagle House Estate to fall in countryside as it fails to recognise the site is a previously developed site and the role it plays in the local area.

977 Wellington College	<p>Important Wellington College estate is included within settlement boundary, or additional text and two policies and appropriate amended to policies map are added to BFLP. Suggests the following is added to the BFLP:</p> <p><i>“The Wellington College Estate is an important and historical educational institution which includes Eagle House and Wellington College. The College provides important national and local educational facilities. The Estate makes a significant contribution to the local economy and is a major local employer. It is important that it can continue to function effectively within its existing site.</i></p> <p><i>The site contains a range of buildings, including some listed buildings and a large area of undeveloped and beyond the existing built envelope. The objective of the proposed policy is to ensure that the Estate can continue to carry out development required for operational purposes to enable it to maintain its status as a world class institution whilst protecting the listed buildings on the site together with their setting and avoiding any adverse impacts on the character of the countryside and nature conservation.</i></p> <p><b>Policy X – Wellington College</b></p> <p><i>The area of land shown on the Policies Map, the Wellington College Estate, is suitable for built development to meet the College’s educational and operational needs provided that:</i></p> <ul style="list-style-type: none"> <li>• <i>The site’s heritage assets are sustained and, where possible, enhanced and the settings of the listed buildings are safeguarded from harm and, where possible, enhanced;</i></li> <li>• <i>Any development does not have any adverse impacts on the integrity of the Thames Basin Heaths Special Protection Area to the character of the countryside; and</i></li> <li>• <i>The height of any new development would not significantly exceed that of existing buildings on the site.</i></li> </ul> <p><i>Development proposals will be expected to accord with national policies and other policies within the Development Plan.</i></p> <p><b>Policy X – Eagle House</b></p> <p><i>The area of land shown on the Policies Map, the Eagle House Estate, is suitable for built development to meet the College’s educational and operational needs provided that:</i></p> <ul style="list-style-type: none"> <li>• <i>The site’s heritage assets are sustained and, where possible, enhanced;</i></li> <li>• <i>Any development does not have any adverse impacts on the integrity of the Thames Basin Heaths Special Protection Area to the character of the countryside; and</i></li> <li>• <i>The height of any new development would not significantly exceed that of existing buildings on the site.</i></li> </ul> <p><i>Development proposals will be expected to accord with national policies and other policies within the Development Plan.”</i></p> <p>Amended Policies map provided in response.</p> <p>Wellington College policy focused on key educational/operational element (38% of estate). Majority of site would remain countryside or fall within designated conservation areas (SSSI, LNRs or LWS).</p> <p>Eagle House focused on key educational/operational element. Majority of site remain in countryside.</p> <p>Consider policies promote effective use of land, whilst safeguarding and improving environment.</p>
<b>PROMOTERS OF OTHER SITES</b>	
565 Turley on behalf of Berkeley Strategic Land Ltd	<p>Notes that the Council has not produced a Duty to Co-operate Statement for consultation and recommends one is prepared and raise concerns that Plan could fail legal requirement.</p> <p>There is likely to be a requirement for the Western Berkshire HMA (which includes Bracknell Forest) to meet the needs of the Eastern Berkshire HMA. The Wider Growth Study Part 1: Defining the Area of Search (PBA, 2019) concludes that Bracknell Forest has the potential to meet the needs of some people from Slough and Royal Borough of Windsor and Maidenhead. Emerging Part 2 of the study also needs to be taken into account. Without any demonstrable evidence it possible that the Duty to Co-operate requirements have not been met.</p>

## Chapter 1 Introduction

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
510 Binfield Parish Council	Para 1.9. Advise that the Binfield Neighbourhood Plan will be revised and updated upon completion of the Local Plan.
527 Warfield Parish Council	Note that the Plan 'embraces' the proposals in the emerging Warfield NDP.  In their response to the March 2018 draft Plan, expressed caution about proposed housing trajectory and delivery factors for new homes – concerns remain, based on the experience of the Warfield SALP area.  Expect any changes made to the draft Plan as a result of the consultation to be published and open to further scrutiny.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
005 Brown	Pleased to see a reduction in the housing for the area, which reflects more accurately the required housing to meet the needs of the people.
484 S Collings, 602 M Collings	Para 1.6. Notes reduction in the Local Housing Need figure. Welcomes new sites which have enabled a greater proportion of the Borough's requirement to be provided from within existing built up areas, particularly sites within and on the fringes of Bracknell Town Centre. These are the most sustainable of the available sites in terms of their access to facilities and services including public transport.
288 Thorin	Para 1.7 (relating to Jealott's Hill) should not be included.
295 Thorin	Any changes made to the draft plan should be made available to residents.
416 Murphy	Paragraph 1.9: could be interpreted as the LPA makes strategic allocations to meet LHN, and that NPs can only allocate only in addition to that. Is that what is meant?
416 Murphy	Paragraph 1.11: be specific what 'limited additional provision' means
416 Murphy	Paragraph 1.13: confused about the level of detail for housing allocations in Part 1 of the Local Plan compared to NPPF paragraphs 17, 21, 28. Needs clarifying.
480 Home Farm	Plan period - analysis of progress by local authorities on Strategic Plans suggests that adoption is unlikely to occur until December 2021/January 2022. The plan period should be extended until at least March 2037 to comply with provisions of the NPPF. This would have resulting impacts on housing requirement and delivery of other uses.
826 Thames Valley Chamber of Commerce and Industry	Plan period – support extension to 2036.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
566 Nexus Planning on behalf of Kingacre Estates	Concerned that the standard methodology minimum housing figure is too low to support planned economic growth and fails to take into account of housing need arising from strategic infrastructure delivery.  (Comments also made in relation to Jealott's Hill – summarised under LP7)
673 Syngenta	Figure 1/Stage 9 has incorrect date in relation to Submission of Plan to Secretary of State. Refers to June/July 2010, should be June/July 2020.  Para. 1.7. Rather than refer to present situation within the Green Belt, text should be revised to refer to exclusion of part of the site from the Green Belt.  (Comments also made in relation to Jealott's Hill – summarised under LP7)
706 Gladman	<ul style="list-style-type: none"> <li>Supports extension of plan period to 2036.</li> <li>No mention of the removal of several previously proposed sustainable housing sites, which could make a meaningful contribution towards meeting local housing needs during the plan period in locations outside of the Green Belt.</li> </ul>
899 Shanly	Context that the Local Plan is being prepared in should be clearer. Suggested amendment:  The Bracknell Forest Local Plan forms part of the Development Plan for Bracknell Forest District Council. The plan should be considered alongside the remaining Development Plan documents, which at the time of adoption, include the following: Strategic Allocations Local Plan (2013) Replacement Minerals Local Plan for Berkshire (2001) Waste Local Plan for Berkshire (1998) Made Neighbourhood Plans Saved Policy NRM6 of the South East Plan which deals with the Thames Basin Heaths Special Protection Area

## Chapter 3 Vision and Objectives

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
270 Crowthorne Parish Council	Objective H: consider that this objective is not met in terms of the proposed Beaufort Park allocation. Comments summarised under Beaufort Park.
452 Historic England	The final two sentences of the Vision principally relate to development and its impacts, rather than the conservation and enhancement of the historic environment. The NPPF requires a positive strategy for the conservation and enjoyment of the historic environment, and this includes considering viable uses for heritage assets, the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring, as well as the role of the historic environment in conserving, enhancing and shaping local character and distinctiveness.  Currently inconsistent with national policy as it doesn't reflect the positive value of the historic environment.
452 Historic England	Incorrect to express the protection and enhancement of the historic environment as dependent on meeting development needs. The correct approach is the inverse, as set out in NPPF para 11.
511 Binfield Parish Council	Vision itself is supported. However, concern that there is limited evidence through the policies presented that the vision will be achieved, particularly in relation to promoting healthy and safe lifestyles, and communities having a strong sense of identity.  Comments on Objectives: <ul style="list-style-type: none"> <li>• B – protection of the countryside should be an asset in its own right.</li> <li>• G – what is meant by 'high quality', and who determines if this bar is met. This is not clarified in the document.</li> <li>• H&amp;I – neither objective adequately cover sustainable transport e.g. EV charging points, connected cycleways, footpaths and bus lanes.</li> <li>• There is no objective which promotes carbon neutrality. This should also be included in the Plan. Sections 149-154 of the NPPF are not reflected in the Plan.</li> </ul>
526 Warfield Parish Council	Generally supportive of the vision and objectives (notwithstanding concerns relating to Jealott's Hill proposal).  Vision: Green Belt is not mentioned in para. 2 of the Vision. Para. 6 wish to see addition of 'net loss of' ahead of biodiversity.  Objectives: <ul style="list-style-type: none"> <li>• C – query validity of statements 'secure the future...'</li> <li>• H – Expect BFC to work with neighbouring authorities to develop a sustainable transport system.</li> </ul>
946 Environment Agency	Not that potential shortfall in water supply (through infrastructure stress of climate change) is not addressed. Section 3.2 on Plan Objectives, under objective B, still states 'commensurate with meeting our development needs'. This appears to undervalue the natural environment in favour of development and so should be removed.  In addition, objective I refers to green infrastructure, but it is not made clear here that green infrastructure includes watercourses (also known as blue infrastructure). This issue arises in multiple places throughout the Local Plan. Whilst green infrastructure is defined in paragraph 9.8 of your Local Plan as including blue infrastructure, this definition should be made clear throughout the plan to ensure the blue infrastructure is also protected and enhanced. This might be achieved by either using the phrase 'green infrastructure (including blue infrastructure)' or similar or referring to the definition of green infrastructure in paragraph 9.8 in either the supporting text or footnotes.
894 Winkfield Parish Council	Vision should reference borough having made good progress in transitioning towards target of eradicating net contribution to climate change by 2050 to support Council motion passed July 2019. Should be reference to a reduction in the use of private cars and increase in use of more sustainable transport, through improved cycle routes and integrated public transport systems.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
701 Berkshire Gardens Trust	Welcomes the inclusion of the protection of the historic environment and its setting within the Vision and under Objective B. However, we would like to see the inclusion of reference here to historic landscapes, not only registered parks and gardens but also those of local value.
782 Woodland Trust	Objective B – add "woodland" to the list of assets and "ancient woodland" to the list of protected habitats, so as to read: <i>Commensurate with meeting our development needs to ensure that the Borough's valued natural and historic environment is properly protected, enhanced, supplemented and managed as appropriate to its significance; such as, countryside (including the Green Belt), landscapes, woodland, open spaces, community facilities, heritage assets (including their setting), water, air and soil environments, and areas of nature conservation/ecological value (including Habitats Sites and ancient woodland).</i>
782 Woodland Trust	Objective G – add "built and natural" to environment, so as to read: <i>To ensure that new development is designed to a high standard that meets the Borough's needs and makes a positive contribution to maintaining and enhancing local character, distinctiveness and the attractive built and natural environment, whilst safeguarding the amenity of existing and future residents.</i>
006 Brown	Could include that some measures have co-benefits e.g. tree planting has benefits for climate change mitigation, adaption, biodiversity and flood alleviation.
006 Brown	Section D needs to be refer to 'net zero carbon', rather than 'zero carbon'.
006 Brown	Section D should also refer to risks from extreme heat and drought as well as flood risk in relation to climate change.
038 Holland	3.1. In relation to increased access to services and facilities, a bus route should be provided through the spine road of Blue Mountain, and other bus stops close to the village of Binfield.
038 Holland	In relation to "residential will have benefited from increased access to services and facilities to promote healthy and safe lifestyles" (page 43) there have been no benefits, despite promises, e.g. no health/community centre in Binfield.
038 Holland	B: in relation to heritage assets, various ancient hedgerows surrounding assets have been uprooted and replaced with ne planning.
038 Holland	F: new health centres required.
040 Holland	In relation to 'valued countryside will be protected', need reassurance that the Borough is serious about this.
040 Holland	Village of Binfield is small – consideration needs to be given to suitable roads.

202 Singleton	3.1. In relation to “increased access to services and facilities to promote healthy and safe lifestyles” and “new sustainable village community based on garden village principles”. Garden village neighbourhoods successfully developed in other countries. CIL from 4000 homes at Jealott’s Hill could fund regular bus services and cycle network to surrounding towns. Background of bike use vs. car use in Dutch cities provided. Opportunity for Bracknell to be next Groningen (Dutch university city where 59% of trips made by bicycle). Innovation and use of CIL could address concerns about how site could be made sustainable.
202 Singleton	3.1. In relation to “impacts of development on designated areas such as Habitats Sites and Green Belt”. NPPF para. 135 permits boundary changes in exceptional circumstances. Coalescence in Green Belt land east of Priory Road/ north of London Road major change in circumstances (thin strip of land failed to prevent coalescence). Exceptional circumstances could be used to protect against coalescence. Suggest adding land to the Green Belt to mitigate proposed loss of Green Belt at Jealott’s Hill: <ul style="list-style-type: none"> <li>• WINK 19. Land between London Road and Longhill Road. This triangle of land is north of WINK 20.</li> <li>• WINK 20. London Road former landfill site. This site has been removed from the latest draft Plan for housing allocation.</li> <li>• WINK 21. The Brackens, London Road. Brompton Gardens has already been developed. Green Belt could protect against future infilling, which happens a lot.</li> <li>• WINK 22. Land to south of London Road, east of Bog Lane and west of Swinley Road (Whitmoor Bog). This site has been removed from the latest draft Plan for housing allocation.</li> </ul>
202 Singleton	Objective D: In relation to “minimising pollution... towards zero carbon” consider BFC should retain green spaces because of multiple benefits, including wildlife, sequester carbon, landscape. If more trips were made by bicycle in borough pollution would drastically reduce and help towards a zero carbon footprint.
202 Singleton	Objective F: Gaps retain identity of settlements. Winkfield Neighbourhood Plan group wish to prevent coalescence. Local gaps removed from draft Neighbourhood Plan but consider that designating some new Metropolitan Green Belt (WINK 19, WINK 20, WINK 21 and WINK 22) would fulfil wishes to prevent coalescence – some areas have been removed from being proposed allocations in latest draft Plan.
202 Singleton	Objective H: Proposed Jealott’s Hill development could generate sufficient CIL funding to improve bus services and fund a cycle network connecting Bracknell, Ascot, Maidenhead and Windsor. Following combined routes could address need for a safe cycle route which does not exist today. Suggests: <ul style="list-style-type: none"> <li>• Cycle route from Garden Village to Bracknell Town Centre. Syngenta publicity material proposes a walkway and cycleway from the Garden Village to Bracknell Town Centre.</li> <li>• Cycle Route through Syngenta-proposed Garden Village.</li> <li>• Proposed Route through Winkfield Parish and Warfield Parish to Jealott’s Hill. This route is from Jealott’s Hill across Drift Road into the forest and could connect to St Leonard’s Hill via the public right of way.</li> <li>• Public Right of Way by St Leonard’s Hill. Windsor Safari Park was replaced by Legoland who erected a fence thereby blocking a Public Right of Way from the top of St Leonard’s Hill. It emerges at various points including the forest by Drift Road in Winkfield Parish. The Windsor and District Ramblers campaigned against the loss of the footpath. They won their campaign. The fence was moved and that footpath is still open today. Legoland extension plans have been approved by RBWM, so the future of this footpath is unclear. This is an opportunity.</li> <li>• National Cycle Route 4. The National Cycle Route passes through St Leonards Road B3022.</li> </ul>
277 & 289 Thorin, 903 R Wallen, 842 C Wallen	3.1. In relation to the vision: <ul style="list-style-type: none"> <li>• Paragraph 2 - does not mention Green Belt alongside brownfield and greenfield land.</li> <li>• Paragraph 3 – existing sites in Bracknell Town Centre and around Bracknell could be used to support economic growth – further sites will unnecessarily impact environment. No certainty that agri tech business will stay in Jealott’s Hill and will remain a local business.</li> <li>• Paragraph 6 – should refer to ‘net reduction in biodiversity’ since biodiversity on its own is just a thing.</li> </ul>
903 R Wallen	Vision para 6 - should include drought due to impact on availability of potable water.
277 Thorin	Objective C: questionable that the Council will have powers to ‘secure the future’ of Syngenta business which is owned by ChemChina. Unrealistic that BFC can achieve this objective - should be removed.
903 R Wallen, 842 C Wallen	Objective C – Syngenta should be named. Agri tech should be in full with agri tech in brackets to cover further references.  Objective should be removed. The Borough Council should not be assisting the growth of businesses, especially large corporations who can afford to invest and develop areas of businesses as appropriate.
277 Thorin	Objective H: objective not strong enough. Roads in northern parishes not wide enough with too much traffic. Needs to be joined with cycle network.
277 Thorin	Objective I: objective unclear. “right time” questioned. Consider infrastructure should be in place prior to any development.
337 BBOWT	3.1. Consider word ‘international’ should be added to paragraph 6 “...valued <b>international</b> , national and local natural assets...” to take account of internationally recognised SPA and SAC designations.
485 S Collings, 603 M Collings	Para 3.1. Agree development needs to be sustainable.
417 Murphy	Local Plan Vision paragraph 1: include the overlapping (not consequent or subordinate) environmental challenge of biodiversity decline.
417 Murphy	Local Plan Vision paragraph 2: brownfield should be specified as first choice and greenfield needing justification
417 Murphy	Local Plan Vision paragraph 4: disagree with term garden village.
417 Murphy	Local Plan Vision paragraph 5: no indication of how a sense of identity would be retained in rural Warfield. Woodhurst is still being built out, and if Jealott’s Hill is developed to the north, it will become an urban parish to the northern boundary with RBWM. Allocations in villages of Warfield Street and Hayley Green, while not objected to in principle, add to the sense that Warfield has become a ‘dumping ground’ for development, and a building site for the next 30 years. Careful rethinking needed.
417 Murphy	Local Plan Vision paragraph 6: Green Belt is a “valued ... natural asset”. Not reflected in the new strategy. Green Belt is the best known and most popular planning policy and has been exceptionally successful at preventing urban sprawl. Green Belt policy was strengthened in NPPF 2018 despite government policy to boost housing supply significantly. The only reasonable inference is that boosting the housing supply does not translate into developing in the Green Belt. It is disappointing to see the Council drop its previously robust defence of the Green Belt. It is inaccurate to say here that impact on the Green Belt will be mitigated – it will likely prove undeliverable (unless LP 7 is dropped).
417 Murphy	Objective B: laudable but not achievable due to overdevelopment of Warfield.
417 Murphy	Objective C: Syngenta is not a “local business”, as its multi-national. Its “future” and “position” are surely down to strategy together with market forces and competence, respectively, both beyond the power of the Council to “secure”, and not something an LPA should use a public benefit (Green Belt) to try and influence.
735 Richardson	Objective D. Level for development / land supply should aim to allocate suitable land to meet all development needs including affordable housing and housing for older members of the population.
826 Thames Valley Chamber of Commerce and Industry	Support the vision particularly the 3 <sup>rd</sup> paragraph.

826 Thames Valley Chamber of Commerce and Industry	Encourage the Council to work with key partners to 'support economic growth and resilience' (objective C).
826 Thames Valley Chamber of Commerce and Industry	Should have a stronger focus on supporting sustained levels of economic growth, through commitment to secure higher levels of inward investment into the Borough. Working alongside the Chamber, also welcomes focus on delivering a programme of effective account management that maintains engagement with the business community.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
503 Hawksbury Homes	3.1: Vision Suggest that the Local Plan Vision on p 13 should be amended to read: "The housing needed to support the growing population (including <b>specialist accommodation to meet the needs of older people</b> )" 3.2: Objectives Suggest text for Objective D is amended to read: "To allocate suitable, available and well located land to meet all identified development needs (including affordable housing <b>and older persons accommodation</b> )"
566 Nexus Planning on behalf of Kingacre Estates	Development should be allocated in the most sustainable locations starting with previously developed land in urban area, followed by previously developed sites outside of settlement boundaries in otherwise sustainable location. All before greenfield sites or land in the Green Belt is considered for development (consider that Jealott's is contrary to these objectives).
622 BRP	Request amendment to 'The Borough will remain a destination of choice for retail, leisure and employment' to make it clearer that the town centre should remain the destination of choice in accordance with the town centre first requirement set out in the NPPF.
622 BRP	Strongly support town centre objective (clause 'E').
674 Syngenta	Support the vision, however, amendment to Vision to make specific reference to Syngenta and expand to provide background to the site and its economic/employment contribution.  Support Objectives, though request change to Objective C as follows:  "To ensure that suitable sites, buildings, and high-quality infrastructure are provided to support strong economic growth and a varied local economy. These should provide flexibility and be able to adapt to changing economic needs. To secure the future of a significant local business, Syngenta, and ensure that it maintains its position as a global leader in the agri tech business.  Syngenta's Jealott's Hill Research Station has been there for 90 years and is a significant employer within the Borough, supporting the employment of some 850 employees. Jealott's Hill is the only major global R&D centre for new agrochemical research in the UK. As one of three sites of strategic global importance to Syngenta, it has the scale, depth and breadth of expertise and reputation in the core scientific skills required to address the global challenges facing the agricultural sector."
707 Gladman	<ul style="list-style-type: none"> <li>• There should be mention of the importance that the Government attaches to Green Belt.</li> <li>• Support objectives, in particular objective A, B (however Green Belt should be listed separately here to reflect that its significance differs from other areas of countryside), C and F.</li> </ul>
725 Landsec	The Vision should include the strategic objectives of the Bracknell Town Centre Vision 2032 document.  Objectives do not refer to introduction of residential development within the Town Centre – contrary to point f of paragraph 85 of the NPPF.
565 Turley on behalf of Berkeley Strategic Land Ltd	Broadly supports vision and objectives however concerned unable to achieve objectives as the allocation of further land is needed for flexibility.

## Chapter 4 Spatial Strategy



NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
318 Bracknell Town Council	Local Plan Strategy is supported. Paragraphs 4.11/4.12 - Bracknell Town Centre proposals should enable good access to green space, have good quality urban design and create a good environment for residents. Should also be attractive for office uses.
513 Binfield Parish Council	Para 4.13. Further sustainable use of Bracknell town centre by Binfield residents will only be achieved if public transport options are enhanced to reduce congestion.  Para. 4.15. Local centre shops should be encouraged in larger new developments, with thought given to cumulative impacts. Blue Mountain and Temple Park do not have shops, which leads to car journeys.  Para. 4.17. One of the reasons for reduced office space requirements is the increase in home working. This will only remain an attractive option with good telecommunications connectivity. Therefore full fibre connections must be a requirement for all new developments, and be facilitated in the existing housing stock.  Para. 4.18. Employment land in Amen Corner South needs protecting. Existing uses (car services and body shop repairs) are important services for the population.  Para 4.25. Supports the protection of the Green Belt (further comments provided in relation to Policy LP7).
528 Warfield Parish Council	Notes the strategy, and that Green Belt in Bracknell Forest continues to make a contribution to one or more of the five Green Belt purposes.  Para. 4.21. Pleased to note that BFC recognises the impact that development has on existing communities. WPC endorses this view and will challenge BFC to ensure this is properly managed in the future.  Para. 4.24. Misleading for the Council to say that no areas were identified for removal, when it goes on to do so in para 4.25.  Para. 4.25. Notes that the NPPF refers to altering the Green Belt in exceptional circumstances, and these must be fully evidenced and justified. WPC recognise the work that has been undertaken on the site of national and global importance, and the development of the integrated science park is welcomed. However, not seen evidence that enabling development is required in the form of the proposed garden village. (Also see more detailed comments in relation to Policy LP7).
947 Environment Agency	In paragraph 4.5, 'Constraints', we request that other important habitat sites are included, such as SSSI's, Local Wildlife Sites, Local Nature Reserves, rivers and ancient woodland. This is because these sites are also of great importance to biodiversity. We suggest the following changes to the wording:  <i>The Borough contains a number of physical and environmental constraints which influence the location of development. These include areas liable to flood, such as the river corridors of The Cut and its tributaries, Natura 2000 Sites (the Thames Basin Heaths Special Protection Area (SPA) and Windsor Forest and Great Park Special Area of Conservation (SAC)), Sites of Special Scientific Interest, Local Wildlife Sites, Local Nature Reserves, ancient woodland and the Metropolitan Green Belt.</i>  The Key Constraints map should also include rivers and these extra habitat sites, especially the SSSI's.
880 Royal Borough Windsor and Maidenhead	Supportive of proposals to increase capacity and density of sites in/around Bracknell Town Centre. However concerned that the release of land at Jealott's Hill is an inappropriate spatial strategy response to meeting development needs. Concerns remain over promotion of development sites to the north and east of Bracknell in the Green Belt which would reduce the gap between towns of Ascot and Bracknell.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
007 Brown	In light of Jealotts Hill proposal, there should be extra protections for remaining Green Belt.
042 Holland	Optimistic to state there is no need for additional office space – Bracknell needs to attract new businesses with employees who will possibly take up the new housing.
203 Singleton	Whilst supportive of proposed Jealott's Hill site, considers that there should be no net loss of Green Belt overall in the Borough. Believes such a strategy would result in expensive delays like RBWM. Consider compensatory improvements such as woodland planting, biodiversity improvements, enhancements to walking/ cycle routes. Provides statistics about numbers of homes built on Green Belt nationally. Refers to application 18/00777/OUT Ascot Heath School playing fields being refused and would like examples of precedence for 'exceptional circumstances' to justify release of Green Belt to accommodate a housing estate.
203 Singleton	Figure 3 Key Diagram: map does not clarify precise boundary of strategic gap Bracknell – North Ascot. Question whether the gap is the same extent as the Entec Study 'local gap 4'. Consider gap is needed and states that history has shown the Planning Inspector who examined Core Strategy was wrong to conclude that the Green Belt in this area would prevent coalescence.
904 R Wallen, 843 C Wallen	Figure 3 - should this be labelled 'Garden settlement', rather than 'Garden village' for consistency of terms throughout document
279 Thorin	Very special circumstances for changing Green Belt are not detailed in the Local Plan evidence base, cites NPPF para. 143. Considers potential harm to Green Belt outweighed by other considerations (NPPF para. 144). Urban sprawl in Green Belt has many negative consequences, including traffic, air pollution and loss of agricultural capacity. No details provided on required alternative (extract of NPPF para. 137 provided).
604 M Collings, 486 S Collings	Figure 2 – disappointing that Warfield is not identified on this map in view of level of housing proposed.
604 M Collings, 486 S Collings	Welcomes reference to SALP sites continuing to deliver during plan period and that <i>cumulatively they are having a significant impact on existing communities</i> . Land N of Warfield is having a significant impact even though a relatively small proportion of the allocation of 2200 new homes has been delivered plus one of the two new primary schools and no community facilities.
604 M Collings, 486 S Collings	In view of results of Green Belt Review, should only be looking for sites outside the Green Belt for all housing needs. Syngenta is wholly owned by ChemChina (a multi-billion dollar company) – must be able to adapt and expand without enabling development. No evidence submitted.
418 Murphy	Strategy box: good place making approach. Consideration of greenfield setting can foster integrated community when settlements enlarged.
418 Murphy	Paragraph 4.21: needs to be taken into account for next plan period as Warfield villages and hamlets are between 2,200 homes to the south and 4,000 to the north.
418 Murphy	Key diagram: some elements are not dealt with in this chapter: Strategic gap, Green wedge. Helpful to show where they are dealt with.

734 Richardson	Para 4.22: Research on sites outside settlement boundaries should be ongoing. Para 4.25: More evidence required into circumstances for release of Green Belt sites for development. Query over sustainability of Jealotts Hill as a development area considering its relatively remote location and lack of infrastructure base, amenities and facilities .
904 R Wallen, 843 C Wallen	Para 4.25 contradicts para 4.24. Makes a mockery of BFC protecting the Green Belt. Approx 6% of the Borough's Green Belt would be removed with the Jealotts Hill proposal which is very substantial. Particularly concerning when the local housing need has been satisfied using sites outside the Green Belt.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
354 Schyde	Consider that approach set out in paragraph 4.10 extends to Moss End Garden Village/ Garden Centre, which is an out-of-centre facility. Comment in relation to amendment to Policy LP10 added under that policy.
354 Schyde	In relation to paragraph 4.15 strategy stating "...local centre is also proposed at Jealott's Hill providing retail and community facilities..." consider that Local Plan should ensure no duplication of the existing Moss End facility.
504 Hawksbury Homes	<ul style="list-style-type: none"> <li>Object to Section 4 as it lacks clarity on types of use that are deemed acceptable within each settlement. Should be more clarity on where specialist housing, including C2, on unallocated sites would be accepted. The Spatial Strategy does not fully define the role of smaller settlements and villages.</li> <li>Paragraph 4.4 does not include evidence demonstrating the level of specialist accommodation required within the Borough, including the SHMA (2016).</li> <li>No specific policy included that outlines and defines the Spatial Strategy for the Plan. It therefore fails to provide certainty and is not effective in line with NPPF para 35 c.</li> <li>All settlements defined by Policy LP2 should be explicitly referred to in the spatial strategy and Key Diagram to provide clarity over the role of these settlements within the overall hierarchy.</li> </ul>
566 Nexus Planning on behalf of Kingacre Estates	<p>Support the allocation of brownfield land within the urban area as first priority, and welcomes the acknowledgement that additional land outside settlement boundaries will be needed to help need development needs.</p> <p>When considering land outside settlement boundaries, considers that previously developed land should take priority (reference made to site at Forest Farm, which is considered to fall within this category).</p> <p>Do not consider that land at Jealott's Hill falls within this category, and is an unsound approach.</p> <p>(For comments made in relation to omission site at Forest Farm, and Jealott's Hill, see separate sections).</p>
677 Syngenta	<p>Support the spatial strategy and recognition the need for investment at Syngenta and the Vision for the plan can only be achieved if Jealott's Hill is released from the Green Belt.</p> <p>Reference is made to the assessment of the contribution of the site to the Green Belt i.e. 'it has already been assessed'?</p> <p>(Comments also made on the need for Jealott's Hill/exceptional circumstances – summarised under LP7).</p>
565 Turley on behalf of Berkeley Strategic Land Ltd	Concerned that the spatial strategy seeks to direct development to Bracknell centre in the first instance and may fail to meet the needs of a range of households.
565 Turley on behalf of Berkeley Strategic Land Ltd	Spatial strategy: supports Bracknell being identified as the most sustainable settlement but notes that there is no reference to allocation of Jealott's Hill which is counter to the spatial strategy. Only 39% of sites are in Bracknell which is not sufficient to deliver the strategy.
726 Landsec	<p>Paragraph 4.11 – 4.13 makes no reference to the short, medium- and longer-term objectives of the Bracknell Town Centre Vision 2032 document which is key to the council's economic growth and regeneration aspirations</p> <p>The Peel Centre/the Point has been identified as an opportunity area within the vision document - not reflected within the Local Plan.</p>
890 Persimmon/Souter	<p>Sites that are being proposed for allocation fail to reflect approach set out in para 4.7</p> <p>Note reference to 'available' in 4.22. Sites BRA4 and SAND5 do not follow this advice. Issue with alternative open space on SAND5. Also object to Hayley Green Neighbourhood Plan site, earmarked for 235 dwellings – indefensible approach.</p> <p>Para 4.23 - new settlement at Jealott's Hill fails to follow approach set out – contrary to NPPF, scant justification given for the so-called <b>enabling development</b>, its financial basis, and the means of securing research-related development.</p>

## **Chapter 5 Sustainability Principles**

### **5.1 Sustainable development principles (LP1)**

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
105 South East Water	Need for mandatory housing standards for water use which would support water efficiency on new buildings should be included.
453 Historic England	Need to recognise as part of a positive strategy for the historic environment that heritage also has cultural (i.e. social) and economic aspects.
515 Binfield Parish Council	Para. 5.5. This should strengthen the requirement to make all new developments carbon neutral.
517 Binfield Parish Council	Agrees with LP1 (iv) in relation to protect and enhance the natural environment, and significance of heritage assets.
529 Warfield Parish Council	Supportive of the principles set out in the chapter and Policies LP1 & LP2, particularly the provision of infrastructure and services within settlements.
948 Environment Agency	We note that LP1 has not been updated to include river corridors as within green infrastructure networks. As noted above, it is not clear that green infrastructure includes watercourses (also known as blue infrastructure) until paragraph 9.8 of your Local Plan. We suggest that either this definition is included earlier or in supporting text for LP1, or a footnote is used to refer to the definition of green infrastructure in paragraph 9.8, or the following wording is included in LP1 to capture the importance of blue infrastructure:  <i>vi) protect and include essential infrastructure, services and facilities required, and enhance the green infrastructure network (including watercourses);</i>  We also again request that supporting text to LP1 is included that links policy LP1 to policy LP12 as this refers to development protecting or enhancing existing infrastructure or providing new infrastructure. The provision of infrastructure for waste water is especially important to prevent pollution.
948 Environment Agency	<u>Paragraph 5.5</u> We requested in our response to your draft Local Plan dated 26 March 2018 that the provision of wastewater infrastructure was included in paragraph 5.5 (previously 4.5) as an environmental principle to ensure there is no deterioration of water quality. This change has not been made. We recommend the following wording is included in this section: 'By preventing pollution through the provision of adequate wastewater infrastructure'. The wording at the start of the final bullet point in this section 'by minimising the risk of damage' is quite negative, is not aspirational and gives the perception that the bare minimum is sufficient. It should instead be phrased more positively such as 'by protecting'. In addition, the phrase 'increase biodiversity' could be changed to 'enhance biodiversity'. Also remove the last 'where possible' as this reduces the strength of the statement. We suggest the following wording: <i>By protecting areas of importance for nature conservation and taking opportunities to extend the green infrastructure network and the network of open spaces to enhance biodiversity.</i>
948 Environment Agency	<u>Key evidence</u> Under the heading 'Key evidence' following paragraph 5.5, the only evidence listed is the NPPF (paras 7-9). Other documents should also be used to inform these principles, such as your Strategic Flood Risk Assessment, Water Cycle Study and Infrastructure Delivery Plan.
894 Winkfield Parish Council	Should have a specific reference to permitted development being required to support the Council's target zero net Carbon contribution by 2050
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
786 Woodlands Trust	The policy fails to mention biodiversity net gain as a strategic sustainable development objective, although it is referenced in section 5.5. Recommend changing the wording of either iv) or v) as follows: <i>iv) protect and enhance the natural environment, delivering biodiversity net gain, and the significance of heritage assets including their settings;</i> <i>v) minimise the use of natural resources, deliver biodiversity net gain, address the waste and respond to climate change</i>
008 Brown	5.5 – flooding should not be singled out as a key example of climate change. Other impacts should also be considered such as extreme heat and drought.
702 Berkshire Gardens Trust	Include reference to historic landscapes, not only the Borough's registered parks and gardens but also those of local value. Request that the following amendments are made under LP1 para 5.5 bullet 2: <i>By protecting and enhancing the significance of buildings, sites and features of archaeological and historic interest, and historic landscapes, together with their setting.</i>
204 Singleton	Will be difficult for development to fulfil all the criteria in Policy LP1. Fully support proposals which will achieve bullets vi, vii, viii & ix even if they don't fully achieve i-v.
247 & 248 Gillham	Council should actively pursue development which can deliver both employment and housing needs in a way which ensures appropriate local infrastructure is delivered.  Address climate change – should be carbon neutral. Should mandate that all new construction should be carbon neutral, and schemes adopt district heating schemes to maximise efficiency of energy and heat utilisation across business and residential components of a scheme.
487 S Collings, 605 M Collings	Support LP1
419 Murphy	Paragraph 5.3, bullet 2, 1 <sup>st</sup> and 2 <sup>nd</sup> sentence: add that needs to be consistent with national policy
735 Richardson	Policy LP1: (i) Should be redrafted so it reads providing land and buildings with the aim of meeting all development needs of the area as well as towards adjacent areas where necessary.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
357 Michael Williams Planning on behalf of Schyde Investments	Promoters of Bowyer's Lane, Moss End In relation to para 5.11, there is impetus for selecting land at Bowyer's Lane for development, which provides both retail and local job opportunities and therefore helps minimise travel requirements.
505 Hawksbury Homes	Policy LP1 should be amended to read: "Proposals for development will be permitted that: Provide suitable land/buildings to help meet <b>the specific identified development needs of current and future residents</b>
566 Nexus Planning on behalf of Kingacre Estates	No objections to the principles set out in 5.1. However, as the Council accepts that development needs cannot be met within the urban area, consider there should be acknowledgement of this within the policy to provide a policy basis which allows development of this type to come forward.
658 S2 Bracknell Ltd	Supportive of the development principles identified in Policy LP1, and are supportive of criteria which seek to encourage sustainable travel, and minimise reliance on private car.  However, concerns relating to current wording, as unlikely that development will be able to address all of the sustainability criteria identified, and place unnecessary burden on new proposals.  Request amended wording as follows:  "Proposals for development will be permitted that, <b>have regard to:</b> "
678 Syngenta	Support the sustainability development principles. Consider that the site at Jealott's Hill would represent sustainable development (reasons summarised under LP7).
678 Syngenta	Clarification of what waste is being referred to in draft Policy LP1 (point v).

708 Gladman	<p>Policy as drafted is inconsistent with the NPPF's approach to applying the presumption in favour of sustainable development, because:</p> <ul style="list-style-type: none"> <li>• "Proposals for development will be permitted that..." implies that permission should only be granted for development proposals that fulfil each of the points that are covered in the enumerated list that follows, when harm from a development has the potential to be outweighed by wider sustainability benefits, e.g. the tilted balance in the event the LPA is unable to demonstrate a 5 year HLS.</li> <li>• the NPPF does not set a principle that the natural environment and heritage assets together with their settings will be protected and enhanced, rather it requires only the consideration of the significance of such assets.</li> <li>• Policy should reflect the significant weight the NPPF places on the need to support economic growth.</li> </ul>
717 Escrillion	Support
727 Landsec	Should encourage development to be directed to previously developed land within the urban area in the first instance in line with NPPF.
891 Persimmon/Souter	Para 5.11 – implies that approach to selecting urban expansion options around Bracknell Town should be favourable. Object to omission of SHLAA Sites WAR4 and WAR5 on the south flank of Cabbage Hill. <i>Only a small part</i> of the controlled land was advanced for development - 4.9ha for housing and 13ha for open space.

## 5.2 Sustainable Locational Principles (LP2)

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
515 Binfield Parish Council	Agree with the Policy.
948 Environment Agency	This policy sets out sustainable location principles, however environmental constraints are not listed. For example, the risk of flooding and impact of development on the environment such as on biodiversity and water quality should be always considered. We suggest the following changes are made to LP2:  <i>Development will be permitted in defined settlements, including within the developable area of allocated sites. Development will be permitted which is consistent with the character, accessibility, <b>environmental constraints</b> and provision of infrastructure and services within that settlement.</i>
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
	No Comments received
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
727 Landsec	Policy could be amended to include a hierarchy of sustainable development locations.
658 S2 Bracknell Ltd	Supportive of the locational principles identified. However, concerns relating to prescriptive nature of policy in terms of character, and suggest amended wording as follows:  "Development will be permitted in defined settlements, including within the developable area of allocated sites. Development will be permitted which is consistent with the character, accessibility and provision of infrastructure and services within that settlement <u>without preventing or discouraging demonstrably appropriate innovation or change (such as increased densities).</u> "
705 Gladman	The approach taken by the collective policies of the Local Plan towards development within the countryside is arbitrary. Policy should be revised to provide a criteria-based approach that enables proportionate and sustainable development to come forward, to provide flexibility should allocated sites not come forward as expected. Policy HOU5 of the adopted Ashford Local Plan is referred to as a good example.
736 Richardson	Policy LP2: Development should be allowable outside settlements where circumstances such as land supply warrant it and where such development can be accommodated in a way that positively relates to the character and function of nearby settlement(s) and which causes minimal impact on the rural environment.
632 Pegasus on behalf of Redrow Homes and Persimmon Homes Thames Valley	Wording of policy refers to "...within the developable area of allocated sites.....". Consider 'developable area' is unnecessary and should be deleted. Accept that not every part of an allocated site will be suitable for development, however this seems to be a reference to the indicative developable areas shown on the maps in Appendix 4.  The developable area is only indicative, and should be left to the application stage to demonstrate how much of the site is developable, and it is not appropriate for a draft local plan to attempt to define developable areas without having all necessary technical information.  (Comments made with reference to Peacock Farm site, BIN20).
565 Turley on behalf of Berkeley Strategic Land Ltd	Does not allow for flexibility should further sites be required, or to respond to changing market conditions. Therefore, not positively prepared as required by the NPPF.

## **Chapter 6 Housing**

### **6.1 Provision of Housing (LP3)**

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
369 Wokingham Borough Council	The previous Draft Plan included BFC and West Berkshire would accommodate unmet need from Reading in full. Since that time, WBC understanding is that the modest shortfall in Reading's local plan has effectively been removed when more recent assessment of housing need are considered.
373 Wokingham Borough Council	Identified land supply within the Plan is only marginally greater than the identified need (10,777 compared to 10,455). Therefore concerned that the identified supply does not have appropriate flexibility to cope un the event sites are not delivered as envisaged.  Adequacy of land supply is reliant on a large allocation in the Warfield Neighbourhood Plan, of which there are uncertainties of delivery.  Whilst the proposed allocation at Jealott's would provide flexibility, WBC suggest that BFC consider identifying further supply to ensure the growth strategy contains sufficient flexibility to deal with changes in future housing requirements or unknown issues in deliverability.
474 Slough Borough Council	Supportive of using the new standard methodology for calculating local housing need and proposing to meet this in full.
530 Warfield Parish Council	Accept that housing is needed at a national and local level, however cautious about housing demand/supply and need based on experience of Warfield SALP site.
594 - West Berkshire Council	Reference to 'at least' figure will ensure that there will be flexibility in provision to enable the Borough to meet its housing need. Note that a large proportion of the Borough's housing requirement is planned to be provided from within existing built up areas and in and around Bracknell town centre.
881 Royal Borough of Windsor and Maidenhead	Notes drop in housing need from 670 to 615 per annum. The proposal for Jealott's Hill appears at odds with other policies and evidence set out in Draft BFLP since it represents a significant over-provision of housing and employment within the borough relative to agreed needs and targets.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
009 Brown	Para. 6.23 – as updates to the Planning Practice Guide are expected, there should be mention here to green and grey sustainable urban drainage systems.
420 Murphy	Paragraph 6.18: allocations are more sustainably distributed than in the previous version, except for LP 7.
	<b>Impact of new housing</b>
029 Henderson	Local area being ruined
029 Henderson	Infrastructure can't cope with new housing (doctors, roads)
737 Richardson	Policy LP3: Noted that Plan provision of 10,445 homes during plan period is a minimum and footnote should be added that this is a reduced amount compared to previous estimate and overall provision may well rise above this. It should be made clear that 10,445 must not be treated as a ceiling figure. Need for specific policy placing responsibility on BFBC to maintain a 5 year supply of deliverable suitable housing sites at all times with added presumption in favour of development where such a supply does not exist.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
HBF	Local housing needs assessment only represents the minimum number of homes that should be delivered. The Government require Councils to give consideration as to whether more homes are needed to take account of: <ul style="list-style-type: none"> <li>• Unmet housing needs within neighbouring areas</li> <li>• Growth strategies and infrastructure improvements</li> <li>• Need for affordable housing</li> </ul> Each of these issues and their relevance to Bracknell Forest  Unmet need of 230 dwellings in Reading that is expected to be delivered in the West Berkshire HMA. However, this has not been acknowledged by the Council in this latest consultation document and it will be important for the Council to either increase its housing requirement accordingly or show where the unmet needs of Reading will be delivered.  Inspectors examining the new London Plan have submitted their final report to the Mayor of London. Whilst the report considers the approach to assessing housing needs to be sound, the Panel did not consider there to be sufficient evidence to show that the plan would deliver the level of homes suggested by the Mayor. The inspectors state that a more realistic level of delivery across London would see a shortfall against housing needs of some 140,000 (14,000 dpa) over the next ten years. This is a substantial shortfall and it will be incumbent on authorities in the wider South East to work with London Borough's increase supply accordingly.  Paragraph 2a-010 of PPG refers to situations where a Council may need to deliver more homes than the minimum established through the local housing needs assessment. - Council needs to consider whether the economic aspirations of the Borough, and Berkshire in general justify an increase.  Paragraph 2a-024 states that an increase in the total housing figure may be required where it could help deliver the required number of affordable homes. The Council state it would have to deliver 227 affordable homes (paragraph 2.4.2 Housing Topic Paper) each year to meet needs. On the basis of the expected levels of affordable housing to be delivered each site the Council will seemingly fall short of this requirement. It is therefore essential that the Council establish the number of affordable homes this plan will deliver and if necessary, increase the overall housing requirement in order to meet the need for



299 Bracknell Land Limited and Tingdene Parks Limited	<ul style="list-style-type: none"> <li>No allowance has been made for the non-implementation of extant schemes with planning permission e.g. Reading Local Plan (Nov 2019), has a non-implementation rate of between 0% and 20% (depending on the status of the site). Suggest 10%.</li> <li>The 10% flexibility allowance is too low. Adjustments to SALP sites (allocated but without planning permission), suggest this should be 15%.</li> <li>The windfall allowance is excessive - not based on evidence. Unlikely that the level of medium windfalls will continue at previously permitted rates due to allocation of some of these sites</li> <li>Contradiction in definition of a 'medium' site in policy LP4 and glossary</li> <li>Reliance has been placed on the allocation within the Warfield Neighbourhood plan, yet there is no certainty that this site can be delivered. Plan has not yet been found to meet basic conditions and correspondence with Examiner reveals problems e.g. breaches EU regulations. Also a number of local objections to site.</li> <li>No allowance has been made to meet a proportion (if not all) of Reading's unmet need. of 230 dwellings.</li> </ul> <p>In conclusion, total that needs allocating is 3,818 made up of current sites allocated in draft local plan (excluding Warfield Neighbourhood Plan site) 1,793 and shortfall requiring further allocation of 2,025.</p> <p>Also, the Government states that the standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. LHN is below SHMA figure and figure should be raised.</p>
395 Crown Estate	<p>Para 60 of the NPPF states that the standard methodology should be used to determine the 'minimum' number of homes needed. Para 11 of the NPPF requires that plans are 'sufficiently flexible to adapt to rapid change'.</p>
395 Crown Estate	<p>The BFLP housing requirement is not sufficiently flexible to allow for changing circumstances which may result in potential non-delivery or slower delivery of committed sites, previous under-delivery (refer to HDT result) or aspirations relating to the regeneration of Bracknell Town Centre.</p>
395 Crown Estate	<p>Doesn't take account of any unmet housing need of neighbouring authorities – likely that Wokingham B will have unmet need.</p>
395 Crown Estate	<p>Notes high reliance on existing commitments and questions deliverability especially of SALP sites that have not yet come forward. High proportion of draft allocations are located within the urban area and are likely to be complex to deliver - unusual costs, dependent on infrastructure provision, dependent on relocation of existing uses or occupiers. Some draft allocations also involve multiple ownership or are subject to significant constraints.</p>
395 Crown Estate	<p>Around 55% of all allocated units are located in Bracknell Town Centre and are likely to provide smaller units and flatted accommodation. According to the SHMA, the greatest need is for larger units (3 and 4 bed).</p>
481 Home Farm Land Ltd	<p>Policy LP3 There is a significant increase in the number of dwellings that need to be identified through the plan process:</p> <ul style="list-style-type: none"> <li>The housing provision figure in Policy LP3 is based on the minimum requirement derived from the standard methodology. The figure should be increased to give some weight to the South East Plan housing figure, supported by housing requirement figure in the SHMA, as a previous assessment of need; and the housing need increases further if the plan period is extended as suggested.</li> <li>There is no flexibility in the housing number to address any additional need as assessed through the SHMA.</li> <li>Medium sized sites are included within the Borough's housing supply. Evidence from the SHELAA on completions on medium sites implies that the medium sites commitments would take nearly 16 years to complete.</li> <li>The Article 4 Direction removes prior approval rights in Bracknell Town's eastern, southern and western business areas which has the potential to significantly reduce medium windfalls within the Borough. Medium windfalls should therefore be removed from the housing requirement calculation.</li> <li>The allocation of 34,000 sq.m. of employment floorspace in Bracknell has implications for workforce and the requirement for housing in the Borough.</li> </ul> <p>The Plan fails the test of soundness (positively prepared, justified, effective and consistent with national policy).</p> <p>Plan period - analysis of progress by local authorities on Strategic Plans suggests that adoption is unlikely to occur until December 2021/January 2022. The plan period should extend until at least March 2037 to comply with provisions of the NPPF. This would have resulting impacts on housing requirement and delivery of other uses.</p>
506 Hawskbury Homes	<p>Agree with the Council's calculation of local housing need using the standard method has been calculated correctly.</p> <p>Source and deliverability of sites in Table 1 on p.33 have not been fully justified.</p> <p>Medium sized sites should be allocated within the Plan rather than included as a windfall allowance.</p> <p>Allocated sites (in the Site Allocations Local Plan) should be reassessed to ensure deliverability and accordance with spatial strategy, particularly if expected timescales for deliverability have slipped since they were originally allocated in 2013.</p> <p>Identified permissions, allowances and allocations should form part of identified supply rather than reducing need and 10% flexibility allowance applied to overall need figure.</p>
565 Turley on behalf of Berkeley Strategic Land Ltd	<p>Not disagreeing with the baseline LHN figure however consider further land is needed to meet requirements under the Duty to Co-operate and unmet needs in the Eastern HMA. Risk plan will be found unsound.</p> <p>(Comments made with reference to Parkview Farm site, BRA1).</p>
565 Turley on behalf of Berkeley Strategic Land Ltd	<p>Policy LP3: add 'at least' to the policy to allow for flexibility.</p>

<p>566 Nexus Planning on behalf of Kingacre Estates</p>	<p>Policy refers to provision of at least 10,455 additional homes. However, given that MHCLG data on dwelling stock (Table 123) indicates on average that Bracknell has c. 31 demolitions per annum, the wording of policy LP3 should be amended to refer to delivery is at least a 'net' additional 10,445 homes. Failure to do so risks under delivery against the standard method.</p> <p>The PPG is also clear (ID 2a-010) that there are circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates. Concerns raised in terms of soundness and the approach taken within the Plan of only meeting the standard methodology minimum.</p> <p>These relate to the following:</p> <ul style="list-style-type: none"> <li>• Economic growth and strategic infrastructure: The Employment Needs Study (LP/Ev/3e) confirms that the standard methodology minimum will support workplace base job growth of 570 jobs pa. On the basis that the Plan constrains planned economic growth to the standard methodology minimum, question to extent to which in preparing the Plan, significant weight has been placed on a) the need to support economic growth and productivity, and b) taking account of the needs of local business and wider opportunities for development. Also whether regard has been had to the priorities set out in the Thames Valley Strategic Economic Plan, or the planned Heathrow expansion (which the Airports Commission business set out will significantly boost both jobs and housing demand around Heathrow, including Bracknell Forest). Considered that the standard methodology minimum housing figure is too low to support planned economic growth over the plan period, and fails to take account of housing need arising from Heathrow expansion.</li> <li>• Previous assessment of housing need: The Berkshire SHMA (2016) concludes that the Objectively assessed needs is 635dpa. This has been endorsed by Bracknell Forest, therefore evidence is required to justify departure from the SHMA evidence.</li> <li>• Significantly boosting housing supply: The Plan asserts that a figure of 615dpa accords with Governments objective of significantly boosting housing supply, on the basis that the previous adopted Local Plan (Core Strategy 200148) required was 557dpa. Do not consider that an increase of 58dpa (10% increase) represents a significant boost to housing supply.</li> </ul>
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<p>575 Woolf Bond Planning on behalf of Warfield Park Homes, 592 Woolf Bond Planning on behalf of JPP Land Ltd, 700 Woolf Bond Planning on behalf of JPP Land Ltd</p>	<p><u>Housing requirement</u> Acknowledge that the housing requirement in Policy LP3 reflects the output of the minimum Local Housing Need assessed under the Government's standard methodology. However, the Planning Practice Guidance (PPG ID 2a-010-201902) provides advice on when it might be appropriate to plan for a higher figure than the Standard Method indicates.</p> <p>The Berkshire SHMA figure suggests an overall requirement of at least 10,795 dwellings (635 dpa) rather than 10,455 dwellings (615 dpa) as currently envisaged. A higher figure as advocated by the PPG would have implications for the contended supply. As currently drafted, LP3 reflects the minimum requirement, with no flexibility to address any additional need as assessed through the SHMA. This fails the soundness test in terms of being justified and consistency with national policy.</p> <p><u>Plan period</u> NPPF (para. 22) sets out strategic policies should look ahead over a minimum 15 year period. Based on the current Local Development Scheme with submission in 2020, and taking account of average length of time from submission to receipt on an Inspector's report (c. 17 months), adoption could not be expected until end of 2021/ early 2022 at the earliest. Therefore to comply with national policy, plan period to be extended to at least March 2037. Current plan period fails the soundness test in terms of being justified and consistency with national policy.</p> <p><u>Housing supply</u> In relation to expected supply set out in Table 1 of the Plan, do not consider that medium windfall allowance should be included as insufficient evidence in the SHELAA (analysis of the SHELAA has identified medium sites which are subsequently earmarked for allocation). The supply of medium windfalls is also restricted through the Council's Article 4 Direction removing permitted developed rights for prior approvals for conversion of office to residential in the eastern, southern and western industrial areas. The envisaged supply from this source (772 dwellings) should be omitted.</p> <p>Also consider that supply from the proposed allocations on Jealott's Hill (LP7) and Derby Field (LP6) should be omitted from the supply (1,417 dwellings), as the allocations are unsound) (see comments made on these sites – summarised separately).</p> <p>Acknowledge the value of a flexibility allowance, but consider this should be applied to the revised Plan requirement covering the extended plan period (2019-37), resulting in the following requirement overall:</p> <ul style="list-style-type: none"> <li>• Revised Plan target from April 2019 to March 2037 is (635 from SHMA x 18) = 11,430</li> <li>• Less commitments in sources A-C and F of table above at April 2019 (7,493)</li> <li>• Sub-Total = 3,937</li> <li>• Plus flexibility allowance (10% of sub-total) = 394</li> <li>• Revised sub-total of additional dwellings to be found in Local Plan = 3,543</li> <li>• Deduct small windfalls potentially delivered 2019-37 (18 years at 21 dpa) (378)</li> <li>• Final total of number of additional dwellings to be found = 3,165</li> </ul> <p>To ensure the Plan is sound, sites for a further 1,859 (3,165-1,811) dwellings should be identified.</p>
<p>632 Pegasus on behalf of Redrow Homes and Persimmon Homes Thames Valley</p>	<p>Object to the housing requirement as consider that the level of housing need has been underestimated, and additional sites required to meet the need (consider that the capacity of Park and Ride site has been under-estimated – see comments on 6.2 relating to BIN20).</p> <p>Separate report on housing requirement provided, which sets out the following:</p> <ul style="list-style-type: none"> <li>• Concerned that the Council is departing from the objectively assessed need as determined in the 2016 SHMA, which provides a approach to assessing housing need in the area. Standard housing need figure of 615 dwellings per annum is the minimum amount of housing. This should be viewed as a starting point for reaching an objectively assessed level of need. The SHMA has been ignored which determined a need for 635 dpa.</li> <li>• If the SHMA (and approach) were updated, in terms of economic growth since the SHMA (and what effect this has on affordability), plus effects of a buoyant London economy, this produces an estimated update of 252 homes over the current standard method baseline of 469 homes per year, making a total overall need estimate of 721 homes per year.</li> <li>• Therefore, use of 615 dpa is unjustified.</li> <li>• Need pressure is likely to be generated by neighbouring areas, such as Surrey Heath, Hart, Wokingham, and Windsor and Maidenhead (which have been largely dismissed by the Council within the 2019 Housing Background Paper). Early evidence indicates that other authority areas are struggling to meet their own need.</li> </ul>
<p>634 St William</p>	<p>Land at Bog Lane, Winkfield – SALP Site Consider the site to have the capacity to accommodate in excess of the estimated 40 homes and that delivery can commence within the first 5 years of the Draft Local Plan period.</p>
<p>653 Thakeham Homes</p>	<p>Welcome cross-border collaborative working on West of Berkshire Spatial Framework and response to housing need in the Berkshire SHMA. However concerned have not undertaken a collaborative approach in considering housing allocations situated along administrative boundaries, especially in relation to Binfield.</p>

653 Thakeham Homes	Housing figures for BFC should be increased to meet a proportionate amount of Reading Borough Council's unmet housing need (943 dwellings) through Duty to Cooperate. Should be a necessary increase of at least 10,455 over the period. Local Plan would be positively prepared if it accommodated a proportion of Reading's unmet need. Estimated capacity of sites of 3,651 dwellings can be increased to agree with minimum numbers for district overall.
660 Lightwood Strategic	In relation to meeting the requirement:  Agree with the revised assumptions on allocated sites resulting in a loss of 607 units from the supply.  Setting aside Jealott's Hill, some built-in flexibility is included on residual requirement. However, this equates to only 1.6% against the overall housing requirement. Whilst the Council accepts the need for flexibility, the approach taken is not meaningful.  Medium windfall allowance equates to 900 dwellings. Having regard to the SHELAA and land being promoted by Lightwood Strategic, there are sites available to allocate to meet the windfall allowance figure. Therefore, this source of supply should be converted into hard allocations.
660 Lightwood Strategic	In relation to housing need:  Support plan period being extended to 2036.  If adoption slips to 2022, requiring the plan period to be extended to 2037 (to allow a 15 year plan period) this would require a further 615 dwellings as part of the housing requirement.  Assessment relates to minimum figures derived from the standard methodology. No assessment in the evidence base of the degree to which employment growth forecasts have been taken account of.
675 Syngenta	In order to retain the level of affordability (house price over earnings) at current levels modelled forecast demonstrate that it would be necessary to provide for approximately 700 dwellings per annum (as opposed to the housing requirement of 615 established by BFC)  There would be a deficit in the delivery of affordable homes based upon a figure of 227 affordable homes/annum (3,859 net affordable homes) i.e. 35% of a housing requirement of 10,455 would yield a total of 3,659 affordable units resulting in a deficit of 200 homes in the plan period. The delivery of housing at Jealott's Hill would support the case for exceptional circumstances to increase housing supply and affordability of housing. The new housing would support existing and emerging Govt initiatives such as shared ownership and right to buy.  Development would provide a mix of housing sizes and tenure (including affordable) for those working at Syngenta and those within the Science and Innovation Park at very life stages for 'graduates/professionals/families'.
681 Quod on behalf of Legal and General Homes Communities (Crowthorne) Ltd (L&G)	Supportive of the revised housing targets which have been amended to reflect the Governments standard methodology for calculating housing need.
709 Gladman	Generally supportive of the strategic approach the Council is proposing to meet the identified housing and economic need over the period to 2036. Concerned that the 10% flexibility allowance is inadequate to respond to changing circumstances. Re comments to LP2, the rigid use of settlement boundary policies to disregard otherwise sustainably located development proposals that are well related to existing settlements does not provide such flexibility and therefore does not represent a positive or proactive approach.
718 Escrillion	Support the retention of the 'Land at Warfield' in the calculations of existing commitments. Unrealistic allowance for reduction in capacity of existing SALP planning commitments  Concerned about overestimation in past delivery rates e.g.806 dwellings projected between 2018/2019 but only 755 dwellings were delivered. Latest housing trajectory (published July 2019), sets out projected rates of delivery for the next five years, which are significantly higher than past rates of delivery. More robust evidence is required to justify these figures. HDT result supports concerns.  Concerned about failure to consider any shortfall accrued during the Core Strategy plan period. Between 2006/2007 and 2018/2019, the Council has delivered 2,569 fewer residential units than they were anticipating, and 2,374 residential units fewer than required.
728 Landsec	Highly sustainable locations should be prioritised for development.  6.13 – wording implies that all sites that can deliver have been identified, which will not always be the case. Approach might hamper larger sites coming forward.  6.21 – a more flexible approach to housing delivery should be considered due to historic under delivery.
755 S2 Bracknell Ltd	Supports emerging policy, but consider policy should be positively worded to reinforce the efforts to increase housing supply, in the context of historic under delivery in the borough.  Policies should promote residential densities appropriate to accessibility, in order to ensure consistency with the NPPF.
892 Persimmon/Souter	Support figure in LP3, but its translation into 5 year supply is confused and not in any way transparent. Para 5.22 states that the last HDT showed that the Borough achieved 75% of its (3-year) requirement. Therefore, why is the stated buffer 20%? Justified explanation of the '6 year land supply' required.
900 Shanly	Table 1 – make it clear that allocated sites referred to are those in the SALP.

**6.2 Sites allocated for residential/mixed use development (LP4)**  
**General/comments on introductory text**

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
313 Wokingham Without Parish Council	Need to consider impact of all the proposed sites on the air quality in TBH SPA.
317 Bracknell Town Council	Allocations are supported
369 Wokingham Borough Council	Supportive of promotion of higher density housing in the Town Centre.
454 Historic England	Specific comments also made in relation to Hayley Green, Derby Field, Beaufort Park and Jealott's Hill (see separate summaries). In previous response to the Plan (letter of 23/03/2018) recommended that detailed assessment of impact of sites upon historic environment took place. Welcome work that forms part of the evidence base: <ul style="list-style-type: none"> <li>• CLP/Ev/7a – Archaeological Appraisal of sites</li> <li>• LP/EV/7ba – Historic Environment Assessment of sites</li> <li>• LP/EV/7c – Historic Environment Assessment of Additional Sites</li> <li>• LP/Ev/7d - Historic Environment Assessment of Additional Sites (Addendum 2)</li> </ul>
454 Historic England	Consider that all allocations should have policy requirements (like LP5), rather than separate site profiles - there needs to be a stronger link between parent policy LP4 and the profiles.
517 Binfield Parish Council	Requests that affordable housing numbers designated for sites are reflected in s.106 agreements. Developers should not be allowed to reduce numbers on grounds that a site is not "economically viable".
580 South Oxfordshire District Council	Welcome the recognition of the importance of neighbourhood planning and the inclusion of a breakdown of the allocations by neighbourhood area. This will provide certainty to communities and enable them to manage growth effectively
894 Winkfield Parish Council	Many statements in proposed policies require more evidence and explanation to be presented to enable informed view to be made.
894 Winkfield Parish Council	Affordability of houses is an issue – house prices exceed income levels of most households. Need provision in future developments to provide lower cost really affordable homes. 'Affordable' means 20% less than market value, which is not enough in this area.
894 Winkfield Parish Council	Would be good if all approved planning applications included an agreed delivery plan preventing developers sitting on sites for unacceptable periods of time.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
138 Samson	Object to site ( <b>NB</b> site not specified in rep): <ul style="list-style-type: none"> <li>• Only the developers will benefit long-term</li> <li>• Loss of green space, which has a value to local residents</li> <li>• Congestion.</li> </ul>
180 Crowthorne Village Action Group (CVAG)	Need to take account of the cumulative impact of developments, as Crowthorne is split between Bracknell Forest and Wokingham Borough (for example 186 homes at Ravenswood Nine Mile Ride, and 2,000 homes in Wokingham in the southern arc between Wokingham and Crowthorne).
182 Crowthorne Village Action Group (CVAG)	Page 41 Table 3 (relating to totals by designated neighbourhood). This needs to be updated to reflect SAND 5 (Derby Field) designated as part of settlement of Crowthorne. so should be updated as follows:  Crowthorne: 217 (instead of 0) Sandhurst: 23 (instead of 240)
223 Chavey Down Association	Development will result in increased pressure on: <ul style="list-style-type: none"> <li>• Transport routes</li> <li>• Mains/waste water</li> <li>• Surface water flooding (flooding along Forest Road at the bottom of Locks Ride/Braziers Lane)</li> <li>• Introduction of strategic SANG sites to provide capacity for smaller development could encourage inappropriate development.</li> </ul>
223 Chavey Down Association	Development in Winkfield should take account of the following: <ul style="list-style-type: none"> <li>• halting of the erosion of the 'gap' separating Bracknell from Ascot</li> <li>• highways infrastructure (can't cope with current level of use)</li> <li>• secondary school provision (current provision non-existent, many children in the area are not able to attend the school of their choice, and none are within walking distance)</li> <li>• existing health services under strain</li> <li>• supply of water is low</li> <li>• local drainage and sewage systems can't cope</li> <li>• impact of further development on the Special Protection Area</li> </ul>
223 Chavey Down Association	Minor developments are proposed to be excluded from the sequential test – often where there is the greatest adverse impacts.  All development identified in the SFRA should be subject to FRA.
421 Murphy	Paragraph 6.23: supports more use of brownfield sites to reduce greenfield allocations to meet LHN.
421 Murphy	Paragraphs 6.28 – 6.29: hope it will lead to a good choice and supply of well-located homes that are affordable for young people, key workers and others on modest salaries, whose contribution to the borough is as valuable as the high-paid.
703 Berkshire Gardens Trust	Pleased to see that no Registered Parks and Gardens will be affected by the allocations in this document and that the parkland landscapes around the allocations at Land North of Tilehurst Lane and at Popes Manor, Binfield are both recognised for their non-designated value to be protected and enhanced.

738 Richardson	Policy LP 4 Sites allocated for development: Queries if allocation of 235 homes due in part to emerging Warfield Neighbourhood Plan is well founded given the character and function of Hayley Green where other potential housing sites are available that would better assimilate into the fabric of this and other nearby settlements.
783 Woodland Trust	<p>Object to ancient woodland areas being included in proposed sites.</p> <p>Pressure for housing makes it more important that vital protections for ancient woodland and veteran trees are upheld. Refer to NPPF paragraph 175c</p> <p>Direct impacts that would lead to damage or loss of ancient woodland habitat or veteran trees must either be avoided or compensated for if the need is judged to be truly exceptional; there is no appropriate mitigation for the loss of irreplaceable habitats.</p> <p>Where development sites are adjacent to ancient woodland, it is recommended that as a precautionary principle, a minimum 50 metre buffer should be maintained between a development and the ancient woodland, including through the construction phase, unless the applicant can demonstrate very clearly how a smaller buffer would suffice. A larger buffer may be required for particularly significant engineering operations, or for after-uses that generate significant disturbance.</p>
845 C Wallen	Para 6.24 "Some of the previously proposed greenfield sites, including two strategic countryside sites." Sentence doesn't make sense.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
355 Michael Williams Planning on behalf of Schyde Investments	Paragraph 6.11: supports housing figure
355 Michael Williams Planning on behalf of Schyde Investments	5 year housing land supply statement is confusing. HDT test showed borough as achieving 75% of its 3 year requirement so why is the buffer 20%? Until explained the 6 year land supply is not demonstrated.
481 Home Farm Land Ltd	<p>Policy LP4 There is a need to identify additional sites within the plan.</p> <ul style="list-style-type: none"> <li>- Home Farm is currently at Public Inquiry which demonstrates its availability and deliverability.</li> <li>- Home Farm is adjacent to the new settlement boundary created by strategic development at Warfield. Allocations BIN1, BIN5, BIN10, SAND5, WAR9 and WINK15 are located adjacent to the current settlement boundary and minor revisions are proposed to the boundary to incorporate these sites.</li> <li>- The Landscape Appraisal identified Home Farm as being of medium landscape sensitivity, as is SAND5 and BIN1; and BRA4 is of medium-high landscape sensitivity.</li> </ul>
506 Hawkbury Homes	Specific sites should be allocated for C2 accommodation in order to ensure that the growing need for C2 accommodation is met by the Plan, and not rely on being delivered through windfall, which is an uncertain source of supply.
565 Turley on behalf of Berkeley Strategic Land Ltd	Notes the sites proposed for allocation and includes a commentary (summarised under the relevant site).
653 Thakeham Homes	Proposals map for Binfield does not include The White Cottage, Forest Road (Binfield) [N.B. site is in Wokingham BC], so uncertain if been properly accounted for given its fringe location on administrative boundary. Site also not taken account of in 'made' Binfield Neighbourhood Plan either. Issue should be examined properly in interests of soundness.
661 Lightwood Strategic	<p>The Plan includes specific allocation policies for LP5 and L6, however, other sites include site profiles within an appendix. Together with the caveat "Development Management should be contacted for up to date and comprehensive details of requirements". This is not a sound approach. The profiles should be included in the main body of the plan with their own LP reference.</p> <p>Jealotts Hill has its own policy, but is not listed in LP4.</p>
681 Quod on behalf of Legal and General Homes Communities (Crowthorne) Ltd (L&G)	Strongly support the retention of the former TRL sites through saved Policy SA5 of the SALP. However, not considered that the Draft Plan is clear enough on which SALP policies are to be retained. Recommend that the final Plan explicitly lists upfront for clarity which policies are saved.
710 Gladman	<ul style="list-style-type: none"> <li>• WINK14 should be allocated to provide further contingency and flexibility needed to ensure housing need is met over the plan period.</li> <li>• Query whether suggested dwelling capacities for designated neighbourhood plan areas, in order to satisfy the requirements of paragraph 65 of the NPPF, have been justified through the Council's evidence base.</li> </ul>
756 S2 Bracknell Ltd	<p>Object to the policy as it simply provides a list of sites to be allocated.</p> <p>Status of existing allocations (some of which remain undeveloped) contained in the adopted Development Plan is not currently framed in the emerging Plan.</p> <p>In the contest of historic under delivery, the Plan should identify minimum development capacity rather than 'suggested' capacity.</p> <p>Current wording is prescriptive, and exacerbated when read alongside other policies such as housing mix (LP23) and parking requirements (LP54).</p>
659 , 755 & 762 S2 Bracknell Ltd	<p>S2 Bracknell Ltd own Bracknell Beeches – supportive of the allocation of the site and the recognition that the site can be developed at a higher density, as well located in a sustainable location on the edge of Bracknell Town Centre.</p> <p>The site is on previously developed land, therefore, the capacity should be maximised.</p> <p>The existing requirement for increased parking in a sustainable location is at odds with the NPPF and has implications for site efficiency and viability.</p> <p>Whilst there is an easement over the footbridge, the link is outside of S2 Bracknell Ltd, and subject to National Rail control. If this link were removed, pedestrians would have a longer route to the town centre. To enhance accessibility, suggest there is a significant opportunity to extend the pedestrian /cycle link across the north of site BRA13 (Coopers Hill) to provide a quicker access to the Town Centre via Crowthorne Road North (reference made to the Tibbalds Master Plan study, 2015)</p>

**6.2 Sites allocated for residential/mixed use development (LP4)  
BIN1 Land North of Tilehurst Lane**



NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
454 Historic England	Site has been assessed as having high potential effect on the historic environment, and agree with this. Site has subsequently been allowed on appeal. Welcome requirements in site profile.
517/518 Binfield Parish Council	The site is contrary to LP1(iv) which aims to protect and enhance natural environment and significance of heritage assets, and Objective B of the Plan.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
<b>Infrastructure/highways</b>	
050 Moynihan, 075 Davis, 153 Myall, 179 Bozon, 308 Sones, 365 Glasson, 381 Bird, 536 Elliott, 568 Glover, 583 Smith, 873 Boorman, 933 Glen	Impact of increased traffic and congestion.  (Tilehurst Lane, Stevenson Drive, Terrace Road, and cumulative impact of existing/proposed developments)
075 Davis, 536 Elliott	Impact upon drainage.
129 Marshall, 280 Runham, 268 Westbury, 347 Whrapshire, 437 Ketley, 447 Leary, 536 Elliott, 750 Comper, 755 J Clarke, 963 Leary	Tilehurst Lane is too narrow to take additional traffic and pedestrians – multiple points of danger along road.
179 Bozon	Conflict with access/egress with children's nursery on corner of Terrace Road North/Tilehurst Lane.
179 Bozon	Access to the site should be restricted to the lower end of Tilehurst Lane, next to the Stag and Hounds pub.
179 Bozon	Impact of heavy vehicles (construction) on traffic, and damage to surrounding road surfaces.
268 Westbury	Where will construction vehicles park.
365 Glasson, 381 Bird, 583 Smith, 536 Elliott, 599 Leary	Pressure on local facilities.
599 Leary	Would not result in housing which is affordable for the community.
<b>Heritage/Character</b>	
034 Prew, 153 Myall, 381 Bird	Too much development is planned for Tilehurst Lane/Binfield - should be reduced.
050 Moynihan	Building on infill sites does not preserve the heritage of the village.
050 Moynihan, 075 Davis, 308 Sones, 583 Smith, 873 Boorman	Loss of open spaces – should be preserved not built on.
075 Davis	Impact through loss of open space to history and identity of Binfield.
150 Moynihan, 153 Myall, 280 Runham, 268 Westbury, 347 Whrapshire, 365 Glasson, 381 Bird, 437 Ketley, 447 Leary, 536 Elliott, 583 Smith, 619 S Peacey, 750 Comper, 775 J Clarke, 830 Phillips, 873 Boorman, 933 Glen, 619 Peacey, 963 Leary	Impact upon grade II listed Binfield Park/heritage assets including Stag and Hounds PH, and non-designated landscape parkland.  (loss outweighs benefits)
568 Glover, 775 J Clarke	Blurring of boundaries between Binfield Village and Bracknell town.
750 Comper, 963 Leary	If proceeds, it should be of an appropriate density and high quality design in keeping with heritage assets and parkland setting.
775 J Clarke	Detrimental impact on wider landscape.
619 Peacey	Contradicts Council's evidence base as follows: <ul style="list-style-type: none"> <li>LUC report on the historic environment states that there is likely to be substantial harm to heritage assets.</li> <li>Expert witness assessment states the harm that Bin 1 will cause to the significance of listed heritage assets (report attached).</li> <li>Historic consultee response to 9 houses in Tilehurst Lane cites the cumulative effect of development along Tilehurst Lane on heritage assets including Binfield Park grade 2* as a reason for refusal (report attached)</li> </ul>
<b>Other</b>	
050 Moynihan, 308 Sones, 365 Glasson, 568 Glover, 583 Smith	More sustainable sites for development than this site (and BIN5 & BIN10)
050 Moynihan, 075 Davis, 153 Myall, 365 Glasson, 583 Smith, 873 Boorman	Increased pollution/air quality.
129 Marshall, 308 Sones, 268 Westbury, 381 Bird, 437 Ketley, 447 Leary, 750 Comper, 933 Glen, 963 Leary	Impact on varied wildlife.
153 Myall	Objections made to appeal scheme should be taken into consideration.
280 Runham	The site has been approved on appeal, any detailed plans should be closely looked at before further approval.
308 Sones	Risk of subsidence.
308 Sones	Risk of flooding.
381 Bird	Increased noise.
437 Ketley, 447 Leary, 750 Comper, 963 Leary	Despite outline application being granted, there may be restrictive covenants which might assist in limiting the harm of the development/stop the development.
447 Leary, 536 Elliott, 775 J Clarke, 830 Phillips, 963 Leary	Should not be allocated, no justification, despite being allowed on appeal.
750 Comper, 619 Peacey, 963 Leary	Would only deliver a small amount of housing (loss outweighs benefits).

963 Leary	Questions why keep allocating sites linked to heritage assets.
963 Leary	Other sites won on appeal have not been included in the Local Plan.
963 Leary	Also submitted copy of petition received for application 17/01174/OUT alongside representation.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
<b>PROMOTERS OF SITE</b>	
593 Woolf Bond Planning on behalf of JPP Land Ltd	Support the allocation of BIN1, which should be retained as an allocation through future stages of the Local Plan. Suitability of the site has been confirmed in appeal decision for 40 dwellings in October 2019 (17/01174/OUT).
<b>PROMOTERS OF OTHER SITES</b>	
565 Turley on behalf of Berkeley Strategic Land Ltd	Should reflect allowed Appeal APP/R0335/W/19/3228697 (for 40 dwellings) and be included as a commitment.

**6.2 Sites allocated for residential/mixed use development (LP4)  
BIN5 Land South of Forest Road and East of Cheney Close**

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
454 Historic England (HE)	Site BIN5 has been assessed by LUC in the Historic Environment Assessment of SHELAA Sites reports as having either 'low' or 'no' potential effects. HE has reviewed their records and can see no reason to differ on these sites. However, this does not necessarily mean that these sites do not contain archaeological significance and further archaeological investigation, including site evaluations, may be required as part of any planning application.
517/518 Binfield Parish Council	Object to the site. Local opposition to site – proximity to Blue Mountain and important visual amenity along the roads.  If development does go ahead would wish to see: <ul style="list-style-type: none"> <li>Retention of current hedgerows and trees, in line with the recommendations of the Binfield Landscape Character Assessment (especially along Wood Lane).</li> <li>Consideration to traffic on Forest Road especially in peak periods.</li> </ul>
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
	<b>Infrastructure/highways</b>
050 Moynihan, 066 Searle, 075 Davis, 153 Myall, 266 Chalmers, 281 Baker, 268 Westbury, 308 Sones, 347 Wharphshire, 365 Glasson, 400 Mulroy, 437 Ketley, 445 Farthing, 483 Baloch, 536 Elliott, 568 Glover, 578 Marriott, 583 Smith, 598 Clark, 600 Apoux, 635 G Leary, 671 Wood, 800 Jacobs, 813 Gray, 830 Phillips, 873 Boorman, 933 Glen	Impact of increased traffic on congestion, air quality and highway safety  (including to Terrace Road North and South, Forest Road, and cumulative impact of existing/proposed developments).
075 Davis, 483 Baloch, 578 Marriott	Impact upon drainage.
150 Moynihan, 266 Chalmers, 347 Wharphshire, 365 Glasson, 400 Mulroy, 483 Baloch, 536 Elliott, 583 Smith, 599 Leary, 635 G Leary, 830 Phillips	Pressure on existing services/amenities, schools etc
034 Prew, 050 & 150 Moynihan, 075 Davis, 129 Marshall, 280 Runham, 568 Glover, 598 J Clark, 635 G Leary, 813 Gray	Field should be enhanced and kept as open space recreational area, not built on
599 Leary	Would not result in housing which is affordable for the community.
671 Wood	Existing traffic makes it difficult to cross Forest Road, which will be worsened.
	<b>Heritage/Character</b>
050 Moynihan	Building on infill sites destroys the heritage of the village.
075 Davis, 619 S Peacey, 647 J Clark	Impact through loss of open space to history and identity of Binfield
153 Myall, 281 Baker, 365 Glasson, 583 Smith, 437 Ketley, 447 Leary, 600 Apoux, 647 J Clark, 635 G Leary, 800 Jacobs, 873 Boorman	Impact on heritage assets.
153 Myall, 445 Farthing, 483 Baloch	Too much development is planned for Tilehurst Lane/Binfield, and should be reduced.
266 Chalmers	Building on the countryside.
266 Chalmers, 830 Phillips	Impact to the character of the area.
308 Sones, 437 Ketley, 447 Leary, 583 Smith, 483 Baloch, 647 Clark, 671 Wood, 800 Jacobs, 813 Gray, 830 Phillips, 873 Boorman, 930 Wallace, 933 Glen	Loss of open spaces – should be preserved not built on.
568 Glover	Blurring of boundaries between Binfield Village and Bracknell town.
483 Baloch, 536 Elliott	Loss of protected trees.
600 Apoux	Light pollution from new school, street lighting – impact to wildlife.
635 G Leary	Site helps separate Binfield from Bracknell
	<b>Other</b>
050 Moynihan, 308 Sones, 365 Glasson, 568 Glover, 583 Smith, 447 Leary, 600 Apoux, 800 Jacobs, 933 Glen	More sustainable sites for development than this site (and BIN1 & BIN10)
050 Moynihan, 075 Davis, 153 Myall, 281 Baker, 268 Westbury, 365 Glasson, 437 Ketley, 583 Smith, 600 Apoux, 800 Jacobs, 873 Boorman	Impact of increased pollution/air quality.
066 Searle	If new development required, infilling and redevelopment of existing properties would be preferable.
066 Searle	Sites west to M4 which have better road access would minimise disruption to the village.

280 Runham, 347 Whrapshire, 483 Baloch, 536 Elliott, 619 S Peacey, 873 Boorman, 930 Wallace	Field was promised as SANG/green space for Blue Mountain, not to be used for housing. Agreed by Examiner of the SALP. Breach of trust/unethical.
268 Westbury, 308 Sones, 483 Baloch, 578 Marriott, 600 Apoux, 813 Gray	Impact to wildlife
308 Sones	Risk of subsidence.
308 Sones, 813 Gray	Risk of flooding.
598 Clark	The site should be used for tree planting.
437 Ketley, 635 G Leary	Sites that are more sustainable have been removed from the plan
483 Baloch	Impact to privacy of existing residents.
483 Baloch	Brownfield land should be prioritised over greenfield sites.
600 Apoux	Noise pollution.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
<b>PROMOTERS OF SITE</b>	
886 Boyer on behalf of Bloor Homes Ltd	<p>Bloor have an option on both BIN5 and BIN6. Whilst the SALP indicated that these two sites would be SANG land, as Bracknell Football Club did not relocate to the site, the SANG was located elsewhere within the site. The Blue Mountain application significantly overprovides open space (c 4.5ha) within the red line area (excluding BIN5 and BIN6), therefore sufficient open space to serve Blue Mountain together with BIN4 and 5. Principle of development has already been established through previous Local Plan. As the full quantum of development (400 units) were shown within the red line area and masterplan relating to application 16/00020/OUT, the quantum of development for BIN5 &amp; BIN6 needs to be re-confirmed through the new Local Plan. Also consider that an additional piece of land could link BIN5 and BIN6 together providing a link road and additional dwellings (map and vision document provided). The larger site would be capable of delivering c.193 dwellings (at 35dph).</p> <p>Specific comments relating to BIN5:</p> <ul style="list-style-type: none"> <li>• Support the allocation for the site.</li> <li>• Support the proposed amendment to the settlement boundary to incorporate the site.</li> <li>• Site is accessed off Forest Road by an existing gate. There is a temporary construction access across BIN5 for work being undertaking for a new golf course design on land west of Wood Lane.</li> <li>• The site is within flood zone 1, so low risk of flooding. Small part of southern boundary is at risk, which could be fully mitigated by a SuDS scheme.</li> <li>• No statutory or non-statutory nature conservation designations for the site.</li> <li>• Site is relatively flat.</li> <li>• Sustainability located with settlement of Binfield and Bracknell is close proximity.</li> <li>• Local facilities of Binfield are within walking distance of the site with regular bus services to Bracknell Town centre.</li> <li>• Provides a logical extension to Blue Mountain.</li> <li>• Based on 35dph (which should be considered as a minimum density), could accommodate 64 dwellings.</li> </ul> <p>(Specific comments relating to new piece of land and BIN6 are summarised under 'non-allocated' sites).</p>

**6.2 Sites allocated for residential/mixed use development (LP4)  
BIN10 Popes Manor, Murrell Hill Lane**

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
454 Historic England (HE)	<p>Site assessed as having a high potential effect on historic environment).</p> <p>Agree with LUC assessment that features west of Murrell Hill Lane is limited.</p> <p>A number of assets are located east of Murrell Hill Lane. LUC report sets out that development is likely to negatively affect the parkland by removal of historic landscape features and loss of the areas of historic character. The assessment identifies potential adverse effects to the setting of Pope's Manor.</p> <p>Para. 194 of the NPPF states that "Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification."</p> <p>HE consider that the allocation of the site would be contrary to the NPPF, as it would result in harm to a designated asset, with no clear/convincing justification offered.</p> <p>The allocation should be reduced in size to exclude the land east of Murrell Hill Lane.</p> <p>If the lane would require upgrading to accommodate development to the western part of the site, to the extent it would have a suburbanising effect, and negatively impact the setting of Pope's Manor, the entire site should not be allocated.</p>
517/518 Binfield Parish Council	<p>The site is contrary to LP1(iv) which aims to protect and enhance natural environment and significance of heritage assets, and Objective B of the Plan.</p> <p>BIN10 and surrounding area of Murrell Hill Lane was also sites in a recent dismissed appeal which referred to ""profoundly rural in its overall character." And "Murrell Hill and Foxley Lanes are themselves tree lined and typical of lanes which would be found in rural locations."</p> <p>The Inspector also found "Murrell Hill Lane is identified as a cycleway in the BNP and included in its map of historic footpaths and bridleways".</p> <p>The Binfield Parish Landscape Character (Kirkham Landscapes, 2017) identifies a number of heritage assets in the area.</p> <p>Proposed development would cause harm to the character and the link with Binfield's Historic past. (Further information also provided in an Appendix to the Parish Council comments).</p>
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
	<b>Infrastructure &amp; highways</b>
050 Moynihan, 075 Davis, 129 Marshall, 153 Myall, 308 Sones, 347 Wharphshire, 365 Glasson, 568 Glover, 583 Smith, 873 Boorman, 933 Glen,	<p>Impact of increased traffic/congestion</p> <p>(including Popewsood which is congested in peak time, and cumulative impact of existing/proposed developments).</p>
075 Davis, 536 Elliott	Impact upon drainage.
050 Moynihan, 075 Davis, 308 Sones, 873 Boorman	Loss of open spaces – should be preserved not built on.
280 Runham	London Road can't take additional traffic – cumulative impact with new development assessing the road.
365 Glasson, 583 Smith, 447 Leary, 536 Elliott	Pressure on local facilities.
	<b>Heritage/Character</b>
050 Moynihan	Building on infill sites does not preserve the heritage of the village.
075 Davis	Impact through loss of open space to history and identity of Binfield.
150 Moynihan, 153 Myall, 280 Runham; 347 Wharphshire, 365 Glasson, 536 Elliott, 583 Smith, 619 S Peacey, 775 J Clarke, 830 Phillips, 873 Boorman, 933 Glen, 619 Peacey	<p>Erosion of parkland setting of grade II listed building/heritage assets. LUC report assesses site as having high sensitivity – Council is going against own evidence base.</p> <p>Also refers to evidence from Mr Mullis re Foxley Oaks appeal.</p>
153 Myall	Too much developed is planned for Tilehurst Lane/Binfield, and should be reduced.
568 Glover	Blurring of boundaries between Binfield Village and Bracknell town.
536 Elliott, 830 Phillips	Urbanisation of rural lane.
830 Phillips	Contradicts existing BFC heritage policies.
	<b>Other</b>
050 Moynihan, 308 Sones, 365 Glasson, 568 Glover, 583 Smith	More sustainable sites for development than this site (and BIN1 & BIN5)
050 Moynihan, 075 Davis, 153 Myall, 365 Glasson, 583 Smith, 873 Boorman	Impact of increased pollution/air quality.
308 Sones	Impact to wildlife
308 Sones	Risk of subsidence.
308 Sones	Risk of flooding
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
<b>PROMOTERS OF OTHER SITES</b>	

565 Turley on behalf of Berkeley Strategic Land Ltd	Not suitable for allocation due to: <ul style="list-style-type: none"><li>• outside the settlement boundary</li><li>• contradicts the spatial strategy</li><li>• harm to Grade II listed Popes Manor</li></ul>
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**6.2 Sites allocated for residential/mixed use development (LP4)  
BIN12 Land South of London Road (Eastern Field)**

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
454 Historic England (HE)	Site BIN12 has been assessed by LUC in the Historic Environment Assessment of SHELAA Sites reports as having either 'low' or 'no' potential effects. HE has reviewed their records and can see no reason to differ on these sites. However, this does not necessarily mean that these sites do not contain archaeological significance and further archaeological investigation, including site evaluations, may be required as part of any planning application.
517/518 Binfield Parish Council <b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	Access should be onto London Road, and not directly onto the dual carriageway.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	No Comments received
766 Willson Development	Express continued support for allocation. It is appropriate because the site: <ul style="list-style-type: none"> <li>- is accessible – good pedestrian and vehicle access, with good public transport links</li> <li>- lies to the south of Amen Corner North and the north of Amen Corner South which will have, facilities that reaffirm the sustainable location of this site.</li> <li>- has limited vegetation constraints, with opportunities to improve site biodiversity and connectivity to the wider area.</li> <li>- is near to jobs at the Western Employment Area;</li> <li>- is in single ownership and is deliverable within the next 5 years (2025/26).</li> </ul>

**6.2 Sites allocated for residential/mixed use development (LP4)  
BIN16 Land between Cain Road and Turnpike Rd (3M Rec Land)**

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b> 454 Historic England (HE)	Site BIN16 has been assessed by LUC in the Historic Environment Assessment of SHELAA Sites reports as having either 'low' or 'no' potential effects. HE has reviewed their records and can see no reason to differ on these sites. However, this does not necessarily mean that these sites do not contain archaeological significance and further archaeological investigation, including site evaluations, may be required as part of any planning application.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
<b>DEVELOPERS / PROMOTERS OF SITES</b>	No Comments received
<b>PROMOTERS OF SITE</b>	No Comments received
<b>PROMOTERS OF OTHER SITES</b>	No Comments received
	No Comments received

## 6.2 Sites allocated for residential/mixed use development (LP4) BIN20 Land Previously reserved for Park & Ride Peacock Farm

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY	
454 Historic England	Site not included in LUC assessment. Agree with site profile which refers to two listed buildings and setting not being harmed. In order to fully understand the significance of the assets and another other archaeological assets (and for consistency) a full assessment of the site must be carried out prior to allocation.
DEVELOPERS / PROMOTERS OF SITES	
PROMOTERS OF SITE	
632 Pegasus on behalf of Redrow Homes and Persimmon Homes Thames Valley	<p>Confirm that the site remains in the control of Redrow and Persimmon, and make the following points in support of the allocation:</p> <ul style="list-style-type: none"> <li>• Site is suitable for residential development, consistent with recent and on-going development of adjoining land parcel (SALP allocation SA2)</li> <li>• Planning permission which would have provided the park and ride has now lapsed (was part of the wider Jennetts Park planning permission), and there is no longer any interest by the Council in bring forward as a Park and Ride.</li> <li>• Site is available and deliverable.</li> <li>• Not aware of any constraints which cannot be overcome/prevent the site from coming forward.</li> </ul> <p>Whilst support the application, concerns raised in relation to the following:</p> <ul style="list-style-type: none"> <li>• Policy LP4 relates to a number of allocations but does not provide any site specific criteria. But supporting text (para 6.32) cross refers to site profiles in Appendix 4. Unclear whether they are intended to have full policy status or whether these are guidance. Clarity needed.</li> <li>• Confusion regarding extent of developable area. <ul style="list-style-type: none"> <li>◦ Policies Map allocates the full site including land at the eastern end (this land remains undeveloped but is allocated for housing under Policy SA2 of the SALP). But on page 137 an indicative developable area which only covers the south western part of the site.</li> <li>◦ Object to the 3<sup>rd</sup> bullet - consider that the allocation should apply to the full site. Unnecessary at this stage to narrow down the developable area.</li> <li>◦ Unduly restrictive to omit the strip of land which runs parallel to the A329. Mindful of the underground cables and drainage issues, but possibly scope to use this land e.g. car parking.</li> </ul> </li> <li>• Potential site capacity considered 200-230 dwellings. To make efficient use of land, the Local Plan should provide flexibility to deliver more housing.</li> <li>• With reference to 'not harm setting of nearby listed buildings', consider policy requirement is inconsistent with the NPPF and Planning (Listed and Buildings and Conservation Areas) Act 1990. Neither impose a nil detriment requirement on development. Where there is harm, this could be weighed against public benefits, and not lead to straight refusal of permission. Wording should be amended to better reflect the NPPF.</li> <li>• Consider Assessments and recommendations should inform the extent of developable area at the time any planning application is submitted, and not prescribe it through the Local Plan process.</li> <li>• Recognise that noise will be a material consideration which will be addressed at the planning application stage.</li> <li>• "Development Management should be contacted for up to date and comprehensive details of requirements." Wording should be deleted. Implies LPA may change the policy requirements of the site within the need for consultation or examination.</li> <li>• The trajectory predicts the site will be delivered 2025/26-2026/27. Subject to planning permission being granted at the end of 2020, completions can be expected 2021/22 and full completions within 3 years of start date.</li> </ul>

## 6.2 Sites allocated for residential/mixed use development (LP4) BRA7 Town Square The Ring

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
454 Historic England (HE)	Site BRA7 has been assessed by LUC in the Historic Environment Assessment of SHELAA Sites reports as having either 'low' or 'no' potential effects. HE has reviewed their records and can see no reason to differ on these sites. However, this does not necessarily mean that these sites do not contain archaeological significance and further archaeological investigation, including site evaluations, may be required as part of any planning application.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
	No Comments received
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
668 Lightwood Strategic	Height, scale and massing study required to justify initial capacity of the site.  Whilst site is assumed to be developable, there is no high level viability appraisal to justify the allocation.  Delivery is in the last 3 years of the plan period, if this is the best case scenario, there is a risk of slippage, which should be reflected in the degree of flexibility of housing land within the Plan.
<b>PROMOTERS OF SITE</b>	
	No Comments received
<b>PROMOTERS OF OTHER SITES</b>	
	No Comments received

## 6.2 Sites allocated for residential/mixed use development (LP4) BRA12 Former Bus Depot, Market Street

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY	
454 Historic England (HE)	Site BRA12 has been assessed by LUC in the Historic Environment Assessment of SHELAA Sites reports as having either 'low' or 'no' potential effects. HE has reviewed their records and can see no reason to differ on these sites. However, this does not necessarily mean that these sites do not contain archaeological significance and further archaeological investigation, including site evaluations, may be required as part of any planning application.
RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS	
	No Comments received
DEVELOPERS / PROMOTERS OF SITES	
	No Comments received
PROMOTERS OF SITE	
751 Savills on behalf of Morgan Sindall Investments	Supports proposed allocation which make an important contribution to: <ul style="list-style-type: none"> <li>the regeneration of the town centre</li> <li>meeting housing and economic needs</li> <li>uses previously developed land effectively in sustainable location</li> <li>help to deliver Council's vision for the town centre.</li> </ul>
751 Savills on behalf of Morgan Sindall Investments	Notes quantum of development has changed from the 2018 Draft Local Plan.
751 Savills on behalf of Morgan Sindall Investments	Considered that allocations should be revised to ensure greater flexibility on how each site is developed for housing and other uses. There is potential to increase density and reduce parking provision due to location with good access to public transport.
751 Savills on behalf of Morgan Sindall Investments	Could be significant changes over the plan period which affect deliverability of sites. Flexible allocations with holistic vision for quantum of development to allow for changing circumstances. Similar approach used in Reading Local Plan where allocations have indicative densities. Within Bracknell Town Centre permission has been granted for developments (Former Bus Depot, Amber House, Winchester House) with higher residential capacities than the proposed allocations (comment includes tables comparing the densities).  Densities should be: <ul style="list-style-type: none"> <li>Market Street – 200 to 300 dwellings</li> <li>Jubilee Gardens – 100 to 150 dwellings</li> <li>Coopers Hill – 70 to 80 residential dwellings</li> </ul>
751 Savills on behalf of Morgan Sindall Investments	LP4 should be revised by either including a range of dwelling capacities in the third column of the table reflecting the ranges sets out above and to include: <i>"the capacities set out in this policy an indicative range of development capacities. The capacity of each site and mix of uses for mixed use sites will depend on various factors that need to be addressed at application stage."</i>
751 Savills on behalf of Morgan Sindall Investments	LP9 should be revised to include: <i>"the capacities set out in this policy are indicative and the amount of economic/mixed use floorspace for each site will depend on various factors that need to be addressed at application stage."</i>
PROMOTERS OF OTHER SITES	
	No Comments received

## 6.2 Sites allocated for residential/mixed use development (LP4) BRA13 Coopers Hill, Crowthorne Road North

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
454 Historic England (HE)	Site BRA13 has been assessed by LUC in the Historic Environment Assessment of SHELAA Sites reports as having either 'low' or 'no' potential effects. HE has reviewed their records and can see no reason to differ on these sites. However, this does not necessarily mean that these sites do not contain archaeological significance and further archaeological investigation, including site evaluations, may be required as part of any planning application.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
<b>DEVELOPERS / PROMOTERS OF SITES</b>	No Comments received
	No Comments received
<b>PROMOTERS OF SITE</b>	
751 Savills on behalf of Morgan Sindall Investments	Supports proposed allocation which make an important contribution to: <ul style="list-style-type: none"> <li>the regeneration of the town centre</li> <li>meeting housing and economic needs</li> <li>uses previously developed land effectively in sustainable location</li> </ul> help to deliver Council's vision for the town centre.
751 Savills on behalf of Morgan Sindall Investments	Notes quantum of development has changed from the 2018 Draft Local Plan.
751 Savills on behalf of Morgan Sindall Investments	Considered that allocations should be revised to ensure greater flexibility on how each site is developed for housing and other uses. There is potential to increase density and reduce parking provision due to location with good access to public transport.
751 Savills on behalf of Morgan Sindall Investments	Could be significant changes over the plan period which affect deliverability of sites. Flexible allocations with holistic vision for quantum of development to allow for changing circumstances. Similar approach used in Reading Local Plan where allocations have indicative densities. Within Bracknell Town Centre permission has been granted for developments (Former Bus Depot, Amber House, Winchester House) with higher residential capacities than the proposed allocations (comment includes tables comparing the densities).  Densities should be: <ul style="list-style-type: none"> <li>Market Street – 200 to 300 dwellings</li> <li>Jubilee Gardens – 100 to 150 dwellings</li> <li>Coopers Hill – 70 to 80 residential dwellings</li> </ul>
751 Savills on behalf of Morgan Sindall Investments	LP4 should be revised by either including a range of dwelling capacities in the third column of the table reflecting the ranges sets out above and to include: <i>"the capacities set out in this policy an indicative range of development capacities. The capacity of each site and mix of uses for mixed use sites will depend on various factors that need to be addressed at application stage."</i>
<b>PROMOTERS OF OTHER SITES</b>	
	No Comments received

## 6.2 Sites allocated for residential/mixed use development (LP4) BRA15 Land E of Station Way and N of Church Road (Southern Gateway)

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
454 Historic England (HE)	Site BRA14 has been assessed by LUC in the Historic Environment Assessment of SHELAA Sites reports as having either 'low' or 'no' potential effects. HE has reviewed their records and can see no reason to differ on these sites. However, this does not necessarily mean that these sites do not contain archaeological significance and further archaeological investigation, including site evaluations, may be required as part of any planning application.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
	No Comments received
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
	No Comments received
<b>PROMOTERS OF SITE</b>	
751 Savills on behalf of Morgan Sindall Investments	Supports proposed allocation which make an important contribution to: <ul style="list-style-type: none"> <li>the regeneration of the town centre</li> <li>meeting housing and economic needs</li> <li>uses previously developed land effectively in sustainable location</li> </ul> help to deliver Council's vision for the town centre.
751 Savills on behalf of Morgan Sindall Investments	Notes quantum of development has changed from the 2018 Draft Local Plan.
751 Savills on behalf of Morgan Sindall Investments	Considered that allocations should be revised to ensure greater flexibility on how each site is developed for housing and other uses. There is potential to increase density and reduce parking provision due to location with good access to public transport.
751 Savills on behalf of Morgan Sindall Investments	Could be significant changes over the plan period which affect deliverability of sites. Flexible allocations with holistic vision for quantum of development to allow for changing circumstances. Similar approach used in Reading Local Plan where allocations have indicative densities. Within Bracknell Town Centre permission has been granted for developments (Former Bus Depot, Amber House, Winchester House) with higher residential capacities than the proposed allocations (comment includes tables comparing the densities).  Densities should be: <ul style="list-style-type: none"> <li>Market Street – 200 to 300 dwellings</li> <li>Jubilee Gardens – 100 to 150 dwellings</li> <li>Coopers Hill – 70 to 80 residential dwellings</li> </ul>
<b>PROMOTERS OF OTHER SITES</b>	
	No Comments received

**6.2 Sites allocated for residential/mixed use development (LP4)  
BRA15 Land E of Station Way and N of Church Road (Southern Gateway)**

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY	
454 Historic England (HE)	Site BRA15 has been assessed by LUC in the Historic Environment Assessment of SHELAA Sites reports as having either 'low' or 'no' potential effects. HE has reviewed their records and can see no reason to differ on these sites. However, this does not necessarily mean that these sites do not contain archaeological significance and further archaeological investigation, including site evaluations, may be required as part of any planning application.
RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS	
DEVELOPERS / PROMOTERS OF SITES	No Comments received
	No Comments received
PROMOTERS OF SITE	No Comments received
PROMOTERS OF OTHER SITES	No Comments received



**6.2 Sites allocated for residential/mixed use development (LP4)  
BRA17 Bus Station, Station Road**

<b>NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT</b>	<b>SUMMARY OF MAIN ISSUES RAISED</b>
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
454 Historic England (HE)	Site not included in LUC assessment. HE high level assessment does not reveal any heritage assets. However, archaeological assets may be present, For consistency, a full assessment of the site must be carried out prior to allocation,
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
	No Comments received
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
668 Lightwood Strategic	Delivery is in the last 3 years of the plan period, if this is the best case scenario, there is a risk of slippage, which should be reflected in the degree of flexibility of housing land within the Plan.  Not clear whether the relocation of the bus station is a barrier to delivery.
<b>PROMOTERS OF SITE</b>	
	No Comments received
<b>PROMOTERS OF OTHER SITES</b>	
	No Comments received

## 6.2 Sites allocated for residential/mixed use development (LP4) Land at Hayley Green – Warfield Neighbourhood Plan site

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
531 Warfield Parish Council	Welcome inclusion of the site in the Plan, and comments that the proposal does not undermine the approach taken in the draft BFLP and the endorsement of the principle of development of the site.
949 Environment Agency	<p>This allocated site is also partly located in Flood Zones 2 and 3. This site must pass Sequential and Exception Tests to ensure that your Local Plan is deliverable and compliant with National Planning Policy Framework paragraphs 157-161.</p> <p>This site is included in table 3a of your Sequential Test which contains 'sites in Flood Zone 3 (not immediately passed the sequential test), that are not proposed for allocation'. Therefore it appears there is no evidence that the site has passed the Sequential Test or the Exception Test. These must be passed for this site to be allocated.</p> <p>It is not clear if the land at Hayley Green site (CLU7), which has been allocated in the emerging Warfield Neighbourhood Plan for 235 homes, is to be included in the Local Plan figures. Please can this be clarified. We note that the site is included in the housing figures in LP4 of Part 1 of the Local Plan.</p> <p>If this site is to be included in the Local Plan housing figures, both the Sequential and Exception Tests should be passed and included in the evidence base.</p> <p><b>Without justification of why land at Hayley Green has been put forward, your plan may be found to be unsound.</b></p> <p>[Comment duplicated under Sequential and Exception Tests section]</p>
369 Wokingham Borough Council	It is understood that examination proceedings have paused due to the lack of an Appropriate Assessment. Therefore, uncertainties remain around the deliverability of this site which, if removed from supply, would mean BFC would not be able to meet its identified allocations need including 10% flexibility buffer.
897 Winkfield Parish Council	Concerned about development bringing additional strain on already overburdened infrastructure in local area.
897 Winkfield Parish Council	<b>Housing</b> - Concerned no detail on type of proposed housing development, would like assurances that if development happens, would be entry level homes for rent/ sale non-transferable to another area. No indications of any employment.
897 Winkfield Parish Council	<b>Retail/ Leisure</b> - No detailed information on scale of 'on site in kind provision' community facility to be provided. Therefore no real plans for built retail, leisure, commercial development so no gain to local community.
897 Winkfield Parish Council	<b>Infrastructure</b> – no details of comprehensive package to be provided. Sewerage and surface water system inadequate. Will exacerbate current situation.
897 Winkfield Parish Council	<b>Community infrastructure/ facilities</b> – no community gain detail provided.
897 Winkfield Parish Council	<b>Climate change mitigation/ conservation</b> – limited information
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
293 Thorin	Out of character and conflict with rural setting.
293 Thorin	Road would require widening and improvements which would change the character.
293 Thorin	Unsustainable in relation to transport and connectivity.
293 Thorin	Sewage issues.
293 Thorin	Flooding issues.
498 S Collings, 615 M Collings	As no site profile is included for Land at Hayley Green, (Neighbourhood Plan allocation) does this mean that the Borough has accepted this site's allocation as per the Warfield Neighbourhood Plan?
421 Murphy	Note that the NP is at examination, and thank the Council for 'standing back' from details of the allocation. Local residents are caught between disagreeing parish and borough councils over the past 20 months. Differing concepts and plans have been unhelpful, divisive, and a travesty of neighbourhood planning. I hope both councils understand the need for an equitable resolution to ensure Hayley Green remains a pleasant place to live.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
	No Comments received
<b>PROMOTERS OF SITE</b>	
965 Jordan Construction	Welcome BFC support for new residential development on site. Landowners committed to supporting WPC and BFC to ensure site delivered in timely manner. Future masterplan will be landscape-led. Intend to do single outline permission.
965 Jordan Construction	Estimate delivery of housing across site could be earlier than 2027. Suggest housing trajectory amended to reflect site could be delivered in next five years.
<b>PROMOTERS OF OTHER SITES</b>	
361 Michael Williams Planning on behalf of Schyde Investments	<p>This site should be substituted by land north of Bowyer's Lane, Moss End. Following reasons given:</p> <ul style="list-style-type: none"> <li>• Site should be designated as Green Belt not housing.</li> <li>• Has a poor relationship to Bracknell town.</li> <li>• Site is subject of a stalled neighbourhood plan examination, related to resolving the need for air quality assessment.</li> <li>• The site is not available for development.</li> </ul>
892 Persimmon/Souter	<p>Object to the Hayley Green site due to its poor relationship with Bracknell town/ sustainability and current position with Neighbourhood Plan - stalled Examination due to air quality issues – refer to email from BFC Officer Mutt Lunn to Examiner dated 28th May 2019.</p> <p>Site is not available for development. Should be deleted and become compensatory Green Belt for Jealott's Hill. Hayley Green could be substituted with WAR4 and WAR5 for 150 dwellings.</p>



## 6.2 Sites allocated for residential/mixed use development (LP4) SAND9 Land at Lower Church Road

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
043 Sandhurst Parish Council	Concerns relating to highways and pedestrian safety.
454 Historic England (HE)	<p>Agree with the LUC assessment of the site as 'medium', and the recommendation relating to "Be sensitive to the setting of the Grade II* St Michael's Church through the site layout (including site access), the style and design of dwellings, and the retention and enhancement of boundary vegetation".</p> <p>Welcome the inclusion of this in the site profile. However, to be consistent with the NPPF, amendments recommended:</p> <p>"Conserve the significance of the gII* St Michael's Church by maintaining an appropriate setting through the site layout (including site access), the style and design of dwellings, and the retention and enhancement of boundary vegetation".</p>
949 Environment Agency	<p>This allocated site is partly located in Flood Zones 2 and 3. This site must pass the Sequential and Exception Tests to ensure that your Local Plan is deliverable and compliant with National Planning Policy Framework paragraphs 157-161.</p> <p>We have reviewed your draft Sequential Test and Exception Test (dated October 2019) which states that the site 'passes the sequential test... due to the fact that the identified development needs cannot be accommodated on sequentially preferable sites within the Draft BFLP'. Table 1b of your Sequential Test states that various sites have not been allocated in Flood Zone 1 as they are 'located within the Green Belt and 'exceptional circumstances' have not been evidenced'. In order for this decision to be justified, you should explain why the Green Belt outweighs flood risk in Bracknell Forest.</p> <p>As part of the site is within Flood Zone 3, the Exception Test would also need to be passed. Your Sequential Test document states that the 'indicative developable area' is entirely within Flood Zone 1, and we welcome this use of the sequential approach.</p> <p>As the site is mostly in Flood Zone 1, it may be possible to change the red line boundary to exclude areas at high risk of flooding.</p> <p><b>Without justification of why SAND9 has been put forward, you plan may be found to be unsound.</b></p> <p>[Comment duplicated under Sequential and Exception Tests section]</p>
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
363 Russell	Impact to local roads, traffic and congestion, pedestrian safety.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
	No Comments received
<b>PROMOTERS OF SITE</b>	
801 Progress Planning (on behalf of Developer)	Consider the proposed allocation of the site a sound approach to assisting in meeting the Council's housing needs. The site is deliverable, and under the control of a house builder.
801 Progress Planning (on behalf of Developer)	<p>Developer of SAND9 has also secured interest in the adjacent site (map provided with presentation) which should be considered as an addition to the development. Suitable buffers could be provided to preserve the amenities of adjoining residential occupiers. The site is deliverable within five years.</p> <p>(Also summarised under omission sites).</p>

**6.2 Sites allocated for residential/mixed use development (LP4)  
WAR9 Land North of Herschel Grange**

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
454 Historic England (HE)	Site WAR9 has been assessed by LUC in the Historic Environment Assessment of SHELAA Sites reports as having either 'low' or 'no' potential effects. HE has reviewed their records and can see no reason to differ on these sites. However, this does not necessarily mean that these sites do not contain archaeological significance and further archaeological investigation, including site evaluations, may be required as part of any planning application.
531, 551 & 553 Warfield Parish Council	Object to site as outside of settlement, and harmful urbanising impact on the character and appearance of the countryside.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
	<b>Natural Environment</b>
114 Blundell, 220 Wing, 234 Reid, 263 O'Neal, 262 M Wing, 584 Scott, 451 Warfield Village Action Group, 878 Gale, 939 Gale, 476 Warfield Environmental Group, 921 R Wallen, 860 C Wallen	Impact on biodiversity: habitats (grasslands, hedgerows, scrub, mature oak trees and woodland), and wildlife (birds, bats, reptiles), loss of connectivity for wildlife.
263 O'Neal, 262 M Wing, 451 Warfield Village Action Group, 878 Gale	Greenspace should be preserved/left wild, due to Climate Change Emergency.
114 Blundell, 220 Wing, 234 Reid, 262 M Wing, 451 Warfield Village Action Group, 939 Gale, 476 Warfield Environmental Group, 921 R Wallen, 860 C Wallen	Impact on the Thames Basin Heaths Special Protection Area. Need to take account of recent European Case Law (People over Wind in Ireland).
114 Blundell, 220 Wing, 234 Reid, 262 M Wing, 451 Warfield Village Action Group, 939 Gale, 921 R Wallen, 860 C Wallen	Impact on horsiculture – several stables/grazing land in the area.
	<b>Character/countryside/Heritage</b>
114 Blundell	Will result in overlooking of existing properties.
114 Blundell, 220 Wing, 234 Reid, 384 Worcester, 263 O'Neal, 262 M Wing, 584 Scott, 443 Moss, 451 Warfield Village Action Group, 939 Gale, 943 Thompson-Parr, 476 Warfield Environmental Group, 921 R Wallen, 860 C Wallen	Overdevelopment of Warfield Street (esp. in addition to committed development), development will undermine/threaten unique (rural) character, openness and heritage. Proposed scale and density out of character with the area.
384 Worcester, 584 Scott, 443 Moss, 451 Warfield Village Action Group, 498 S Collings, 615 M Collings, 771 Bateman, 878 Gale, 939 Gale, 941 Barron, 943 Thompson-Parr, 476 Warfield Environmental Group, 921 R Wallen, 860 C Wallen	Site is outside of the existing settlement, protruding into the countryside. North of Warfield street is currently a physical boundary from existing development to south.
384 Worcester, 451 Warfield Village Action Group	Landscape sensitivity - such as woodland and public rights of way with vantage to countryside/rural setting.
220 Wing, 263 O'Neal, 262 M Wing, 451 Warfield Village Action Group	Number of heritage assets in area. Increase in vehicle movements would have an impact on nearby listed building, Horseshoe House.
220 Wing, 262 M Wing, 451 Warfield Village Action Group	Contrary to BFC Historic Environment Assessment of site which confirms damage to the potential prehistoric, roman, medieval and post-medieval landscape significance.
220 Wing, 262 M Wing, 451 Warfield Village Action Group	Contrary to BFC policy of maintaining a gap between this settlement and Green Belt.
771 Bateman, 941 Barron, 476 Warfield Environmental Group, 921 R Wallen, 860 C Wallen	Urbanising impact
878 Gale, 476 Warfield Environmental Group, 921 R Wallen, 860 C Wallen	Site is within a Character Area
476 Warfield Environmental Group, 921 R Wallen, 860 C Wallen	The LSA indicates that this site cannot be justified for 'infill' as it protrudes into the countryside
	<b>Highways and infrastructure</b>
114 Blundell, 220 Wing, 234 Reid, 384 Worcester, 262 M Wing, 584 Scott, 451 Warfield Village Action Group, 878 Gale, 939 Gale, 943 Thompson-Parr	Highway safety, poor visibility to Warfield Street, narrow winding village street, conflict with road users (including horse riders and pedestrians, including older people), dangerous point of access.
114 Blundell, 220 Wing, 234 Reid, 262 M Wing, 584 Scott, 451 Warfield Village Action Group, 939 Gale	Not a sustainable location – no local amenities such as schools and schools within a reasonable walking distance.

114 Blundell, 220 Wing, 234 Reid, 384 Worcester, 263 O'Neal, 262 M Wing, 584 Scott, 451 Warfield Village Action Group	Flood risk from nearby waterways (Cut & Bullbrook).
114 Blundell, 220 Wing, 234 Reid, 451 Warfield Village Action Group	Inadequate water and waste water systems.
476 Warfield Environmental Group, 921 R Wallen, 860 C Wallen	Concerns regarding additional traffic in the area following the approval (on appeal) of the land north of Newhurst Gardens for 50 houses
	<b>Other</b>
114 Blundell, 220 Wing, 234 Reid, 384 Worcester, 262 M Wing, 263 O'Neal, 438 R Moss, 584 Scott, 451 Warfield Village Action Group, 878 Gale, 939 Gale, 943 Thompson-Parr	Site not required as BFC has a housing land supply, the housing requirement has changed, and there are now additional windfall sites. Therefore, settlement boundary should not change and no building of this greenfield countryside site needed.
114 Blundell, 220 Wing, 234 Reid, 262 M Wing, 451 Warfield Village Action Group, 939 Gale	Other more suitable sites have been identified in the SHELAA such as within settlement and previously developed, which should be used in preference to this site.
450 Stock	Endorse the comments made by the Warfield Village Action Group.
451 Warfield Village Action Group	Proposal should be rejected for the same reasons as refused application 18/00650/FUL (character, biodiversity, surface water drainage, impact to SPA, impact to local infrastructure).
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
	No Comments received
<b>PROMOTERS OF SITE</b>	
	No Comments received
<b>PROMOTERS OF OTHER SITES</b>	
	No Comments received

**6.2 Sites allocated for residential/mixed use development (LP4)  
WINK15 Whitegates, Mushroom Castle**



NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
454 Historic England (HE)	Site WINK15 has been assessed by LUC in the Historic Environment Assessment of SHELAA Sites reports as having either 'low' or 'no' potential effects. HE has reviewed their records and can see no reason to differ on these sites. However, this does not necessarily mean that these sites do not contain archaeological significance and further archaeological investigation, including site evaluations, may be required as part of any planning application.
897 Winkfield Parish Council	Although access changed, consider there are issues with character, adverse impact on wildlife habitats, increased pressure on highways, drainage, pressure on open space and poorly located in adequate accessibility to non-car modes. No retail or leisure planned and no details of employment or community gain.
897 Winkfield Parish Council	<b>Transport</b> - Mushroom Castle access very narrow lane. Additional daily vehicle movements will impact on Chavey Down Road., Not sustainability located, not directly connected to Bracknell by cycle, pedestrian links. Poor bus services. Will add to issues on Forest Road. Not a sustainable location – will result in additional private cars on roads. Combination effect with other developments.
897 Winkfield Parish Council	<b>Biodiversity</b> – need for 'biodiversity net gain' means site should not be allocated, important for itself and wider ecological network. Cannot deliver biodiversity net gain on site with proposed homes.
897 Winkfield Parish Council	<b>Character</b> - Would erode the wooded gap identified in East Bracknell Area Character Assessment.
897 Winkfield Parish Council	<b>Infrastructure</b> - Inadequate existing sewerage and surface water system.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
	<b>Biodiversity</b>
041 Sawford, 089 Lyes, 817 Duncan, 872 Young	Development will require removal of Ancient Woodland, is in proximity to a Local Wildlife Site/Ancient Woodland (Osmans Close woodlands) (no justification for removal)
041 Sawford, 168 Wickens, 278 Wickens, 102 Rodriguez, 377 Prior & Craig, 249 Sawford, 817 Duncan, 872 Young, 746 Hemsley	Loss of habitat/loss of wildlife (Various species referred to: badgers, bats, rabbits, foxes, deer, slow worms, toads, insects, and birds such as owls and woodpeckers).
089 Lyes	Impact of garden lighting upon dark wildlife corridors and bats.
089 Lyes	Fragmentation of woodlands - impact to wildlife corridors.
089 Lyes	Increased predation from domestic pets.
054 Calcutt	Development of the site would be contrary to section 5.1vi of the Plan in relation to 'protect and enhance natural environment'.
	<b>Transport/Access</b>
041 Sawford, 168 Wickens	Only way to access the site is by road – no alternatives.
089 Lyes, 168 Wickens, 223 Chavey Down Association, 377 Prior & Craig	Not sustainability located, not directly connected to Bracknell by cycle, pedestrian links. Poor bus services (162 & 162a).
041 Sawford	Information on application 19/00009/OUT identifies risk of access where Aldridge Close meets Gardener Road, which will be opened up as a through road to the development
056 Calcutt, 377 Prior & Craig	Impact on roads during construction – heavy goods vehicles on a 20mph speed restricted area.
056 Calcutt, 089 Lyes, 278 Wickens, 102 Rodriguez, 377 Prior & Craig, 249 Sawford, 817 Duncan, 818 Manhood, 872 Young	Impact of additional traffic on local roads, including safety, road junctions, pedestrians. E.g., Forest Road/Braziers Lane/Locks Ride, Forest Road/Winkfield Road and Aldridge Park/Gardeners Road.
168 Wickens, 246 Gunn, 284 Gunn, 587 Gunn	Gardeners Road not suitable for access, too narrow.
168 Wickens, 377 Prior & Craig	Carnation estate is already busy with many cars parked on the roads.
246 Gunn, 284 Gunn, 587 Gunn	No room for the access to be improved as housing on one side, and play park on the other.
223 Chavey Down Association	Mushroom Castle Lane is a too narrow
223 Chavey Down Association, 377 Prior & Craig	Creation of a rat run by linking through to Carnation estate.
377 Prior & Craig	Lack of parking for construction vehicles.
746 Hemsley	Gardeners Road extended further than needed.
	<b>Infrastructure</b>
041 Sawford	Recent success stories in BFC have related to larger self-contained communities with facilities such as a schools (Amen Corner, Peacock Farm, Quelm Park, Blue Mountain which won't be achieved on this site.
041 Sawford, 168 Wickens, 278 Wickens, 102 Rodriguez, 249 Sawford, 817 Duncan, 818 Manhood, 872 Young	Impact to existing infrastructure  (e.g. local schools and Doctors are already oversubscribed).
102 Rodriguez	Medium size developments such as this (versus small ones under 10 homes, or large more than 50) are worst option as they create a lot of disruption, but under thresholds for contributions.
	<b>Character</b>
168 Wickens, 377 Prior & Craig	Proposals for flats will not integrate with dwellings currently in Winkfield Row.
102 Rodriguez	The proposals are a big increase for the local area.
377 Prior & Craig	Loss of gap between Winkfield Row and Bracknell
746 Hemsley	Loss of green space which should be preserved for residents
	<b>Other</b>
041 Sawford	Development will contradict the sustainability principles sent out in the Draft Plan (5.1 iii, iv, viii & xi.
168 Wickens	Cumulative impact with other developments currently underway such as Blue Mountain, Amen Corner and Warfield.
246 Gunn, 284 Gunn, 587 Gunn	Site is used by locals for walking and observing wildlife.

377 Prior & Craig	Site is currently in the countryside outside of the settlement, so contrary to the Development Plan.
377 Prior & Craig, 746 Hemsley	Impact to existing residential properties: overlooking/loss of privacy, noise, disturbance and light pollution, loss of peace and tranquility
817 Duncan, 818 Manhood	Climate change implications – should be planting not removing trees.
	Reference also made to representations made on current planning application 19/00009/OUT.
746 Hemsley	Not a natural extension of Carnation Drive Estate. Land under different ownership.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
	No Comments received
<b>PROMOTERS OF SITE</b>	
Wessex Environmental Planning, on behalf of Vanderbilt Strategic and Persimmon Homes (037)	<ul style="list-style-type: none"> <li>• Support the methodology of approach in the site selection process.</li> <li>• Welcome inclusion of WINK15 for 42 dwellings, including 15 affordable homes.</li> <li>• Note the summary of evidence, including the Sustainability Appraisal within the Housing Background Paper – set out this is assured by evidence provided in a current application on the site (ref. 19/00009/OUT).</li> <li>• Small sites such as this will help to meet short term housing requirements.</li> <li>• The site is suitable for residential allocation, and early implementation.</li> </ul>
<b>PROMOTERS OF OTHER SITES</b>	
	No Comments received

**6.2 Sites allocated for residential/mixed use development (LP4)  
WINK34 Land read of Forest View and Oriana, Long Hill Rd and West of Fern Bungalow, London Rd) SALP SA3 extension**

<b>NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT</b>	<b>SUMMARY OF MAIN ISSUES RAISED</b>
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
454 Historic England (HE)	Site WINK34 has been assessed by LUC in the Historic Environment Assessment of SHELAA Sites reports as having either 'low' or 'no' potential effects. HE has reviewed their records and can see no reason to differ on these sites. However, this does not necessarily mean that these sites do not contain archaeological significance and further archaeological investigation, including site evaluations, may be required as part of any planning application.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
<b>DEVELOPERS / PROMOTERS OF SITES</b>	No Comments received
	No Comments received
<b>PROMOTERS OF SITE</b>	No Comments received
<b>PROMOTERS OF OTHER SITES</b>	No Comments received

**6.3 Sites allocated for residential/mixed use development (LP5)  
BRA4 Land at Beaufort Park, Nine Mile Ride (South Rd)**

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
207 & 271 Crowthorne Parish Council	<ul style="list-style-type: none"> <li>The site is part of the strategic gap.</li> <li>Already 68 homes allowed on appeal at the Beaufort office site – the policy does not give consideration to cumulative impacts.</li> <li>The development of the site will narrow the gap between Great Hollands and Crowthorne.</li> <li>2019 Plan has diminished the importance of gaps to landscape function, with no mention of physical impact or preventing coalescence.</li> <li>Provision of green infrastructure should be detailed.</li> <li>The current usage of the pipeline should be available in order to evaluate risk of not or failure to safeguard the pipeline, which should be specified in full.</li> <li>Number of units is subject to further work on implications of flooding, so could be more homes built than identified in the Plan. Would heighten transport impact.</li> <li>Crowthorne/ Wokingham Without will suffer the traffic impact, as assumption is that the egress of choice will be on South Road joining the Nile Mile Ride – already other development nearby. Carriage way is a 'feeder' to Jennets Park and A329/ M4.</li> </ul>
312 and 313 Wokingham Without Parish Council	<ul style="list-style-type: none"> <li>Welcome the reinstatement of the gap between Crowthorne and Bracknell.</li> <li>Disappointed that the function of the gap has been downgraded to landscape character rather than preventing coalescence of settlements. Which is contrary to the evidence base.</li> <li>Need to consider impact on air quality in TBH SPA.</li> <li>Impact on congested junction (Golden Retriever)</li> </ul>
372 Wokingham Borough Council	<ul style="list-style-type: none"> <li>This site has a proposed access onto Nine Mile Ride (B3430) which extends westwards into Wokingham Borough (known to get congested, with few opportunities for upgrades).</li> <li>It is noted that the site capacity has been significantly reduced from 570 proposed in the BFC draft plan to 226 dwellings.</li> <li>Notwithstanding, the site would generate significant extra trips onto this road which would impact upon WBC's wider road network.</li> <li>Wish to remain fully engaged with BFC's transport modelling and Infrastructure Delivery Plan work moving forward to ensure that there are no significant detrimental impacts of planned development on Wokingham Borough.</li> </ul>
317 Bracknell Town Council	<ul style="list-style-type: none"> <li>Allocation supported</li> <li>South Road (private) is not adequate due to traffic from cemetery, crematorium, Great Hollands recreation field, Downshire gold complex.</li> <li>Access from Nine Mile Ride should be via existing roundabout.</li> </ul>
454 Historic England (HE)	Site BRA4 has been assessed by LUC in the Historic Environment Assessment of SHELAA Sites reports as having either 'low' or 'no' potential effects. HE has reviewed their records and can see no reason to differ on these sites. However, this does not necessarily mean that these sites do not contain archaeological significance and further archaeological investigation, including site evaluations, may be required as part of any planning application.
950 Environment Agency	Wastewater should be appropriately disposed of to ensure the underlying geology (including a Secondary A Aquifer) is not polluted and water quality is protected. This approach is in line with paragraphs 170 and 180 of the NPPF.  The site should connect to mains drainage, with any updates to infrastructure completed before occupation. To ensure water quality is protected, we suggest that wastewater/sewerage infrastructure is mentioned within the 7th bullet point of policy LP5.
Binfield Parish Council	No comment.
Warfield Parish Council	No comment.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
	<b>Separation of settlements</b>
077 Grimmett	Bracknell, Wokingham, Binfield, Warfield, Sandhurst etc are merging into one metropolis.
181 Crowthorne Village Action Group (CVAG)	<ul style="list-style-type: none"> <li>Proposal is contrary to existing policies, and previous draft Plan.</li> <li>Cumulative impact of this site within 68 homes allowed on appeal at the Beaufort office site.</li> <li>This proposal will bridge the gap, and coalesce communities.</li> <li>A thin landscape buffer strip as a visual screen will not replace the key function of a strategic gap to prevent coalescence.</li> </ul>
	<b>Climate Change</b>
027 Baldry	A very large number of houses (226) are proposed in addition to 68 houses on the Beaufort Office site. There are environmental implications for climate change, pollution, a reduction in trees. Need green wooded areas to ease climate change.
	<b>Infrastructure</b>
027 Baldry	Concerned that the current infrastructure such as GP surgeries, schools etc are already stretched. Need infrastructure to support these proposals.

	<b>Transport</b>
027 Baldry, 115 Sleight, 077 Grimmett	Local roads can't cope/existing congestion. Highway concerns raised include: <ul style="list-style-type: none"> <li>• South Road is a narrow road and is difficult to exit at either end.</li> <li>• The recreational area and crematorium make parking along South Road difficult at times/impassable.</li> <li>• Nine Mile Ride will become very busy especially at peak times.</li> <li>• Understand that there will be traffic lights replacing the roundabout by the Golden Retriever and the T-junctions may be made more adequate at either end of South Road but no other changes and there will be a lot more traffic.</li> <li>• Cumulative impact with Bucker's Park (TRL)</li> <li>• Undesirable to create a new junction – additional access should be by an other leg on to the new TRL roundabout.</li> </ul>
907 R Wallen, 846 C Wallen	Query whether a new roundabout is proposed off South Road to enable cars from the new estate to turn right onto B3430 (Nine Mile Ride).
	<b>Other</b>
488 Collings, 606 Collings	Insufficient knowledge to comment.
907 R Wallen, 846 C Wallen	Paras 6.36 and 6.37 duplicate.  Fig 5 - a significant area of woodland is to be removed to accommodate the housing. Why can't the housing be put to the north west of the existing building, in the area shown on the concept map as Retained Grassland. Need to retain as many trees as possible.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
<b>PROMOTERS OF SITE</b>	
297 Terence O'Rourke Ltd on behalf of Bracknell Land Ltd and Tingdene Parks Ltd	<ul style="list-style-type: none"> <li>• Support the allocation under LP5.</li> <li>• The site is available for development now.</li> <li>• The site is well related to a range of community facilities within the urban area of Bracknell, and availability of transport links.</li> <li>• Adjoins an outline permission for up to 68 dwellings allowed on appeal at the Beaufort office site.</li> </ul> <p>Representations also made in relation to exclusion of 'The Hideout' from the allocated, which are summarised under 'non-allocated sites'.</p>
<b>PROMOTERS OF OTHER SITES</b>	
358 Michael Williams Planning on behalf of Schyde Investments	This site should be substituted by land north of Bowyer's Lane, Moss End (As an extension of the garden settlement at Jealott's Hill). Following reasons given: <ul style="list-style-type: none"> <li>• The site is not a convincing Bracknell Town urban extension.</li> </ul>
662 Lightwood Strategic	Object on ecological grounds due to the removal of woodland. Further evidence also required in relation to 2.3km circular SANG walk.
679 Quod on behalf of Legal and General Homes Communities (Crowthorne) Ltd (L&G)	Comments made in relation to the former Transport Research Laboratory (TRL) site, Old Wokingham Road, Crowthorne.  The Draft IDP for the Beaufort Park site includes references to TRL site. L&G keen to ensure that reliance upon the former TRL site to provide infrastructure/mitigation of other sites is discussed and agreed at an early stage, and if appropriate, necessary financial contributions are identified to help secure this.
892 Michael Williams Planning on behalf of Persimmon/Souter	Poorly related to Bracknell town.  The Council has constructed a "workable" solution to development via the masterplan. Dismissal of WAR4 and WAR5 is therefore not justified as its possible to achieve a successful synthesis of housing/ buffer space/landscaping/ SANG.
772 Boyer on behalf of JPP Land Ltd and Hodge Developments	Have interest in Beaufort office site.  Client's land is surrounded by the LP5 draft allocation. Whilst the land is not allocated for development in the draft local plan, it has been subject to a recent allowed appeal (October 2019). The Plan should therefore reflect the recent permission, through an amendment to the proposed revised settlement boundary (boundary map provided with representation).
565 Turley on behalf of Berkeley Strategic Land Ltd	<ul style="list-style-type: none"> <li>• Timescale of 2027/28 for commencement is optimistic as masterplan/design code has not been submitted.</li> <li>• Application 18/00655/OUT on the site has already been refused in 2018.</li> <li>• Built development appears in isolation.</li> <li>• Proposal needs to maintain gap between Bracknell, Wokingham and Crowthorne.</li> <li>• Oil pipeline runs through the site. No assessment which indicates the impact on development quantum.</li> <li>• Concerns raised in previous comments on 2018 Draft Local Plan remain.</li> <li>• A comparative assessment of the site with regards to the findings of the SA and Housing Background Paper. Performs no worse than Parkview Farm BRA1.</li> </ul>

**6.4 Sites allocated for residential/mixed use development (LP6)  
SAND5 Derby Field (E Wokingham Rd and S Dukes Ride)**

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
272 Crowthorne Parish Council	<ul style="list-style-type: none"> <li>The site is aspirational, as no alternative open space.</li> <li>Revision to settlement boundary is welcomed, as the CIL would support essential funding in Crowthorne Parish, which the impact on residents and facilities would be greatest.</li> <li>The site would be difficult to access – careful consideration needed to highway safety given proximity to Wellingtonia roundabout, brow of hill by shops, and entrance to train station.</li> <li>Provision of additional car parking for the railway welcomed. However, implementation should be in parallel with Buckler's Park development.</li> </ul>
313 Wokingham Without Parish Council	<ul style="list-style-type: none"> <li>Welcomes additional parking at Crowthorne Rail Station.</li> <li>Disappointed that bus service provision not included.</li> <li>Provision for traffic access to Dukes Ride and Wokingham Road.</li> <li>Number of houses should be reduced for on-site SANG provision.</li> <li>Need to consider impact on air quality in TBH SPA.</li> </ul>
371 Wokingham Borough Council	<ul style="list-style-type: none"> <li>The site partly extends into Wokingham Borough, and has been promoted through WBCs call for sites process: site 5FI046, and the proposed site only includes land wholly within BFC.</li> <li>Notes the site is sustainability located next to Crowthorne train station, but there are capacity issues with the car park, which has led to on-street parking on local roads within Wokingham Borough.</li> <li>Options to improve the capacity of Crowthorne station parking should be progressed.</li> <li>Given part of the site is located within Wokingham Borough, WBC would expect development to contribute to necessary local road improvements within Wokingham Borough, particularly Wellingtonia Roundabout, and Dukes Ride.</li> <li>Wish to remain fully engaged with BFC's transport modelling and Infrastructure Delivery Plan work moving forward to ensure that there are no significant detrimental impacts of planned development on Wokingham Borough.</li> </ul>
454 Historic England (HE)	Site SAND5 has been assessed by LUC in the Historic Environment Assessment of SHELAA Sites reports as having either 'low' or 'no' potential effects. HE has reviewed their records and can see no reason to differ on these sites. However, this does not necessarily mean that these sites do not contain archaeological significance and further archaeological investigation, including site evaluations, may be required as part of any planning application.
951 Environment Agency	<p>Wastewater should be appropriately disposed of to ensure the underlying geology (including a Secondary A Aquifer) is not polluted and water quality is protected. This approach is in line with paragraphs 170 and 180 of the NPPF.</p> <p>The site should connect to mains drainage, with any updates to infrastructure completed before occupation. To ensure water quality is protected, we suggest that wastewater/sewerage infrastructure is mentioned within the 6th bullet point of policy LP6.</p>
Binfield Parish Council	No comment.
Warfield Parish Council	No comment.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
116 Sleight	Queries what is meant by 'additional car parking' at Crowthorne station, as this is unquantified. Existing access to the car park and provision of parking is poor. Commuter parking overflows to adjacent residential roads. Parking should be provided by a planning conditions, and revised access as part of access to Derby Field.
183 Crowthorne Village Action Group (CVAG)	<ul style="list-style-type: none"> <li>Welcome the inclusion of parking at the station.</li> <li>Welcome the amended settlement boundary, which would mean it would be part of Crowthorne and the Crowthorne Parish would receive the funding to support additional residents.</li> </ul> <p>However, outstanding matters to be addressed:</p> <ul style="list-style-type: none"> <li>Note the requirement for a comprehensive transport plan – welcomed as a regular bus service between the station and High Street could relieve some issues such as parking at the station, parking in the high street, and air pollution issues. However, more detail is required.</li> <li>Access to the site – short section of Dukes Ride between the station and Wellingtonia roundabout is busy, with views restricted by the station bridge. Without suitable access, new housing on the site is unsound.</li> <li>There is no provision for on-site SANG, without an identified SANG, the policy is unsound.</li> </ul>
363 Russell, 160 Spruce	Impact to local roads, traffic and congestion, highway safety.
363 Russell	Impact to air quality/pollution.
489 Collings, 607 Collings	Insufficient knowledge to comment.
847 C Wallen	Typo 6.42 - sparadic
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
<b>PROMOTERS OF SITE</b>	
975 Wellington College	Support allocation of Derby Fields. Provided an illustrative Masterplan and Vision Document along with representation.
975 Wellington College	For flexibility to make efficient use of land, suggest amending policy in relation to dwelling capacity: <b>"Approximately 217 residential units (including 76 affordable homes)"</b>
975 Wellington College	Flexibility needed to account for changing market conditions in relation to serviced plots. Suggest amend: <b>"Up to 5% of dwellings will be sought as serviced plots for sale to custom builders, having regard to market demand;"</b>
975 Wellington College	Requirement for Active on-site Open Space Public Value should be amended to enable part provision on site, and financial contribution towards off-site provision. Suggests: <b>"On-site Active Provision of Open Space of Public Value to meet the needs of the new community"</b>
975 Wellington College	Consider wording relating to transport measures should be amended to read: <b>"A comprehensive package of appropriate on and off-site transport measures..."</b>



975 Wellington College	Inappropriate for Policy LP6 to require masterplan to be submitted for approval of BFC prior to any planning applications being submitted. Illustrative masterplans should be assessed and determined through application process. Request wording amended as follows: <del>"A Masterplan and design code to be <b>should be</b> submitted to and approved by the LPA prior to any planning application submissions as part of any forthcoming planning application submission..."</del> Reference to design code should be removed or explicitly referred to as a requirement alongside the future reserved matters planning application.
<b>PROMOTERS OF OTHER SITES</b>	
359 Michael Williams Planning on behalf of Schyde Investments	This site should be substituted by land north of Bowyer's Lane, Moss End. Following reasons given: <ul style="list-style-type: none"> <li>• Peripheral site with no relationship to Sandhurst, Crowthorne or Bracknell Town.</li> <li>• No sense of being available.</li> <li>• No alternative open space option.</li> <li>• No masterplan.</li> <li>• No means to mitigate gap requirement (Crowthorne-land to south).</li> </ul>
571 Woolf Bond Planning on behalf of Warfield Park Homes, 589 Woolf Bond Planning on behalf of JPP Land Ltd, 697 Woolf Bond Planning on behalf of JPP Land Ltd	Object to inclusion of the site on the following grounds: <ul style="list-style-type: none"> <li>• Better alternatives exist</li> <li>• Loss of open space contrary to NPPF (para. 217)</li> <li>• No assessment of value of open space undertaken, and no justification for development.</li> </ul> (Object to omission of sites WINK17, WINK18 & BIN17 – see summary of comments on non-allocated sites).
663 Lightwood Strategic	Whilst the site is in a sustainable location next to Crowthorne train station, it is not clear how a bespoke SANG can be provided with a 2.3km circular walk. Until there is a replacement for the playing fields, the site cannot be deemed developable.
679 Quod on behalf of Legal and General Homes Communities (Crowthorne) Ltd (L&G)	Comments made in relation to the former Transport Research Laboratory (TRL) site, Old Wokingham Road, Crowthorne.  The Draft IDP for the Derby Field site includes references to TRL site. L&G keen to ensure that reliance upon the former TRL site to provide infrastructure/mitigation of other sites is discussed and agreed at an early stage, and if appropriate, necessary financial contributions are identified to help secure this.
892 Persimmon/Souter	Peripheral site with no relationship to Sandhurst, Crowthorne or Bracknell town; not available as no alternative open space option. Also no masterplan shown; no means of mitigating the gap requirement (Crowthorne and land to the south). No justification compared with the omission of WAR4 and WAR5 which is available for development within 3 years.

## 6.5 Sites allocated for residential/mixed use development (LP7)

This is a summary of the comments received regarding policy LP7 Land at Jealott's Hill. Comments have been summarised according to the nature of the comment made by consultees (e.g. 'Impact upon road infrastructure within the borough, including:') with further more specific comments noted in the subsequent bullet points (e.g. 'Roads are already heavily congested/gridlocked and unable to cope with additional movement'). **Please note**, not all consultees have raised all the issues listed within the bullet points.

<b>Land at Jealott's Hill, Warfield</b>	<b>SUMMARY OF MAIN ISSUES RAISED</b>
<b>NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT</b>	
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
<b>General / Principle / Misc.</b>	
020 Bray PC	Accepts existing building footprint on the site is previously developed land.
020 Bray PC	Site should not be allocated as it goes above the Borough's housing need.
044 Sandhurst Town Council	Fully support the proposal.
879 Royal Borough of Windsor and Maidenhead	RBWM object to the proposals for Jealott's Hill. Proposals will significantly impact RBWM, given its proximity to RBWM.
898 Winkfield Parish Council	Cannot support or object to proposals due to limited detail.
<b>Green Belt</b>	
020 Bray PC	Funding to maintain Syngenta on the site is not an exceptional circumstance.
020 Bray PC	Site is isolated in Green Belt; removing from the Green Belt would be unacceptable and would allow for other isolated Green Belts sites to come forward.
370 Wokingham Borough Council	The site is located wholly within the Metropolitan Green Belt and therefore exceptional circumstances will need to be demonstrated to release land for development.
517 Binfield Parish Council	BPC does not support the housing development in the green belt. The science park could be developed without the need for housing on site.
517 Binfield Parish Council	As an area of open green belt, currently unspoilt and undeveloped, this is currently a benefit to the environment. The proposed development of 4,000 homes would be a very visible detriment to the green belt.
532 Warfield Parish Council	Contributes to all five purposes of the Green Belt, the most significant being 'safeguarding the countryside from encroachment'.
879 Royal Borough of Windsor and Maidenhead	The site is isolated in Green Belt and is largely fields and woodland, and thus makes a substantial contribution to the openness of the Green Belt.
879 Royal Borough of Windsor and Maidenhead	Proposals would have a significant detrimental impact on the openness of the Green Belt in this part of RBWM, given the adjacent location and the large amount of built form proposed.
879 Royal Borough of Windsor and Maidenhead	Exceptional circumstances have not been demonstrated, and the future operation of the existing facility by development of a new settlement does not outweigh the resultant considerable harm to the Green Belt. Proposal would also constitute over-development of Green Belt.
882 Royal Borough of Windsor and Maidenhead Highways technical note	Argument for removing site from Green Belt appears weak, and there is little evidence that alternatives to enabling development have been considered and discounted in order to secure the future research facility.
898 Winkfield Parish Council	Response to Winkfield NDP show that Winkfield Parish residents thought it was important to keep the Green Belt.
898 Winkfield Parish Council	There is already sufficient brownfield land at Jealott's Hill to create a science park without building on Green Belt land.
898 Winkfield Parish Council	Whilst the site is not entirely accessible to the local population, it is not clear why it was not changed from Green Belt during the recent Green Belt review.
<b>Transport</b>	
020 Bray PC	Impact on traffic due to additional movement (specific details given – A330).
020 Bray PC	No evidence given on how traffic impacts will be mitigated.
020 Bray PC	Potential to impact AQMA (specific details given - A330).
292 White Waltham Parish Council	Extremely concerned about proposal to develop 4000 homes at Jealott's Hill. Proposed development is adjacent to parish boundary and extra traffic movement of up to 10,000 vehicles per day, will pass along A330 to Maidenhead and along Drift Rd to reach M4 junctions 8/9. Will have a devastating impact on parish roads already gridlocked at 8am and 4pm each weekday. Church Hill, White Waltham already has serious problems regarding out of date sewage and drainage works due to the mass of vehicle movements during peak times.
517 Binfield Parish Council	The location is not sustainable and would likely be mostly car dependent, leading to a significant increase in traffic movements throughout the area. It is especially important for affordable housing to be in sustainable locations with easy access to public transport.
879 Royal Borough of Windsor and Maidenhead	Proposals will significantly impact RBWM, given key routes to Maidenhead (including Elizabeth Line station) and M4 J8/9 traversing significant parts of RBWM.
879 Royal Borough of Windsor and Maidenhead	The site is isolated and in an unsustainable location, with inadequate public transport encouraging car use for access to employment and facilities. Proposal is thus irresponsible in relation to sustainability and climate change.
879 Royal Borough of Windsor and Maidenhead	Detrimental impact on roads in surrounding areas (Hawthorn Hill, Holyport, Bray, Ascot), some of which are already congested during rush hours (including A3095 and A330 towards Drift Road roundabout and M4, M40 and A404(M)).
882 Royal Borough of Windsor and Maidenhead Highways technical note	RBWM Highways technical note states: <ul style="list-style-type: none"> <li>• RBWM's Highways Authority objects to the proposals. Location is not sustainable and will significantly impact highway and transport networks within RBWM, particularly along A330/A308 corridor.</li> <li>• Proposal is not consistent with NPPF, as it does not focus development within most sustainable locations and is unlikely that the location could be made more sustainable, fully mitigating traffic impacts.</li> <li>• A comprehensive transport assessment will be required, supported by extensive modelling on likely impacts on wider area (extending along A330/A308 corridor as far as A4 as well M4 J8/), if proposal is pursued.</li> </ul>

898 Winkfield Parish Council	<p>Considering LP12 infrastructure, it would be impossible to build 4,000 homes without major new infrastructure and the proposal thus likely requires serious amendment. WPC would struggle to support the proposal without sight of an IDP that addresses:</p> <ul style="list-style-type: none"> <li>Local road network. Current proposed improvements would be inadequate for the increase in vehicle movements (gives calculations). Request sight of the traffic model.</li> <li>Surrounding road network. Roads in Warfield and Winkfield are already seriously congested with traffic travelling between strategic roads (M3, M4, M25, M40) bringing high levels of pollution. Major investment in new roads and major improvements to existing roads and junctions is required to avoid increased congestion.</li> <li>Site is not served by public transport and is not within walking distance of any. As a minimum, comprehensive, regular and frequent bus service should be provided, linking site to neighbouring facilities and services, as soon as any housing on-site is inhabited to avoid forced car use. May need to run at a loss for some years, so funding would be required.</li> <li>Dedicated cycle route should be provided between site and Bracknell cycle network to ensure cycling is safe and viable.</li> </ul>
<b>Historic Environment</b>	
455 Historic England	<p>We agree with the assessment made by LUC and with the guidance in respect of appropriate understanding of the nature and significance of the historic environment. While some references to the historic environment have been taken through to policy LP7 and associated profile, the detail is less than the recommendation in the LUC report. If site profiles are to be used that guidance could usefully be contained within the site profile.</p> <p>We also agree that a masterplanning approach is needed for these sites, particularly given their size. It is of high importance that the work to fully understand the historic environment is done ahead of the masterplanning work, so that the masterplanning work can respond to this evidence. If these sites are allocated, the masterplanning process should consider how the NPPF requirement of a positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment. The historic environment can be an important part of the design of new places, helping to provide distinctiveness and character.</p>
<b>Landscape / Ecology / character</b>	
532 Warfield Parish Council	Loss of Jealott's Hill Community Landshare orchard is contrary to Biodiversity Action Plan.
879 Royal Borough of Windsor and Maidenhead	Internationally and nationally designated sites lie within RBWM and within 7km of the proposed development. An appropriate assessment therefore needs to be undertaken. This needs to include the cumulative effects with other developments in the area.
879 Royal Borough of Windsor and Maidenhead	Priority habitats are adjacent to site in RBWM. Assessment into the impact (direct loss/fragmentation, air pollution, recreational pressure and impacts from cats/dogs) on these will be required. Avoidance, mitigation and/or compensation measures may be required. Compensation, in the form of on or offsite biodiversity offsetting will also need to be assessed and included if appropriate.
879 Royal Borough of Windsor and Maidenhead	Carbon emissions from construction and future use will be very significant, worsening climate change and contrary to national targets to become carbon neutral. Proposal may result in requirements for new roads, road widening and junction improvements, resulting in loss of significant roadside vegetation including important hedgerows and boundary trees. Vehicles would create emissions, noise and visual intrusion and impact surrounding vegetation, ecology and RBWM residents.
879 Royal Borough of Windsor and Maidenhead	The site's elevation above surrounding land would cause development to be prominent across local and wider area, causing significant detrimental impacts on quality of landscape resources of RBWM. Light pollution would worsen within RBWM and would be viewable from tens of miles away.
879 Royal Borough of Windsor and Maidenhead	Resources required for building the development are likely to have impacts off site, adversely affecting water, land, soil and biodiversity. Residues and emission are likely during construction and future use. Development may affect the hydrology of local area including RBWM, impacting vegetation/species outside of development footprint.
898 Winkfield Parish Council	LP45 Protection and enhancement of trees and hedgerows should be adhered to and enforced on development on this site.
898 Winkfield Parish Council	BFC should reconsider necessity for housing along edge of Maidenhead Road given landscape value of existing vista. Some vegetation may have to disappear, but retention of the majority of it could camouflage housing development, retaining semi-rural character. Almost all residents support this.
898 Winkfield Parish Council	How will severe impact on biodiversity, due to destruction of habitats supporting many protected species, be mitigated?
898 Winkfield Parish Council	Warfield is not an extension of Bracknell town, it is a large and diverse semi-rural parish. Balance between economic growth and protection of countryside's land assets must be achieved, as public/local residents care about their environment and do not want permanent damage caused by excessive development.
<b>Housing</b>	
532 Warfield Parish Council	Housing not required to meet local housing need.
532 Warfield Parish Council	Developer recommends higher capacity (4,000 units) than the 2019 SHELAA (3,505 units).
879 Royal Borough of Windsor and Maidenhead	Proposal results in housing provision well above BFC target, making allocation at this stage questionable.
879 Royal Borough of Windsor and Maidenhead	Not aware of any duty to co-operate discussions between BFC and other authorities, including Slough, to ascertain whether over-provision could meet other unmet needs. Bracknell Forest falls within the area of search identified in the Wider Area Growth Study - Part 1.
<b>Economic Development</b>	
532 Warfield Parish Council	<p>Recognises importance of site for employment, economic activity, agrochemical development and that research has changed however:</p> <ul style="list-style-type: none"> <li>What evidence is there that companies will move to Jealott's Hill?</li> <li>What evidence is there that enabling development is required to help fund the investment needed?</li> <li>Is there a commitment from the occupier to the site long term and what would happen if they withdrew?</li> </ul>
553 Warfield Parish Council	Site should be designated as an employment area. The site contributes significantly to the employment land supply for class B uses (B1 research and development of products and processes) and meets the council's objective of supporting economic growth and resilience.
898 Winkfield Parish Council	No detail provided on class of employment proposed. Would like to see a large varied mix including provision for start-up professional businesses, office space, warehousing as well as retail and leisure if proposal goes ahead. These should provide jobs for some of the new residents, reducing the increase of the burden on local road infrastructure. This should, however, be balanced against the need to drive footfall into Bracknell town centre.
<b>Infrastructure</b>	
106 South East Water	South East Water will need to lay water mains to reinforce the existing infrastructure in order to support the planned 4,000 new dwellings at Jealott's Hill.
327 Surrey County Council	Welcomes provision of three primary and one secondary school. This will obviate any displacement factor that could otherwise impact on school place provision in Surrey.
405 Department for Education	Welcomes the requirement for 3 primary schools and a secondary school

532 Warfield Parish Council	<ul style="list-style-type: none"> <li>Road network insufficient Little evidence of how transportation to and from the site would take place</li> <li>Site bordering another local authority area and would have a significant impact beyond the boundaries of Council.</li> <li>Significant investment on a regional/national basis would be required to deliver improvements.</li> <li>Lack of accessible access to the public transport network</li> <li>'Self-containment of journeys within the site' is a worthy objective relatively few residents are likely to live and work on-site and with no provision for some basic facilities during the plan period i.e. secondary school) significant journeys off-site would be required. Expect proposals to be complaint with policy LP13 Transport principles.</li> </ul>
532 Warfield Parish Council	Provision of 1 primary school during the plan period and no commitment during the plan period for delivery of community facilities including retail, healthcare and community hub is inconsistent with spatial provision in para 4.21
898 Winkfield Parish Council	Development will bring additional strain on already overburdened local infrastructure.
898 Winkfield Parish Council	More detail on flooding, drainage and sewage required. What does 'Sustainable Drainage Systems' mean?
898 Winkfield Parish Council	Pleased to see inclusion of a Primary Healthcare Facility and schools, but stringent conditions need to be used to ensure these are provided alongside the inhabitation of first dwellings, unlike Jennetts Park store.
<b>Plan-making</b>	
527 Warfield Parish Council	Inconsistency on the language used to describe the proposals for Jealott's Hill (garden village, garden settlement and garden village principles). Recommend a consistent approach or an explanation given as to why different terms are used.
532 Warfield Parish Council	Proposal is of national and international importance and should be subject to more detailed consultation and investigation than a Local Plan.
532 & 551 Warfield Parish Council	Evidence required to appraise proposal not available or incomplete e.g. transport and site features including missing the copse at Wellers Wood, Drown Boy pond, recycling centre, utility infrastructure and Jealott's Hill Community Landshare including orchard. Would expect to see as a site-specific requirement for the protection of Drown Boy Pond and Wellers Wood and the existing community Landshare project site and orchard.
532 Warfield Parish Council	Notes the significant issues raised by the Council in the supporting documents (including Housing Background Paper, heritage assessments, Strategic Flood Risk Assessments, accessibility statements, ecologic assessments and waste water treatment). Concerned that the Council considers that these issues could be addressed through development management making the site suitable for allocation. This approach is not supported.
879 Royal Borough of Windsor and Maidenhead	The minimal engagement with RBWM causes considerable concern. BFC has thus not fulfilled the Duty to Co-operate requirements and should remedy this through the next stages of plan-making. Considerable further work needs to be undertaken by BFC in relation to justification and cross boundary working.
882 Royal Borough of Windsor and Maidenhead Highways technical note	Proposal appears at odds with other policies and evidence set out within the Draft Revised Growth Strategy by over-providing housing and employment relative to agreed needs and targets.
898 Winkfield Parish Council	Policy LP7 should have more stringent wording preventing changes/amendments to the plan which would have detrimental impact on the local area, as has happened numerous times before.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
<b>General / Principle / Misc.</b>	
026 Buffett, 097 Hughes, 208 Earl, 401 Donaldson, 577 Mullier	Support the proposed development of the site (overall), including: <ul style="list-style-type: none"> <li>Support the live/work garden village providing integrated economic and social development.</li> <li>Removes less suitable sites in south Winkfield from the Local Plan</li> </ul>

<p>002 &amp; 003 &amp; 322 Bonfante, 021 Leach, 046 Gale, 057 Maidens Green Society, 067 Fernandez, 068 Boyd, 070 Richards, 076 Rothwell-Boyd, 079 Richards, 081 Keys, 091 Rimmer, 092 Pearson, 094 Barlow, 095 Young, 108 Fernandez, 109 Hayden Kellard, 112 Mitchell, 120 Sparkes, 121 Cox, 122 Cox, 123 Collins, 130 Hawkes, 131 Hazell, 132 Beck, 136 Duncan, 137 Jones, 140 Tillet de Clermont-Tonnerre, 147 Bowen, 148 Graver, 149 Elmes, 325 Bainborough, 151 Kingston, 154 Willatts, 156 Hill, 157 Hill, 164 Midson, 167 Kingston, 169 Robinson, 170 Grace, 171 Sergeant, 174 Kingston, 175 Bown, 176 Stok, 177 Gates, 178 Stok, 187 Collinson, 188 Ehinger, 190 Elmes, 191 CPRE, 192 Parkinson, 193 Sauven, 194 Etherington, 196 Mead, 197 Parkinson, 201 Deplodge, 210 Woodbridge, 212 Gates, 213 Makins, 228 Manoukian, 237 Dunn, 233 Newnham, 238 Beni, 244 Gates, 261 Scutt, 265 Mackenzie, 267 Smith, 273 Waddington &amp; Waddington, 274 Hayes, 275 Painter, 276 Street &amp; Street, 287 White, 301 Greenwood, 310 Osada, 314 Chambers, 316 Devitt, 323 Lumley, 324 Hooker, 331 Lumley, 332 Dimbleby, 348 Sauven, 349 Hirst, 350 Moriarty, 364 Griffiths, 374 Oakley Green &amp; Fifield Residents Association, 375 Stock &amp; Stock, 376 Holburn, 385 Cruz-Rimmer, 386 Rimmer, 388 W Taylor, 389 Popplewell, 390 Harries, 391 MacKenzie, 422 Murphy, 442 Yates, 446 Brant, 462 Richmond, 466 Warfield Environmental Group 470 Warner, 471 Derbyshire, 562 Haan, 563 Bradley, 581 Taverner, 582 Bell, 586 Fazey-Gunn, 650 Sparkes, 684 Sparkes, 745 Sandhu, 747 Sandhu, 767 Young, 768 Seaman, 769 Cole, 788 Blackburn, 794 Jones, 796 Bartlett, 798 Bridges, 799 Saadetian, 803 Squires, 807 Jones, 808 Manoukian, 809 Jones, 810 Plumb, 811 Bridge, 812 Bridge, 815 Barlow, 819 Olivian, 820 Browne, 821 Browne, 832 Manoukian, 836 Ehinger, 838 Belie, 839 Griffiths, 884 Manoukian, 925 Cope, 927 Fitzell, 928 Blakemore, 933 Glen, 936 Lloyd, 942 Barron</p>	<p>Strongly object/object to proposed development of the site (overall).</p>
<p>030 Holyport Residents Association, 036 Gibson, 062 Smith, 069 Gay, 072 Robinson, 073 Stroud, 084 Turner, 088 Jones, 172 Ramsdale, 256 Manning, 257 Rogers, 300 Redman, 315 King, 328 Manning, 484 S Collings, 608 M Collings, 393 Kedward, 403 Browne, 404 Hurtado, 441 Lawrence, 543 Spendlove, 560 Turner, 563 Bradley, 585 Martin, 869 Doughty, 934 Kedwards, 964 Turner</p>	<p>Strongly object/object to proposed development of housing on the site.</p>
<p>191 CPRE, 273 Waddington &amp; Waddington, 417 Murphy, 484 S Collings, 465 Warfield Environmental Group, 769 Cole, 928 Blakemoor</p>	<p>Comments relating to the terms garden settlement/garden village, including:</p> <ul style="list-style-type: none"> <li>• The term 'garden village' is inappropriate, given failure to engage with the local community. Community involvement at all stages is a key requirement of the garden settlement scheme (MHCLG 2018 Garden Communities, paragraph 12) and local community is not engaged. All terms including 'garden' label should be removed as premature. Needs to be assessed as a proposal for 4000 houses in Green Belt.</li> <li>• The term 'village' is misleading – development would be a small town.</li> <li>• Garden settlement, garden village? Be consistent in terms used and provide a definition.</li> <li>• The proposal has been represented as a new village with all of the required amenities – rather utopian and naïve – a nice idea but not necessarily practical. It is a new town.</li> </ul>
<p>484 S Collings</p>	<p>Para 6.50 is incorrect – 215 ha Green Belt will be lost.</p>

466 Warfield Environmental Group, 484 S Collings, 841 Wallen, 902 Wallen	<p>Para 6.54:</p> <ul style="list-style-type: none"> <li>the majority of the land to be lost is not greenfield, it is Green Belt.</li> <li>Should say greenfield/Green Belt.</li> </ul>
<b>LOCATIONAL PRINCIPLES (relating to this site)</b>	
140 Tillette de Clermont-Tonnerre, 257 Rodgers, 376 Holburn, 469 Bottwood, 561 McArthur, 788 Blackburn, 925 Cope	<p>Focus housing needs on all current possible brownfield sites, including:</p> <ul style="list-style-type: none"> <li>Green Belt should not be developed.</li> <li>Sub-standard or empty buildings should be developed.</li> </ul>
025 Fernandes, 067 Fernandez, 130 Hawkes, 194 Etherington, 198 Fall, 349 Hirst, 841 Wallen, 902 Wallen	<p>Alternative spatial approaches recommended in regard to housing:</p> <ul style="list-style-type: none"> <li>Edge of settlement sites are better located and far more acceptable - allow new housing developments to grow organically around the perimeter of the town, rather than establishing an isolated new settlement.</li> <li>Small scale housing/infills strongly preferred over one or two large scale sites as they are easier to integrate, less likely to damage character and less likely to add pressure to existing road infrastructure.</li> <li>The policy should be to reinforce Town centre and existing villages where necessary (Binfield, Hayley Green, Chavey Down, Warfield) where sustainability can be improved.</li> <li>Currently there is a lack of empathy from the Council towards Warfield and Binfield; development should be more evenly spread across the borough.</li> <li>'Vertical' development of Bracknell town centre is a more appropriate way of generating new housing with minimal transport requirement (carbon footprint) and minimal encroachment on the Green Belt.</li> </ul>
146 Bell	<p>Query why land to the south of London Road which is well connected has been dropped in favour of an isolated Green Belt site.</p>
025 Fernandes, 064 Sparkes, 067 Fernandez, 068 Boyd, 076 Rothwell-Boyd, 083 Money, 085 Cope, 091 Rimmer, 101 Bowler, 113 Monks, 124 Kingston, 139 Fitzwilliams, 140 Tillette de Clermont-Tonnerre, 146 Bell, 149 Elmes, 151 Kingston, 162 Midson, 167 Kingston, 174 Kingston, 175 Bown, 176 Stok, 178 Stok, 190 Elmes, 192 Parkinson, 193 Sauven, 196 Mead, 197 Parkinson, 198 Mead, 201 Depodge, 217 Mackenzie Dodds, 257 Rodgers, 265 Mackenzie, 273 Waddington & Waddington, 276 Street & Street, 307 Brunander, 322 Bonfante, 323 Lumley, 325 Bainborough, 331 Lumley, 348 Sauven, 349 Hirst, 374 Oakley Green & Fifield Residents Association, 380 Barlow, 388 Taylor, 391 MacKenzie, 393 Kedward, 684 Sprakes, 769 Cole, 794 Jones, 815 Barlow, 836 Ehinger, 839 Griffiths, 933 Glen, 934 Kedwards, 942 Barron	<p>Potential to redevelop existing brownfield land at Jealott's Hill, including:</p> <ul style="list-style-type: none"> <li>Having worked at Syngenta for 12 years, can categorically stipulate that there is sufficient brownfield built-on land within the existing Syngenta Jealott's Hill site to build the proposed science and innovation park to protect their existing jobs and create 1200 more without loss of Green Belt.</li> <li>Having worked at Syngenta for 11 years, there is sufficient brownfield built-on land within the existing Syngenta Jealott's Hill site to build the proposed science and innovation park, to protect existing jobs and create more. The reduction in facilities and staff over the last 10 years will have left a void that can be filled without excessive development.</li> <li>There is more than adequate brownfield land on the current Syngenta footprint to accommodate all their proposed requirements.</li> <li>Syngenta intends to reduce the square metres it uses after development has taken place – therefore if the private company is able to reduce square metres required while increasing the number of jobs on the site then no additional development is required on the site and the Green Belt boundaries do not need to be removed.</li> <li>Sufficient brownfield land within its curtilage to adapt and expand its business to meet changing needs (office/lab rather than large scale field testing).</li> <li>Science and innovation park may have some standalone merit, but this does not necessitate a garden village over the whole site/there is not special need for housing.</li> <li>Redevelopment of existing brownfield in principle seems reasonable; however, would still be large and require significant justification.</li> <li>A smaller development, such as a larger office block, would be understandable but a new settlement is not.</li> <li>Residential development on brownfield areas would be reasonable, though even a development of less than 400 homes would require significant justification.</li> <li>Policy GB5 of the Bracknell Forest Borough Local Plan supports limited infilling and would provide sufficient space to improve/rebuild existing research facility/fit the proposed science park.</li> <li>Nationally important centre for scientific research can be met without sacrificing irreplaceable Green Belt.</li> </ul>
025 Fernandes, 082 Jenkins, 085 Cope, 096 Hartley, 101 Bowler, 109 Hayden Kellard, 124 Kingston, 147 Bowen, 151 Kingston, 149 Elmes, 167 Kingston, 174 Kingston, 175 Bown, 176 Stok, 178 Stok, 188 Ehinger 193 Sauven, 217 Mackenzie Dodds, 265 Mackenzie, 273 Waddington & Waddington, 276 Street & Street, 307 Brunander, 323 Lumley, 331 Lumley, 349 Hirst, 633 Bridges, 391 Mackenzie, 767 Young, 769 Cole, 794 Jones, 798 Bridges, 806 Mcalister, 814 Mcalister, 815 Barlow, 816 Gurney, 828 Strange, 829 Mcalister, 833 Mcalister, 870 Bridges, 925 Cope, 928 Blakemoor, 942 Barron	<p>Potential to relocate existing business:</p> <ul style="list-style-type: none"> <li>Since Syngenta no longer need the land for crop trials it would be reasonable to deduce that the work can be continued either at Jealott's Hill or elsewhere. Laboratories can be built in any location. Comments range from their needs could be met elsewhere in the borough/the region/the county/the world.</li> <li>If Syngenta is now moving away from land-based testing to more laboratory testing then the company needs to invest in a new facility in a designated Science Park, or to an existing business area around Bracknell with better transport links.</li> <li>There is a reducing demand for offices with agile/flexible working. There is already 1,000,000 sq ft of empty office space and unlet industrial space in the borough to provide for a Science Park. Some have been available to let for many years; demand likely to reduce further in the future.</li> <li>Should be located in defined employment area close to motorway network and amenities.</li> <li>Reading Science Park is a much more attractive location for industry – co-located with Reading University, good public transport links.</li> <li>Syngenta may decide the Oxford/Cambridge corridor is better suited to their needs once monetised the Green Belt.</li> <li>If Syngenta is seeking to create jobs, they should move somewhere in the UK more in need of jobs.</li> <li>Syngenta could do their research anywhere in the world without harming Green Belt.</li> </ul>

<p>070 Richards, 079 Richards, 082 Jenkins, 148 Graver, 251 Kennelly, 300 Redman, 322 Bonfante, 324 Hooker, 388 Taylor, 393 Kedward, 402 Glover, 769 Cole, 794 Jones, 807 Jones, 809 Jones, 831 Phillips, 838 Belie, 840 Ratcliffe, 841 Wallen, 902 Wallen, 925 Cope,</p>	<p>Comments relating to the merging of settlements:</p> <ul style="list-style-type: none"> <li>• Area of Green Belt/countryside between Holyport and Bracknell is beautiful and should be protected as a boundary between outskirts of Maidenhead and the start of Bracknell. This area has already been compromised by developments (gives various areas).</li> <li>• BFC would be handing responsibility for maintaining separation to RBWM as BFC would no longer control sufficient Green Belt to the North to guarantee a sufficient gap.</li> <li>• Development would encourage urban sprawl to join Syngenta to Bracknell. Scotland's Farm and Home have already tried – will be easier to allow these to meet future targets.</li> <li>• Would need a Green Wedge defined between the new 'village' and the defined settlement boundary further south.</li> <li>• A green wedge will be required in the area north of A3095 around Scotland's Farm up to Moss End and east behind Warfield Street. This would be a protective buffer to prevent further development north of Forest Road into the rural areas of Warfield.</li> <li>• Concerned whole area between London to Reading, Maidenhead and beyond will be covered in concrete eventually.</li> <li>• Proposal will create urban sprawl from Reading to Maidenhead and then to Slough/Windsor.</li> <li>• Binfield will merge with Bracknell and Wokingham/it has already merged.</li> <li>• The development will as good as merge Bracknell, Warfield, and Hawthorn Hill.</li> <li>• Bracknell, Binfield, Crowthorne and Wokingham have already effectively merged.</li> <li>• There isn't really a gap between Bracknell and Wokingham anymore.</li> </ul> <p><i>[Refer also to landscape and character section, and Green Belt section. This is also one of the five purposes of the Green Belt]</i></p>
<p><b>HOUSING</b></p>	
<p>208 Earl, 525 Seville, 577 Mullier</p>	<p>Support the proposed housing/community development, including:</p> <ul style="list-style-type: none"> <li>• It's an opportunity to build a community based via economic and social development.</li> <li>• Co-location of housing would assist in attracting the talent needed to exploit the potential provided by an expanded science related site through providing high quality modern sustainable development into an area with limited availability and typically high cost housing.</li> <li>• Locality of modern sustainable housing would support a greener approach to lifestyle of those attracted to the site.</li> <li>• The proposed modern, affordable and more sustainable housing with improved carbon emissions credentials will benefit the Bracknell area.</li> </ul>
<p>001 Moore, 021 Leach, 067 Fernandez, 073 Stroud, 081 Keys, 085 Cope, 091 Rimmer, 101 Bowler, 110 Norman, 111 Norman, 121 Cox, 124 Kingston, 133 Clarkson, 139 Fitzwilliams, 149 Elmes, 151 Kingston, 167 Kingston, 169 Robinson, 174 Kingston, 175 Bown, 176 Stok, 177 Gates, 178 Stok, 188 Ehinger, 189 Auster, 190 Elmes, 193 Sauven, 198 Fall, 201 Deplodge, 210 Woodbridge, 212 Gates, 215 Fall, 216 Proddrow, 217 Mackenzie Dodds, 226 Kennedy, 227 Kennedy, 228 Manoukian, 232 Mackenzie Dodds, 244 Gates, 251 Kennelly, 258 Poole &amp; Banbridge, 265 Mackenzie, 267 Smith, 273 Waddington &amp; Waddington, 275 Painter, 276 Street &amp; Street, 287 White, 294 Thorin, 301 Greenwood, 307 Brunander, 322 Bonfante, 324 Hooker, 325 Bainborough, 328 Manning, 348 Sauven, 349 Hirst, 374 Oakley Green &amp; Fifield Residents Association, 375 Stock &amp; Stock, 380 Barlow, 382 Carter, 385 Cruz-Rimmer, 386 Rimmer, 388 W Taylor, 389 Popplewell, 390 Harries, 391 Mackenzie, 393 Kedward, 404 Hurtado, 441 Lawrence, 461 Knox-Johnston, 465 and 466 Warfield Environmental Group, 470 Warner, 484 S Collings, 582 Bell, 608 M Collings, 620 S Peacey, 637 Nixon, 650 Sparkes, 684 Sparkes, 767 Young, 769 Cole, 794 Jones, 798 Bridges, 802 Bhandal, 803 Squires, 806 Mcalister, 807 Jones, 809 Jones, 810 Plumb, 814 Mcalister, 828 Strange, 829 Mcalister, 831 Phillips, 832 Manoukian, 833 Mcalister, 835 Taylor, 836 Ehinger, 839 Griffiths, 840 Ratcliffe, 841 Wallen, 870 Bridges, 874 Boorman, 902 Wallen, 923 de Roy, 925 Cope, 928 Blakemore, 934 Kedwards, 936 Lloyd, 937 Silverston, 942 Barron</p>	<p>Site should not be allocated as it goes above the Borough's housing need, including:</p> <ul style="list-style-type: none"> <li>• Borough is comfortably within its 5-year supply target.</li> <li>• Housing need met within other sites proposed for allocation.</li> <li>• 4,000 dwellings is 230% over what is needed.</li> <li>• Unnecessary increase by c40% relative to government target.</li> <li>• Though it is estimated only 1,200 homes will be completed by 2036, there is little to stop the 4,000 being progressed whether needed or not.</li> <li>• The acceptance of another 4000 houses sounds like a front for some other, non-associated, benefit to BFC.</li> </ul>



021 Leach, 148 Graver, 273 Waddington & Waddington, 927 Fitzell	<p>More strategic comments regarding housing need/excess of development, including:</p> <ul style="list-style-type: none"> <li>• Would be better to encourage people to live in less densely populated areas of the UK. Many parts of the UK and even the SE are less urbanised.</li> <li>• Population growth may have decreased by 2036 due to realisation of impact of climate change impact.</li> <li>• The political force for new housing without reliance on recent reviews or continued detailed analysis of real and actual needs has led to a situation where thousands of newbuild homes remain unsold.</li> <li>• Why does Bracknell have to expand to this degree?</li> </ul>
002 & 322 Bonfante, 045 Holmes, 053 MacDondaid, 062 Smith, 063 Silvester, 071 Nicholls, 081 Keys; 082 Jenkins; 087 Beardsmore-Gray, 119 Vassor, 131 Hazell, 148 Graver, 156 Hill, 164 Midson, 165 Gooder, 235 Bickley, 236 Bright, 257 Rodgers, 258 Poole & Banbridge, 267 Smith, 282 Gunn, 302 Dove, 305 Shrimpton, 387 Freeman, 400 Mulroy, 402 Glover, 462 Richmond, 463 Harris, 469 Bottwood, 581 Tavermer, 586 Fazey-Gunn, 799 Saadetian, 808 Manoukian, 815 Barlow, 816 Gurney, 832 Manoukian, 839 Griffiths, 884 Manoukian, 934 Kedwards	<p>Overdevelopment/generally too much housing development in area/surrounding areas, including:</p> <ul style="list-style-type: none"> <li>• Excessive development in northern parishes over a short timescale (Whitegrove Estate, Quelm Park, Blue Mountain, Woodhurst Park).</li> <li>• Warfield takes unfair share of development within Bracknell Forest when compared to other northern parishes (refer to Woodhurst Park).</li> <li>• Adverse impact of current developments.</li> <li>• Saturation point where potential benefits of new development do not outweigh the impact and volume of change needs to stop or pause to allow impact of ongoing development to be assessed before further development.</li> <li>• Houses are not selling.</li> </ul> <p><i>[Refer also to related comments regarding quality of life/rural feel/infrastructure points.]</i></p>
002 Bonfante, 065 Sparkes, 148 Graver, 213 Makins, 216 Proddrow, 254 Mauler, 256 Manning, 261 Scutt	<p>Oversupply of housing. Including:</p> <ul style="list-style-type: none"> <li>• Queries whether housing at Jennett's Park and Woodhurst Park is sold/occupied.</li> <li>• Other housing in northern parishes is more than capable of meeting the expansion needs of Syngenta</li> <li>• What is the need for additional housing?</li> <li>• Should consider unoccupied homes, including new build homes and second homes.</li> <li>• Land would be a large building site for years (gives Land at Warfield as example of developments slowing due to over-supply) – would cause blight.</li> </ul>
387 Freeman	<p>House prices will fall in Warfield as there will be no demand. Properties in Bracknell Forest with land may be much less desirable and rural house prices may fall given decline in numbers of horse owners.</p>
244 Gates, 301 Greenwood, 314 Chambers, 325 Bainborough, 367 Sheikh, 385 Cruz-Rimmer, 386 Rimmer, 388 W Taylor, 389 Popplewell, 390 Harries, 582 Bell, 798 Bridges, 802 Bhandal, 803 Squires, 806 Mcalister, 808 Manoukian, 814 Mcalister, 832 Manoukian, 835 Taylor, 870 Bridges, 884 Manoukian, 923 de Roy, 937 Silverston, 988 Bonfante	<p>Alternative site options, including:</p> <ul style="list-style-type: none"> <li>• Around 65% of the Borough is not Green Belt land - ample alternative sites which are better served by transport links.</li> <li>• SHELAA identifies many sites that would have much, much less impact on our green areas.</li> </ul>
021 Leach, 119 Vassor, 154 Willatts, 402 Glover, 581 Tavermer, 649 Clark, 745 Sandhu, 747 Sandhu, 767 Young, 831 Phillips, 840 Ratcliffe, 841 Wallen, 902 Wallen, 927 Fitzell, 928 Blakemore,	<p>Too much development on the site, including:</p> <ul style="list-style-type: none"> <li>• Why build over vast area.</li> <li>• 4,000 homes is unrealistic.</li> <li>• Nature and scale of proposals are overbearing.</li> <li>• 4,000 homes is a small townful.</li> <li>• Why are the council using the land owner's figures and not applying the housing density recommended in the Housing Background Paper – would result in 3,505 homes rather than 4000.</li> <li>• Too many homes being crammed in - small gardens; unattractive; less light in homes; privacy compromised; car parking unworkable causing tensions. Woodhurst Park given as example.</li> <li>• Only around 25% of the site to remain as green space.</li> <li>• Effectively creating an extended city of Bracknell by stealth.</li> <li>• Site does not fit with paragraph 6.28 in terms of suitable housing densities.</li> <li>• Densities do not accord with the rural nature of the area.</li> </ul>
831 Phillips	<p>Housing delivery of only 80-100 homes per year is a mere trickle. Long term impact on access roads. Insufficient to ensure infrastructure will be delivered alongside.</p>
130 Hawkes	<p>Housing incompatible with Science Park. The conflation of proposals for a science park with a planning application for a large housing estate is incongruous. Estate agents rarely feature views over chemistry labs, boiler houses and waste disposal facilities.</p>
831 Phillips	<p>Approval of this site will inevitably lead to even more demand for housing as the population base increases.</p>
841 Wallen, 902 Wallen	<p>If it is to go ahead, some sheltered housing should be provided for those with special needs plus housing for older people so that occupants can use of the Landshare for health and wellbeing without the need to travel</p>
021 Leach	<p>Whilst they are space-saving, 3 storey family homes inappropriate – unattractive and not safe for families (too many stairs; can't watch young children).</p>
253 Jerome	<p>Housing should be for Bracknell people only.</p>
441 Lawrence	<p>I have an uncomfortable sense that Syngenta will retain some control over the management or maintenance of the housing on its land. If there is any such tenure, this will be an indication that BFC is abrogating its responsibility towards its citizens, who will be governed by Syngenta, not BFC.</p>

322 Bonfante, 794 Jones, 798 Bridges	No need for housing for employees: <ul style="list-style-type: none"> <li>No evidence that current employees live in the same Borough, and there is no evidence current employees would wish to live and work at the same place.</li> <li>Site is easily commutable from Bracknell and Maidenhead.</li> <li>Employees will likely continue to commute from countryside.</li> <li>Too remote for young scientists Syngenta hope to attract</li> </ul>
794 Jones	Younger generations are developer's target market, yet can't think of anything worse than being in a cramped, congested, polluted, built-up housing estate. Would not be a good place to raise a family.
<b>Affordable housing</b>	
208 Earl, 401 Donaldson, 525 Seville, 788 Blackburn,	Support provision of affordable homes, including: <ul style="list-style-type: none"> <li>Affordable homes will benefit the Bracknell area.</li> <li>Many professionals struggling to get onto the property ladder; being able to do so in a stunning location with facilities and employment in walking distance is remarkable.</li> </ul>
022 Hunter	Sceptical of the proposed affordable housing provision – unlikely to be achieved (example – Woodhurst).
113 Monks	The site is not in a sensible location for affordable housing provision given the lack of good public transport links and lack of a range of employment opportunities in the vicinity.
267 Smith	Even if a smaller scale development is allowed on site the emphasis should be on starter homes, not vaguer affordable homes, and these should be erected first to avoid back sliding by developers. This would help meet government pledges and there is a great call for this in this area; for young people opposed to large homes for people from outside the area.
053 MacDondald	Far too many 'help to buy' homes proposed.
402 Glover	What is the definition of 'affordable home'? Are the remaining 3000 'unaffordable'?
470 Warner, 794 Jones, 807 Jones, 809 Jones, 934 Kedwards,	Concerns over affordability of affordable homes, including: <ul style="list-style-type: none"> <li>Many new houses in Bracknell/Wokingham, none or very few are 'affordable' to the majority of our youngsters.</li> <li>Have not seen any of the newbuild properties that my child could afford to purchase on a young adult's wage – affordable housing is over promoted.</li> <li>With a x9 differential between average house price/average wage, the affordable homes will open up opportunities for housing associations and private buy to let.</li> <li>1400 affordable homes probably mean very little for existing local residents wanting to buy at a discount, and is patronising to younger generations who still cannot afford it (Cabbage Hill an example).</li> <li>35% affordable housing is being used to sweeten the deal – a great strap line. Shouldn't be advertised as 'affordable'.</li> </ul>
942 Barron	Other identified sites would provide more affordable homes.
<b>ECONOMIC DEVELOPMENT</b>	
047 Holland, 097 Hughes, 208 Earl, 290 Miller, 401 Donaldson, 525 Seville, 577 Mullier, 831 Phillips,	Support proposals for business expansion/Science Park, including: <ul style="list-style-type: none"> <li>Proposals would support UK government's industrial strategy and clean growth agenda.</li> <li>Bracknell Forest cannot afford to lose Syngenta – see project example in Leeds.</li> <li>Council needs to consider how to encourage other companies on board.</li> <li>Syngenta's work is nationally and internationally important for the production of food and agricultural innovation, the technical functions of the site are unique within Syngenta and UK; and are critical to the success of business.</li> <li>Approaching its 100<sup>th</sup> year in existence, the facilities, buildings and infrastructure should be brought to a standard matching world-class expertise and abilities of the workforce. This will require significant investment; Syngenta will make such an investment if plans are successful.</li> <li>The link between the diversity of personnel and high productivity in innovation is clear; in order to sustain this and bring in new talent investment is required to compete in an ever more competitive global market for talent.</li> <li>Evidence exists that innovation happens more quickly and more dramatically at the interfaces between disciplines and between organisations. Creating a location in the area which deliberately generates such interfaces will result in an innovation ecosystem that will create substantial business value, new highly skilled and well paid jobs, and enhance the reputation of Bracknell as a centre for innovation and investment.</li> <li>Unique opportunity offered by proposals for scientific advancements, increased professional connectivity and a world-class scientific centre.</li> <li>Excited by the prospect of having a Science and Innovation Park with global connections locally. The potential to attract professionals with a wide range of scientific disciplines would be a huge benefit to the local area.</li> <li>Increased connection to academia to support companies.</li> <li>Educational opportunities for residents.</li> <li>Further opportunity to train and recruit scientists at the site.</li> <li>Working at Syngenta carries numerous benefits for current, and future employees.</li> <li>Increase in jobs, high quality/skilled jobs (up to 2,000).</li> </ul>
798 Bridges, 806 Mcalister, 811 Bridges, 812 Bridges, 814 Mcalister, 828 Strange, 829 Mcalister, 833 Mcalister, 870 Bridges, 942 Barron	Contravenes Local Plan policies for Employment Areas, paras 4.16-4.18.
769 Cole	Other areas of Bracknell Forest can meet employment need (e.g. TRRL in Crowthorne & industrial areas of Bracknell Town); development is not necessary.
794 Jones, 807 Jones, 809 Jones,	BFC have actively encouraged conversion of commercial space to residential; yet is now changing its tune 180 degrees to support this development; at odds with its behaviour to date. Where is BFC's long term strategy on commercial development?

<p>002 Bonfante &amp; 322 Bonfante, 021 Leach, 057 Maidens Green Society, 062 Smith, 064 Sparkes, 067 Fernandez, 072 Robinson, 081 Keys, 085 Cope, 088 Jones, 095 Young, 120 Sparkes, 121 Cox, 122 Cox, 127 Duncan, 128 Norton, 130 Hawkes, 139 Fitzwilliams, 140 Tillette de Clermont-Tonnerre, 146 Bell, 148 Graver, 162 Midson, 165 Gooder, 167 Kingston, 169 Robinson, 172 Ramsdale, 174 Kingston, 175 Bown, 176 Stok, 177 Gates, 178 Stok, 189 Auster, 190 Elmes, 191 CPRE, 193 Sauven, 198 Fall, 201 Deplodge, 215 Fall, 226 Kennedy, 227 Kennedy, 228 Manoukian, 232 Mackenzie Dodds, 239 Hoare, 244 Gates, 250 Barnett, 254 Mauler, 257 Rodgers, 258 Poole &amp; Banbridge, 261 Scutt, 265 Mackenzie, 267 Smith, 273 Waddington &amp; Waddington, 275 Painter, 276 Street &amp; Street, 287 White, 291/294 Thorin, 301 Greenwood, 303 May, 314 Chambers, 315 King, 323 Lumley, 324 Hooker, 331 Lumley, 349 Hirst, 367 Sheikh, 375 Stock &amp; Stock, 385 Cruz-Rimmer, 380 Barlow, 386 Rimmer, 388 W Taylor, 389 Popplewell, 390 Harries, 393 Kedward, 400 Mulroy, 402 Glover, 408 Robertson, 436 Ketley, 440 Prendergast, 441 Lawrence, 465 Warfield Environmental Group, 485 and 486 S Collings, 508 Cager, 582 Bell, 585 Martin, 636 A &amp; B Brant, 633 Bridges, 608 M Collings, 418 Murphy, 441 Lawrence, 446 Brant, 637 Nixon, 638 De Roy, 650 Sparkes, 652 Hosken, 745 Sandhu, 747 Sandhu, 767 Young, 768 Seaman, 769 Cole, 794 Jones, 798 Bridges, 799 Saadatian, 802 Bhandal, 803 Squires, 806 Mcalister, 807 Jones, 808 Manoukian, 809 Jones, 814 Mcalister, 815 Barlow, 816 Gurney, 828 Strange, 829 Mcalister, 831 Phillips, 832 Manoukian, 833 Mcalister, 835 Taylor, 839 Griffiths, 840 Ratcliffe, 841 Wallen, 870 Bridges, 876 Blakemore, 884 Manoukian, 902 Wallen, 923 de Roy, 925 Cope, 927 Fitzell, 928 Blakemore, 934 Kedwards, 937 Silverston, 988 Bonfante</p>	<p>Lack of evidence to justify exceptional circumstances relating to economic matters, including:</p> <ul style="list-style-type: none"> <li>• Comments relating to Syngenta's finances/ability to self-fund development: <ul style="list-style-type: none"> <li>○ Syngenta is a highly profitable global company - able to fund their own research and plans to adapt/expand without selling land/enabling development.</li> <li>○ Syngenta is not a charitable foundation; NGO; nor is it a local Warfield enterprise that requires the effort and understanding of local residents for its survival. Far from it.</li> <li>○ ChemChina (Chinese government owned Agri Tech group) acquired Syngenta in June 2017 for US\$43Bn therefore the survival of the research site cannot possibly depend on investments funded by this proposed development.</li> <li>○ Syngenta made over \$1Bn within EMEA (2018 report) and £3.9Bn globally.</li> <li>○ Review of Syngenta's most recent financial filings indicate an uncertain financial future and a declining operating income.</li> <li>○ Development appears to be commercially driven to suit investment requirements of multi-national company.</li> <li>○ Proposal is a money-making exercise for Syngenta/why does a company of such value need financial support? Syngenta want to fund their new science park and make vast profits in the process.</li> <li>○ Syngenta are applying for an Initial Public Offering within the next two years which no doubt Jealott's Hill will form part of their assets which will increase dramatically in value, enhancing their share price if planning is granted.</li> <li>○ If development of the site is so essential to sustain the site, what will happen in the next eight years before housing development starts?</li> </ul> </li> <li>• Comments relating to the economic significance of Syngenta to Bracknell Forest borough: <ul style="list-style-type: none"> <li>○ No specific reference from BFC that the 'national or international significance' of Syngenta's site is specifically financially important to Bracknell Forest output.</li> <li>○ The c.800 jobs at Syngenta Jealott's Hill represent only c.1% of the total jobs in BFC. This is in no way significant enough to 'warrant exceptional circumstances'. BFC benefits from very low unemployment at 2.5%. This is c.1/3rd less than the national average. There is no general economic need to justify the proposal.</li> <li>○ <i>[Reference should also be made to comments below regarding employment.]</i></li> </ul> </li> <li>• Comments relating to the exceptional circumstances/the business case: <ul style="list-style-type: none"> <li>○ Insufficient information provided to validate that enabling development of 400 houses is required to expand its business; or that Syngenta needs a financial boost.</li> <li>○ How much do Syngenta need to invest in the site to make it sustainable or what time period this will need to cover?</li> <li>○ Where is the business plan and company accounts that clearly indicate the 'enabling development' is required?</li> <li>○ Any requirement for built facilities to meet Syngenta's needs is not a valid justification for major private company generating funds through inappropriate development in the Green Belt.</li> <li>○ Maximising financial return does not provide exceptional circumstances.</li> <li>○ Research proposals are not exceptional.</li> </ul> </li> <li>• Comments relating to the potential for the business to leave the site: <ul style="list-style-type: none"> <li>○ Syngenta have no intention to provide the research centre.</li> <li>○ Question the validity of the Council having the power to 'secure the future' of this business.</li> <li>○ Business could leave at any time regardless of housing/expansion, taking the land sale profits with them.</li> <li>○ Companies will operate where it is economically viable to trade for their business. They will not stay long term based on an argument developing land will support the economic viability of their business. These are entirely different decisions.</li> <li>○ Questionable as to the time frame that ChemChina will retain ownership. The site has had three or more owners since acquired by ICI in 1927. If Chemchina were to sell it on as a result of planning permission being withheld it is likely that another organisation will acquire it and life will still continue.</li> </ul> </li> <li>• Comments regarding the profits from development: <ul style="list-style-type: none"> <li>○ None of the money raised through proposals will remain in England/it will go to China. How is the development therefore really beneficial to the local community or the UK as a whole?</li> <li>○ Syngenta is a wholly owned subsidiary of Chemchina which is itself wholly owned and directed by the Peoples Republic of China. There are a number of Syngenta sites within the UK and all are currently under pressure to repatriate cash to China in order to pay off the original purchase price. The agricultural land which came with the Jealott's Hill site is peripheral to the modern scientific plant research and is therefore a prime asset to be offloaded at its maximum value.</li> </ul> </li> <li>• Comments regarding other potential funding sources: <ul style="list-style-type: none"> <li>○ Since this operation is so important, it should be funded by Central Government, if insufficient funding is available from agriculture/related industries.</li> <li>○ If there is a public interest in assisting this company with its finances it is surely the responsibility of Central Government, who will need to have regard to the law relating to subsidies to companies.</li> </ul> </li> <li>• Broader comments relating to Syngenta and its operations: <ul style="list-style-type: none"> <li>○ The business' past decisions have purely been made based on profitability.</li> <li>○ Contrary to claims, field trials have not taken place at the site during the past 16 years.</li> <li>○ The original British owner of the site, ICI, successfully improved their experimental facilities without sacrificing Green Belt land and maintained a good relationship with their neighbours.</li> <li>○ This site is already Syngenta's largest globally, and already houses a number of centres of scientific excellence.</li> <li>○ Syngenta and the companies within its group have 100 sites worldwide – reducing the importance of this site.</li> <li>○ Maybe Syngenta will move into property development following land value increase?</li> <li>○ Where are the commitments for direct job creation by Syngenta or indeed job retention?</li> <li>○ If Syngenta was of such renown wouldn't schools/businesses visit it/promote it to their students?</li> <li>○ Syngenta already have outreach programs with schools.</li> <li>○ Syngenta already actively work with the community through Landshare and charities.</li> </ul> </li> <li>• Comments relating to the planning process and Local Plan wording relevant to this topic: <ul style="list-style-type: none"> <li>○ Object/strongly object to prejudicial para 6.48 'The future operation of the site is dependent on significant investment being made which will require enabling development to help fund it.'</li> <li>○ Not appropriate to use public benefit (Green Belt) or public subsidy to fund enabling development.</li> <li>○ Commercial and financial benefits should not influence planning decisions.</li> <li>○ Significant risk of corruption exists at all levels within the Borough through external interests.</li> </ul> </li> <li>• Proposal is based on short term grounds.</li> </ul>
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	<p>Many respondents referred specifically that the Green Belt should not be released for financial reasons. <i>[Reference should also be made to the associated comment relating to exceptional circumstances under Green Belt below.]</i></p>
<p>244 Gates, 301 Greenwood, 228 Manoukian, 367 Sheikh, 385 Cruz-Rimmer, 388 Taylor, 389 Popplewell, 390 Harries, 484 S Collings, 582 Bell, 633 Bridges, 798 Bridges, 802 Bhandal, 803 Squires, 806 Mcalister, 808 Manoukian, 814 Mcalister, 815 Barlow, 828 Strange, 829 Mcalister, 832 Manoukian, 833 Mcalister, 835 Taylor, 841 Wallen, 870 Bridges, 884 Manoukian, 902 Wallen, 923 de Roy, 937 Silverston, 942 Barron</p>	<p>Syngenta AG's CEO commented on the 22nd Oct 2019 to Bloomberg that the company is preparing for an IPO (Initial Public Offering) (stock market listing) and expects this to be within the next 2.5 years. Expected to raise many billions of \$ (source: Bloomberg 15<sup>th</sup> August 2019).</p>
<p>022 Hunter, 068 Boyd, 076 Rothwell-Boyd, 122 Cox, 148 Graver, 167 Kingston, 174 Kingston, 192 Parkinson, 193 Sauven, 196 Mead, 197 Parkinson, 198 Fall, 201 Depodge, 232 Mackenzie Dodds, 273 Waddington &amp; Waddington, 288 Thorin, 323 Lumley, 331 Lumley, 466 Warfield Environmental Group, 484 S Collings, 633 Bridges, 608 M Collings, 794 Jones, 798 Bridges, 841 Wallen, 902 Wallen, 942 Barron</p>	<p>What guarantees are there that Syngenta will maintain a presence on the site? Including:</p> <ul style="list-style-type: none"> <li>• Likely to dispose of site to Taylor Wimpey and leave the area with massive profit.</li> <li>• Likely to move from site given planned merger between ChemChina and SinoChem which often result in stripping of assets.</li> <li>• Syngenta office in Switzerland has already been stripped out and sold.</li> <li>• Likely to sell site given need to reduce burden of purchase of Syngenta.</li> </ul> <p>What will happen if Syngenta withdraw from the site? Including:</p> <ul style="list-style-type: none"> <li>• There are no plans from the Council if Syngenta withdraw from the site/no demonstration of alternatives.</li> <li>• Would housing be allowed on vacant employment areas if Syngenta leaves? Risk of becoming dormitory village.</li> <li>• Would other employers remain if Syngenta leaves?</li> <li>• Would housing be allowed on vacant employment areas?</li> <li>• May become a remote dormitory village with few local employment opportunities.</li> </ul>
<p>021 Leach, 064 Sparkes, 085 Cope, 130 Hawkes, 323 Lumley, 331 Lumley, 484 S Collings, 767 Young, 841 Wallen, 902 Wallen, 925 Cope,</p>	<p>Expansion of existing business/development of Science Park, including:</p> <ul style="list-style-type: none"> <li>• No evidence provided to suggest a Science Park is needed to encourage other companies to locate there; or for these companies, schools and universities to collaborate more effectively with Syngenta.</li> <li>• No evidence that other companies want to relocate to this site. Evidence needs to be provided that other companies have expressed an interest in moving to an expanded research site.</li> <li>• No evidence provided that a Science Park couldn't be achieved using existing office space in the borough.</li> <li>• With improved communications, there is less need for a close physical relationship to ensure collaborative working with companies involved in associated technologies.</li> <li>• Question why, if Syngenta's business is dependent on the development of a 'science park' to support a key part of their business - synergising their various technologies and expertise with start-ups, university spin offs etc - they haven't already invited such companies and universities to share their site in investment and in the application? They may have done, but surely this should be made apparent, if so, to make a better case for an organically growing global centre?</li> <li>• No indicators of what research Syngenta want to extend into.</li> <li>• What evidence supports the requirement for 1.32million sqm of additional commercial space so soon after the new £8million science block was opened?</li> <li>• May not prove to be an attractive and sustainable site for companies to operate from.</li> <li>• Syngenta will not be able to rely on 'specialist' local businesses, as given the site is in the Green Belt there are no businesses.</li> </ul>

124 Kingston, 127 Duncan, 148 Graver, 151 Kingston, 187 Collinson, 633 Bridges, 232 Mackenzie Dodds, 265 Mackenzie, 276 Street & Street, 291 Thorin, , 315 King, 323 Lumley, 331 Lumley, 388 Taylor, 436 Ketley, 441 Lawrence, 585 Martin, 633 Bridges, 684 Sprakes, 748 British Horse Society, 767 Young, 794 Jones, 796 Bartlett, 806 Mcalister, 807 Jones, 808 Manoukian, 809 Jones, 814 Mcalister, 828 Strange, 829 Mcalister, 832 Manoukian, 833 Mcalister, 839 Griffiths, 841 Wallen, 870 Bridges, 884 Manoukian, 902 Wallen, 927 Fitzell, 928 Blakemore, 942 Barron	<p>Employment, including:</p> <ul style="list-style-type: none"> <li>• No need for the jobs claiming to be created: <ul style="list-style-type: none"> <li>○ The c.800 jobs at Syngenta Jealott's Hill is c.1% of total jobs in BFC – neither significant nor exceptional. Many employees will be from outside of BF.</li> <li>○ Proposal is not required as unemployment in the Borough is c. 2.5%, well below national average. Many unfilled jobs locally.</li> </ul> </li> <li>• Potential loss of employment should the development not go ahead: <ul style="list-style-type: none"> <li>○ Barely veiled threat to remove the employment should planning permission not be given.</li> <li>○ What threat is envisaged to jobs at Syngenta if the Council does not agree to the proposed development at this site?</li> <li>○ Realise that jobs may be put at risk if this does not go ahead, but the scale of this development far outweighs the benefits.</li> </ul> </li> <li>• Benefit of employment to Bracknell Forest borough: <ul style="list-style-type: none"> <li>○ No assessment by the Council of the number/type of jobs created as a direct result; if they will be filled by people LIVING on the development; nor assessment of genuine wealth creation within the Borough (including comments to establish an offset benefit against damage to the Green Belt).</li> <li>○ No guarantee that income from employment will remain in the borough or that employees will live on site.</li> <li>○ Not clear how many jobs will actually benefit BFC residents.</li> </ul> </li> <li>• Employment by Syngenta: <ul style="list-style-type: none"> <li>○ No commitment from Syngenta to create or retain jobs.</li> <li>○ Not clear how many jobs will be retained by Syngenta given the area they occupy is to reduce.</li> <li>○ Job proposals are irrelevant as no company can guarantee future/current jobs.</li> </ul> </li> <li>• Specialist nature of employment / location of employees: <ul style="list-style-type: none"> <li>○ Significant proportion of employees travel long distances to the site from outside the area - will increase with more jobs.</li> <li>○ Specialist employees needed therefore likely to employ from outside the area and commute long distances to work.</li> <li>○ Not clear if the skills needed by Syngenta exist in BF or need to be attracted to the borough by the housing.</li> <li>○ Likely that a significant proportion of the circa 5,000 economically active residents will not be employed on site and will still commute out. Nothing to make them work on site. Others will commute in.</li> <li>○ The remote location will not attract young scientists.</li> </ul> </li> <li>• Other employment for residents of the development: <ul style="list-style-type: none"> <li>○ Proposal will create 900 jobs yet expand the population by 12,000. Will there really be work for all these people? Where are they coming from?</li> <li>○ Where will people find work, i.e. doctors, nurses and dentists?</li> <li>○ Employment will only be needed to satisfy the incoming population.</li> </ul> </li> <li>• No guarantee that new jobs will be created immediately after the first phase of development complete.</li> <li>• New development will suffer brain drain and competitive pressure from larger employment market in Bracknell Town.</li> <li>• Failure to consider loss of employment opportunities provided by rural activities such as equestrian uses (tack shops, farriers, equine dentists/physiotherapists etc).</li> </ul>
767 Young	This proposed development does nothing to support the continued regeneration of Bracknell and may indeed be a threat to it in that it does little to address the vacant office space issue today and may act as a counter attraction and brain drain in the future.
128 Norton	Syngenta, now a Chinese state-owned company, no doubt has a high level of security/privacy. If the plan is agreed, will there be an opportunity to see what kind of work is being carried out there?
128 Norton, 176 Stok, 178 Stok, 273 Waddington & Waddington, 276 Street & Street, 807 Jones, 809 Jones	<p>Issues relating to increase in land value/windfall profit, including:</p> <ul style="list-style-type: none"> <li>• Who owns the land?</li> <li>• Is the legal entity who owns the land and will see vast increase in land value based in UK? Will they pay appropriate tax on the profit?</li> <li>• Given the sacrifice of Green Belt will the Council ensure Syngenta do spend the considerable uplift in the value of the Jealott's Hill estate on improving the scientific facilities?</li> <li>• By changing the status of this land from Green Belt to industrial and housing development, BFC could be seen to contravene the EU subsidies policies by ensuring this company which owns all the proposed land is given a windfall profit of over £500,000,000.</li> </ul>
273 Waddington & Waddington	What was the £60million disposal in Syngenta UK Ltd's accounts?
684 Sparkes, 841 Wallen, 902 Wallen	Many horse livery yards and businesses will be dramatically affected. Riders choose to keep their horses here for off road routes. Calculated the number of horses stabled in the area surrounding Jealott's Hill, which use the network of bridleways and off road routes and it is nearly 300 horses (map provided). The British Horse Society (BHS) estimate the cost of keeping one horse was £4,300-£6,100 per annum on a DIY basis. However, a significant number of local horses are kept on part or full livery which costs £7,500-£9,000 pa. If we use the average cost of keeping the horse this is potentially a loss of revenue for the area of plus £1,905,000 per annum. There are also two tack shop/feed merchants, a large veterinary practice and numerous farriers and other associated businesses located here which rely on the horse population in the area.
<b>INFRASTRUCTURE</b>	
<b>Services, facilities</b>	
525 Seville	The proposed new schools, commercial buildings, accommodation, and sports and leisure facilities will be tangible benefits for the Bracknell area.
401 Donaldson	Great opportunity to emphasise STEM subjects to children and young adults in such a community.
841 Wallen, 902 Wallen	Contravenes LP12 Infrastructure.
841 Wallen, 902 Wallen	Contravenes LP14 Standards for open space of public value (refers to Table 4, point B4).
841 Wallen, 902 Wallen	Viability assessment needs to be undertaken before any conclusion is reached regarding sustainability.

045 Holmes, 046 Gale, 055 Calcutt, 062 Smith, 063 Silvester, 087 Beardsmore-Gray, 108 Fernandez, 110 Norman, 111 Norman, 119 Vassor, 147 Bowen, 158 Luck, 164 Midson, 166 Grace, 188 Ehinger, 216 Proddow, 221 Sinclair, 267 Smith, 322 Bonfante, 348 Sauven, 378 Prior & Craig, 388 Taylor, 400 Mulroy, 466 Warfield Environmental Group, 484 S Collings, 469 Bottwood, 484 S Collings, 608 M Collings, 650 Sparkes, 799 Saadetian, 836 Ehinger, 839 Griffiths, 927 Fitzell, 934 Kedwards	<p>Already too much pressure on/will put more pressure on infrastructure and services, including:</p> <ul style="list-style-type: none"> <li>• Healthcare (including hospitals, dentists and GPs – no plans for increasing provision – potential to endanger lives).</li> <li>• Schools.</li> <li>• Proposed secondary school unlikely to be used initially, causing further reliance on existing schools and further congestion.</li> <li>• Existing retail – not enough retail to support this type of development.</li> <li>• Water resources.</li> </ul>
332 Dimbleby, 836 Ehinger, 841 Wallen, 902 Wallen	<p>Utilities, including:</p> <ul style="list-style-type: none"> <li>• Concerns regarding water supply, water pressure, drainage/sewage and electric supplies.</li> <li>• No assessment of wastewater.</li> <li>• Area is at serious water stress – therefore not a good idea to build 4000 dwellings above those that are genuinely needed.</li> <li>• Where will the water supply for a development of this scale come from?</li> <li>• Upgrading sewage, installing water etc may destroy ancient hedgerows.</li> </ul>
120 Sparkes, .0177 Gates, 212 Gates, 841 Wallen, 902 Wallen	<p>Over supply of education facilities, including:</p> <ul style="list-style-type: none"> <li>• Not clear why the proposed retail/community hub and secondary school are required given the existing Tesco site and new secondary school (Kings Academy).</li> <li>• Provision of three primary schools and a secondary school is unjustified.</li> <li>• 1,200 homes will yield approx. 420 primary aged children. As the average size of a primary school is 282 pupils 2 primary schools will be needed this plan period. Approximately 300 secondary aged children will live in the 1,200 homes. As the secondary school will not be built during this plan period, there will be many cars travelling to existing secondary schools (such as Kings Academy). SEN provision will also be needed (approx. 120 pupils). Has Kings capacity to accommodate them?</li> </ul>
498 S Collings, 615 M Collings, 841 Wallen, 902 Wallen	<p>Phasing of infrastructure, including:</p> <ul style="list-style-type: none"> <li>• 30% of the homes proposed within the plan period (to 2036), with provision of one primary school suggests there will be no secondary school, local centre providing convenience retailing, healthcare facility, community hub or other community facilities within the plan period. Residents will need to travel elsewhere, on roads which are already congested. Not a sustainable development.</li> <li>• No information provided re timescales of infrastructure.</li> <li>• No community facilities are proposed during this plan period which is not sustainable and adds to car movements.</li> </ul>
841 Wallen, 902 Wallen	<p>Proposed retail floorspace may have an adverse effect on the local centre at Moss End which must be left to continue to thrive.</p>
441 Lawrence, 508 Cager, 798 Bridges, 806 Mcalister, 814 Mcalister, 828 Strange, 829 Mcalister, 833 Mcalister, 870 Bridges	<p>The new facilities on site will serve the new residents of the 4000 houses, including:</p> <ul style="list-style-type: none"> <li>• No benefit to existing community.</li> <li>• Are being used as 'sweeteners', no added value as require for new residents.</li> </ul>
142 Pilcher, 154 Willatts, 155 Vyret, 252 Britt, 807 Jones, 809 Jones, 841 Wallen, 902 Wallen	<p>Support continuation or replacement of the Community Landshare, including:</p> <ul style="list-style-type: none"> <li>• The existing Landshare site does such excellent work for the community.</li> <li>• Currently a showcase, highly successful, lauded.</li> <li>• Relocation will disillusion volunteers.</li> <li>• Various organisations use the site and must not be left without that support.</li> <li>• Benefits people of many different ethnic backgrounds, varied knowledge and physical and mental abilities.</li> <li>• A place of friendship, tranquillity, wide horizons.</li> <li>• Mental and physical health benefit. Leave feeling positive and upbeat.</li> <li>• Facilities include 6 acres, orchard, vineyard, polytunnel (good for bad weather use).</li> <li>• If re-sited, will result in a loss of a substantial mature 450 tree orchard believed to be one of the biggest in Berkshire. The orchard supports 77 varieties of flora. Orchards are mentioned as a priority feature in the Council's Biodiversity Action Plan (Woodland Objective).</li> </ul>
231 Jealott's Hill Community Landshare	<p>c. 1000 visitors per year to the site. Invite to visit the site. List of site community Landshare facilities provided to identify requirements if the site is relocated (including growing areas, other land areas, buildings, land boundary and security, and utilities).</p>
469 Bottwood,	<p>No commitment of financial support to the community from the company/Council to support the local people.</p>
748 British Horse Society	<p>Concerned about the potential loss of youth charities such as the local Pony Club given the decline in horse owners.</p>
<b>Transport</b>	

<p>002 Bonfante &amp; 322 Bonfante, 025 Fernandes, 057 Maidens Green Society, 067 Fernandez, 068 Boyd, 076 Rothwell-Boyd, 124 Kingston, 146 Bell, 151 Kingston, 158 Luck, 176 Stok, 178 Stok, 191 CPRE, 192 Parkinson, 196 Mead, 197 Parkinson, 200 Singleton, 201 Deplodge, 214 Symes, 221 Sinclair, 226 Kennedy, 227 Kennedy, 269 Westbury, 275 Painter, 296 Payne, 303 May, 315 King, 328 Manning, 374 Oakley Green &amp; Fifield Residents Association, 387 Freeman, 388 W Taylor, 417 Murphy, 441 Lawrence, 461 Knox-Johnston, 462 Richmond, 463 Harris, 484 S Collings, 561 McArthur, 608 M Collings, 620 S Peacey, 806 Mcalister, 808 Manoukian, 814 Mcalister, 815 Barlow, 816 Gurney, 828 Strange, 829 Mcalister, 831 Phillips, 832 Manoukian, 833 Mcalister, 840 Ratcliffe, 841 Wallen, 870 Bridges, 876 Blakemore, 884 Manoukian, 902 Wallen, 928 Blakemore, 942 Barron</p>	<p>Unsustainable location for development, including:</p> <ul style="list-style-type: none"> <li>• Contravenes LP13 Transport principles.</li> <li>• Site does not fit with paragraph 6.28 - site is remote from the main transport hubs.</li> <li>• Proposed development would be unsustainable, isolated, remote from existing populated areas.</li> <li>• Mid-way between Bracknell and Maidenhead, in the middle of open countryside.</li> <li>• Site only accessible by car / infrequent buses/ heavily reliant on car-based transport.</li> <li>• Long distance to railway stations/main transport hubs (nearest train stations are at Bracknell, 3 miles away; and Maidenhead, 6 miles away).</li> <li>• Poor rail links into London will lead to new residents driving to get anywhere.</li> <li>• Poorly located to many services and facilities.</li> <li>• No walkable amenities.</li> <li>• The site is served by the A3095 and A330, both of which are country roads without pavements and hostile to cyclists and pedestrians.</li> <li>• Lack of public transport links.</li> <li>• Syngenta and BFC need to recognise the enormous investments required to provide regular bus services and cycle paths to connect site to surrounding major settlements.</li> <li>• Whilst encouraging eco-friendly modes of transport and travel is admirable, this is not the reality for commuting, school runs and general travel for the majority of people.</li> <li>• BFC agrees that it may be impossible to provide sustainable alternatives to cars use for foreseeable future.</li> <li>• How can this be considered a sustainable development to justify loss of Green Belt when there are no joined up infrastructure plans between BFC and adjoining boroughs?</li> <li>• Resultant impact to air quality, climate change and environmental impact.</li> </ul>
<p>132 Beck, 149 Elmes, 841 Wallen, 902 Wallen</p>	<p>Impact to rail infrastructure, including:</p> <ul style="list-style-type: none"> <li>• A portion of new residents will want to access the high-speed train line (road traffic impact).</li> <li>• Parking provision at closest railways stations is poor e.g. Martin's Heron, Bracknell and Maidenhead (Stafferton Way – already full).</li> </ul>
<p>387 Freeman, 925 Fitzell 205 Singleton, 253 Jerome, 558 Sherrington, 841 Wallen, 902 Wallen</p>	<p>Parking in Bracknell town centre will struggle to cope with additional demand.</p> <p>Comments relating to transport by bus, including:</p> <ul style="list-style-type: none"> <li>• As well as improved bus services into Bracknell and Maidenhead, a bus service should be provided direct to Brants Bridge and Heatherwood medical facilities. None currently exists.</li> <li>• Buses need to link the site to the town centre and supermarket.</li> <li>• Services need to be more frequent.</li> <li>• A Bracknell day ticket only extends as far north as the Plough and Harrow – will this be extended to Jealott's Hill?</li> <li>• Improvements could be CIL funded.</li> </ul>



<p>001 Moore, 002 Bonfante &amp; 322 Bonfante, 021 Leach, 022 Hunter, 024 Scott, 025 Fernandes, 030 Holyport Residents Association, 036 Gibson, 039 Ruddle, 045 Holmes, 046 Gale, 047 Holland, 053 MacDonald, 057 Maidens Green Society, 062 Smith, 063 Silvester, 065 Sparkes, 067 Fernandez, 069 Gay, 070 Richards, 071 Nicholls, 073 Stroud, 079 Richards, 081 Keys, 085 Cope, 087 Beardsmore-Gray, 088 Jones, 094 Barlow, 096 Hartley, 101 Bowler, 108 Fernandez, 109 Hayden Kellard, 112 Mitchell, 113 Monks, 119 Vassor, 120 Sparkes, 121 Cox, 122 Cox, 123 Collins, 124 Kingston, 128 Norton, 131 Hazell, 133 Clarkson, 137 Jones, 139 Fitzwilliams, 146 Bell, 147 Bowen, 148 Graver, 149 Elmes, 127 Duncan, 151 Kingston, 154 Willatts, 165 Gooder, 166 Grace, 167 Kingston, 174 Kingston, 169 Robinson, 170 Grace, 172 Ramsdale, 175 Bown, 176 Stok, 177 Gates, 178 Stok, 187 Collinson, 188 Ehinger, 189 Auster, 190 Elmes, 191 CPRE, 193 Sauven, 196 Mead, 198 Fall, 210 Woodbridge, 212 Gates, 213 Makins, 214 Symes, 215 Fall, 216 Proddow, 225 Royall, 232 Mackenzie Dodds, 235 Bickley, 236 Bright, 237 Dunn, 251 Kennelly, 253 Jerome, 254 Mauler, 257 Rodgers, 258 Poole &amp; Banbridge, 260 Sharpe, 261 Scutt, 265 Mackenzie, 267 Smith, 269 Westbury, 273 Waddington &amp; Waddington, 275 Painter, 276 Street &amp; Street, 282 Gunn, 287 White, 290 Miller, 296 Payne, 300 Redman, 303 May, 305 Shrimpton, 307 Brunander, 310 Osada, 323 Lumley, 324 Hooker, 331 Lumley, 332 Dimbleby, 348 Sauven, 349 Hirst, 356 Stearn, 364 Griffiths, 374 Oakley Green &amp; Fifield Residents Association, 375 Stock &amp; Stock, 378 Prior &amp; Craig, 380 Barlow, 382 Carter, 387 Freeman, 388 Taylor, 391 MacKenzie, 393 Kedward, 400 Mulroy, 402 Glover, 403 Browne, 404 Hurtado, 441 Lawrence, 442 Yates, 446 Brant, 461 Knox-Johnston, 462 Richmond, 463 Harris, 465 and 466 Warfield Environmental Group, 469 Bottwood, 484 S Collings, 508 Cager, 558 Sherrington, 561 McArthur, 581 Taverner, 586 Fazey-Gunn, 636 A &amp; B Brant, 633 Bridges, 608 M Collings, 620 S Peacey, 637 Nixon, 638 De Roy, 651 Sabine, 684 Sparkes, 768 Seaman, 769 Cole, 788 Blackburn, 798 Bridges, 794 Jones, 796 Bartlett, 803 Squires, 806 Mcalister, 807 Jones, 808 Manoukian, 809 Jones, 810 Plumb, 814 Mcalister, 815 Barlow, 816 Gurney, 820 Browne, 821 Browne, 828 Strange, 829 Mcalister, 831 Phillips, 832 Manoukian, 833 Mcalister, 836 Ehinger, 838 Belie, 839 Griffiths, 841 Wallen, 869 Doughty, 870 Bridges, 871 Elford, 874 Boorman, 876 Blakemore, 884 Manoukian, 902 Wallen, 925 Cope, 927 Fitzell, 928 Blakemore, 933 Glen, 934 Kedwards, 936 Lloyd, 942 Barron, 962 Stunt, 964 Turner</p>	<p>Impact upon road infrastructure within the borough, including:</p> <ul style="list-style-type: none"> <li>• Roads are already heavily congested/gridlocked and unable to cope with additional movement: <ul style="list-style-type: none"> <li>○ Traffic infrastructure in north of Bracknell Forest borough is a major issue – very poorly served with no high quality, high capacity transport routes.</li> <li>○ New roads for Warfield development are already struggling suggesting Jealott's Hill's situation will be no better.</li> <li>○ Recent developments have increased congestion over last few years (including Cabbage Hill, Binfield, Legoland).</li> <li>○ Cumulative impact of recent/unimplemented developments. No significant upgrades have occurred despite the level of development.</li> <li>○ Level of traffic is generally dangerous.</li> </ul> </li> <li>• Changes to the road infrastructure: <ul style="list-style-type: none"> <li>○ Limited ability to upgrade existing roads, an 'upgrade' will not be enough.</li> <li>○ Significant investment in infrastructure needed.</li> <li>○ No plans from Syngenta to expand the road system/make substantial improvements.</li> <li>○ If it goes ahead, surrounding roads and junctions are suitably improved prior to development commencing.</li> </ul> </li> <li>• Impact to residents and environment as a result of increased traffic and changes to road infrastructure: <ul style="list-style-type: none"> <li>○ quality of life</li> <li>○ air quality/pollution</li> <li>○ noise and vibration</li> <li>○ social impact</li> <li>○ urbanisation of rural roads/loss of countryside</li> <li>○ required improvements to roads/junctions will have impact on rural character, on surrounding properties and settings (e.g. Grade II Cruchfield Manor).</li> </ul> </li> <li>• Issues specific to rural roads: <ul style="list-style-type: none"> <li>○ Country lanes/B roads are not arterial, some are unlit, windy, tree lined and lack footpaths.</li> <li>○ Minor roads are being used as rat runs - will increase - notable damage to verges, road surface integrity and substrate compaction (e.g. Bottle Lane, Ryehurst Lane – as Three Legged Cross junction is already at capacity and Warfield development is not yet fully occupied; road around Warfield Church and Frost-Folly).</li> <li>○ Rural lanes would need upgrading with at least wider roads and pavement – feasible?</li> <li>○ Roads will lose their rural nature.</li> </ul> </li> <li>• Increase in traffic: <ul style="list-style-type: none"> <li>○ Traffic and vehicle movements will inevitably increase - insufficient evidence that existing workers at Syngenta will want to relocate from their existing houses to the proposed "garden settlement". Unlikely that research scientists will wish to live in "affordable housing".</li> <li>○ It is unlikely that Syngenta would support employment for a further 4,000 homes so residents will need to travel to work. Reports indicate only 10% of the employment would be served by people residing in this village.</li> <li>○ Report states by 2049 there will be 4,614 residents in employment. If 10% of those work at Syngenta that is only 461 employees locally sourced. Does not corroborate the claims (in externally commissioned reports) about internalizing the movements.</li> <li>○ BFC estimate only 20% of site residents would work on site – so 80% will commute.</li> <li>○ Inconceivable theory that the 10-12,000 people living here will mainly spend their lives on site. Neither the plan nor the Infrastructure Delivery Plan demonstrate that a large number of journeys will be self-contained. Commuting to/from the site is inevitable.</li> <li>○ Increased traffic will negate any benefit from Crossrail.</li> <li>○ Increased reliance on home deliveries will also increase traffic.</li> </ul> </li> <li>• Traffic impact assessment/survey needed – with input from residents.</li> <li>• Support sustainable modes of travel however questions whether take up will be sufficient to make noticeable improvement</li> <li>• Newell Road – the road and pavements needs widening, with traffic lights at each end.</li> </ul> <p>Specific concerns regarding: A3095 Maidenhead Rd, A330 Ascot Road, Wellers Lane, Osborne Lane, Westhatch Lane, Bishops Lane, Malt Hill Road, Warfield Street, Kingscroft Lane, Cock Lane, Church Road, Binfield Road/Forest Road junction, Three Legged Cross junction, bridge in Binfield, North Street (Winkfield), A322, M4 J6 &amp; 8/9, Forest Road, Ellison and Sopwith roads (narrow), Plough &amp; Harrow lights, Spice Lounge Junction, Ellison Road, Sopwith Road, Newell Road.</p>
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<p>030 Holyport Residents Association, 036 Gibson, 045 Holmes, 090 Halfacre, 092 Pearson, 096 Hartley, 101 Bowler, 110 Norman, 111 Norman, 113 Monks, 132 Beck, 147 Bowen, 166 Grace, 167 Kingston, 170 Grace, 174 Kingston, 176 Stok, 178 Stok, 191 CPRE, 193 Sauven, 198 Fall, 236 Bright, 237 Dunn, 260 Sharpe, 273 Waddington &amp; Waddington, 276 Street &amp; Street, 282 Gunn, 287 White, 290 Miller, 322 Bonfante, 324 Hooker, 346 Proddow, 367 Sheikh, 374 Oakley Green &amp; Fifield Residents Association, 404 Hurtado, 484 S Collings, 558 Sherrington, 560 Turner, 561 McArthur, 636 A &amp; B Brant, 637 Nixon, 745 Sandhu, 747 Sandhu, 794 Jones, 807 Jones, 809 Jones, 815 Barlow, 841 Wallen, 871 Eiford, 902 Wallen, 925 Cope, 934 Kedwards, 964 Turner</p>	<p>Impact upon road infrastructure outside of the borough which needs to be taken into account, including:</p> <ul style="list-style-type: none"> <li>• Unacceptable impact (congestion, pollution, noise, inconvenience) on roads and unacceptable disruption to residents outside of Bracknell Forest.</li> <li>• Extra traffic will also be generated by Crossrail/Elizabeth Line and RBWM's own Local Plan.</li> <li>• Infrastructure is already overloaded.</li> <li>• No road improvements noted to the north of the site.</li> <li>• Associated pollution.</li> <li>• RBWM Local Plan does not address the issue of additional traffic from this site.</li> <li>• Improvements required outside of borough – BFC have no responsibility but intend to impact traffic.</li> <li>• If further development on the Maidenhead side of Bracknell occurs a separate vehicle movement plan is required to determine the impacts on the wider areas or a Holyport bypass is required.</li> <li>• Have any discussions relating to the management of additional traffic been made?</li> <li>• Impact of ongoing development at Woodhurst and other allocations in Bracknell Forest and allocations in neighbouring Boroughs and in particular the Royal Borough of Windsor and Maidenhead (RBWM), and Wokingham Borough Council.</li> </ul> <p>Specific issues raised which need to be taken into account include:</p> <ul style="list-style-type: none"> <li>• A330 Ascot Road in Holyport is gridlocked in rush hour (Braywick roundabout to Holyport Green) – some suggest bypass should be built to resolve this.</li> <li>• Holyport is already an AQMA.</li> <li>• A330 Ascot Road extremely narrow road by BUPA Nursing Home side wall/Real Tennis Club (two large vehicles cannot pass).</li> <li>• A404/M4.</li> <li>• RBWM will need to make a commitment to getting the A330 at Holyport/Braywick roundabout substantially changed to allow easier access to M4/M40, Maidenhead (Cross Rail).</li> <li>• BFC should arrange an additional motorway junction (junction 9) with feeder roads. Route proposed via enclosed map with (response 030) (route is from Jealott's Hill site northwest to the M4, continuing to Waltham St Lawrence). Proposed development is unacceptable without this.</li> <li>• Not aware of plans for relief road to take traffic from this area to join M4 between J8/9 to ameliorate traffic congestion. If were cost would probably fall on local community reducing opportunities for better use of funds.</li> <li>• Increased traffic levels through the area following the "Smart" improvements to the M4.</li> <li>• Existing levels of congestion on the A3095 to the west.</li> </ul>
<p>962 Stunt</p>	<p>Concerns over the traffic modelling/assessment, including:</p> <ul style="list-style-type: none"> <li>• No ATC has been placed only Bottle Land and Ryehurst Lane in last five years, yet traffic flow has almost tripled.</li> <li>• BFC's model is based on data dating back to 2007 – not fit for purpose. Some recent data was used and discussed within the recent Tilehurst Lane Inquiry but do not consider the model robust evidence in this instance.</li> <li>• Model is high level and centred on Bracknell Town Centre. Binfield is too remote for accurate forecast. Syngenta is even further from the centroid of the model so it is completely inadequate.</li> <li>• Does not comply with LP51 Assessing transport impacts and requirements (transport assessment must be done before adoption of the plan).</li> </ul>
<p>021 Leach, 024 Scott, 039 Ruddle, 047 Holland, 068 Boyd, 076 Rothwell-Boyd, 085 Cope, 192 Parkinson, 196 Mead, 197 Parkinson, 201 Deplodge, 290 Miller, 375 Stock &amp; Stock, 684 Sprakes, 769 Cole, 794 Jones, 807 Jones, 809 Jones, 841 Waleen, 902 Wallen, 925 Cope, 942 Barron, 962 Stunt</p>	<p>There is inadequate detail of the proposed strategic improvement to the road network and junction improvements, including:</p> <ul style="list-style-type: none"> <li>• Only improvements to limited junctions indicated on plan.</li> <li>• The proposed junction changes are unworkable.</li> <li>• Further information needed. BFC need to explain measures to population concerned at an early stage rather than appearing non-committal.</li> <li>• Request for a plan showing the proposed highways infrastructure improvement works to be able to provide an informed response to the consultation. Policies refer to improvement works, but there is no plan of sufficient detail.</li> <li>• One small stretch of road upgrade on A3095 – totally inadequate.</li> <li>• BFC have admitted that it has no plans as to how to manage the additional traffic.</li> <li>• Do not understand how roads can be improved if landowners do not relinquish land for road widening. Also loss of ditches and hedges that support wildlife.</li> </ul>
<p>290 Miller, 841 Wallen, 902 Wallen</p>	<p>Propose the following upgrades:</p> <ul style="list-style-type: none"> <li>• Upgrade the whole of the Maidenhead Road as far as Warfield Street.</li> <li>• Traffic calming and restricting measures on roads likely to receive increased traffic.</li> <li>• Upgrade the Ascot Road/Malt Hill junction.</li> <li>• Upgrade the Cock Lane/Winkfield Road/Bracknell Road/Maidens Green junction.</li> <li>• Consider upgrades to the current traffic light junctions on Warfield Street.</li> </ul> <p>Alternative proposal: Council should consider closing some of the roads partially or in full to vehicles and making them quiet rural roads to support biodiversity, SANG and Green Belt. The lanes include:</p> <ul style="list-style-type: none"> <li>• Bowyers Lane (access only for residents)</li> <li>• Wellers Lane (south of Frost Folly)</li> <li>• Osborne Lane (past The Cut river bridge)</li> <li>• Westhatch Lane (after Scotland's Farm entrance and up to junction with Wellers Lane)</li> </ul>

085 Cope, 096 Hartley, 112 Mitchell, 121 Cox, 124 Kingston, 149 Elmes, 166 Grace, 167 Kingston, 174 Kingston, 175 Bown, 187 Collinson, 188 Ehinger, 190 Elmes, 193 Sauven, 198 Fall, 260 Sharpe, 267 Smith, 287 White, 290 Miller, 356 Stearn, 462 Richmond, 633 Bridges, 637 Nixon, 745 Sandhu, 747 Sandhu, 769 Cole, 794 Jones, 798 Bridges, 807 Jones, 809 Jones, 836 Ehinger, 839 Griffiths, 925 Cope	<p>Highway safety and accident concerns, including:</p> <ul style="list-style-type: none"> <li>• Hazardous junctions and narrow lanes.</li> <li>• Proposals will increase the already high risk of accidents/fatalities for horse riders and cyclists.</li> <li>• Existing single track roads are in poor repair, which will worsen, become dangerous.</li> <li>• Many animals killed on the rural roads.</li> </ul> <p>Locations noted include:</p> <ul style="list-style-type: none"> <li>• Country lanes.</li> <li>• There has already been a very high numbers of accidents and fatalities in the locality (some specifically refer to fatalities on the A330 and nearby Drift Road).</li> <li>• Most fatalities are on the rural road network.</li> <li>• A3095 Maidenhead Rd (5 accidents in 5 years).</li> <li>• Accident blackspot at Maidens Green; A3095 and A330 junction at Hawthorn Hill.</li> <li>• Accident blackspot on A330, including double bends (including motorcyclist fatality; cars in ditches; cars frequently hit wing mirrors; many cars &amp; lorries traverse the centre line of this road in both directions – often such incidents are not reported).</li> <li>• Accident black spot at junction of A330 and A3095.</li> <li>• Poor visibility at junctions (Ascot Road/Malt Hill; and Cock Lane/Winkfield Road/Bracknell Road/Maidens Green)</li> <li>• Malt Hill is an accident black spot.</li> </ul>
096 Hartley, 132 Beck, 148 Graver, 928 Blakemore	<p>Construction traffic concerns, including:</p> <ul style="list-style-type: none"> <li>• Where will construction traffic be routed? How will it be enforced?</li> <li>• Thousands of lorries driving through villages.</li> <li>• 7.5 ton limit signs are already ignored.</li> <li>• The impact to access roads (including Holyport) will be huge for many years to come.</li> <li>• Will traffic be channelled to the Royal Berkshire Polo ground which is already making roads filthy/ruining the countryside.</li> </ul>
119 Vassor	Surprised the Highways Agency can support another large development in the area.
<b>Pedestrian infrastructure</b>	
024 Scott, MacDonald 053, 119 Vassor, 124 Kingston, 149 Elmes, 167 Kingston, 174 Kingston, 177 Gates, 190 Elmes, 193 Sauven, 212 Gates, 251 Kennelly, 400 Mulroy, 462 Richmond, 798 Bridges	<p>Concerns relating to road side pedestrians, including:</p> <ul style="list-style-type: none"> <li>• Some routes already extremely dangerous for pedestrians before development due to lack of pavement/narrow roads, nature of road, lorries mounting pavements, speed limits, increase in traffic etc. – A3095, Osborne Lane, Westhatch Lane, Ascot Road.</li> <li>• Increased traffic/changes to country lanes will reduce pedestrian safety.</li> <li>• Some recommendations made for changes to highways given based on local experience (rep 053 Osborne Lane).</li> <li>• Routes that are currently safe will become dangerous.</li> <li>• Already unsafe to access footpaths from house as no pavement/houses right up to the road (Hawthorn Hill).</li> </ul>
<b>Cycling infrastructure</b>	
025 Fernandes, 205 Singleton	<p>Provision of cycling infrastructure, including:</p> <ul style="list-style-type: none"> <li>• Sceptical of proposed provision of Bracknell – Jealott's Hill dedicated cycle lanes.</li> <li>• A safe cycling network would need to be implemented, connecting Jealott's Hill with schools in the area (see city of Gronigen). This could be CIL-funded.</li> </ul>
073 Stroud, 149 Elmes, 190 Elmes, 310 Osada, 356 Stearn, 748 British Horse Society	<p>Safety concerns relating to cyclists, including:</p> <ul style="list-style-type: none"> <li>• Area is well used by cyclists.</li> <li>• Increased road traffic would reduce safety for cyclists.</li> <li>• Road surfaces in area are adequate/dangerous in places, especially for cyclists; increased traffic will worsen the situation.</li> <li>• Cyclists currently enjoy quiet green belt lanes – they will cease to be appropriate to use.</li> </ul>
205 Singleton	New pedestrian/cycle link should be extended to Bracknell town centre, Maiden's Green, Legoland and National Cycle Route 4 (map and description of route provided). Could be CIL-funded.
<b>Bridleways and footpaths</b>	
401 Donaldson	Welcome provision of a country park.
139 Fitzwilliams, 149 Elmes, 164 Midson, 189 Auster, 213 Makins, 258 Poole & Banbridge, 260 Sharpe, 273 Waddington & Waddington, 304 Greenwood, 310 Osada, 356 Stearn, 388 Taylor, 442 Yates, 558 Sherrington, 650 Sparkes, 808 Manoukian, 832 Manoukian, 838 Belie, 841 Wallen, 884 Manoukian, 902 Wallen, 942 Barron	<p>Concerns over loss of/change to footpaths/off-road routes, including:</p> <ul style="list-style-type: none"> <li>• Area is well used by walkers, runners for leisure (physical and mental wellbeing). Current good network of bridleways, byways and footpaths.</li> <li>• Loss of beautiful Green Belt enjoyed for walking and observing wildlife.</li> <li>• There are 10 Public Rights of Way which run through or along the boundary of the site. 6 are Byways, 3 are Bridleways and one Footpath. They total 8 kms within the site area and create the most significant network of leisure routes within the Borough. They provide a vital off road rural infrastructure for walkers, cyclists, horse riders and carriage drivers which would be unsustainable in its current 'shared' rural character in the light of the proposed development.</li> <li>• Bracknell would lose a key element of its Best Place to Live objective.</li> <li>• There is nothing in the consultation documents to indicate how the legal requirement to retain the PROW routes will be applied.</li> <li>• Mental and physical benefits of access to open space.</li> <li>• Site is interspersed with footpaths and lanes that are publicly accessible already.</li> <li>• Jealott's Hill is a great place to work as you can go for a walk or run at lunchtime.</li> <li>• One of few Green Belt areas with safe and free places to ride a horse or walk a dog.</li> <li>• Loss of amenity would impact people as far as London.</li> <li>• New provision needs to be coordinated with neighbouring authorities.</li> <li>• Good to join site with Binfield, Warfield, Holyport etc.</li> </ul>

<p>017 Rimmer, 065 Sparkes, 073 Stroud, 083 Jenkins, 121 Cox, 125 Mentzel, 149 Elmes, 225 Royall, 273 Waddington &amp; Waddington, 304 Greenwood, 310 Osada, 356 Stearn, 387 Freeman, 442 Yates, 462 Richmond, 684 Sparkes, 748 British Horse Society, 798 Bridges, 838 Belie, 841 Wallen, 902 Wallen</p>	<p>Concerns over loss/change to bridleways and safety for horses, including:</p> <ul style="list-style-type: none"> <li>• Area well used by horse riders and carriage riders.</li> <li>• Horse fatalities have already occurred in the area.</li> <li>• Clarity on plans for the retention and maintenance of bridleways in and surrounding site required – horse riders, cyclists and walkers appear to not be mentioned within plans.</li> <li>• Plan will result in loss of bridleways (and increase in traffic).</li> <li>• Existing safe off road riding network is limited (made worse by signs banning riding within the Cabbage Hill estate).</li> <li>• Existing routes must not be lost, particularly circular routes. Particularly as increased traffic caused by new housing and careless drivers have caused the roads to no longer be safe.</li> <li>• Loss of countryside/rural nature will affect use of Bridleways as will be in a housing estate (e.g. boxed in by fencing) not the countryside.</li> <li>• Imperative bridleways remain as they are – resurfacing would restrict equestrian use.</li> <li>• Recent housing development has resulted in loss of bridleways (and grazing land) – becoming few and far between.</li> <li>• Loss of bridleways very short sighted; will force horse riders onto already congested roads to reach destinations, increasing risk of accidents/fatalities for both riders and drivers. Some question whether BFC will take responsibility for the increase of injuries/deaths resulting from increased traffic.</li> <li>• Too hazardous to ride a horse here now.</li> <li>• Increased road traffic would reduce safety for horse riders. How will they access the off-road routes?</li> <li>• Road crossings will need upgrading for horses to enable safe passage.</li> <li>• Riders choose to keep their horses here to enjoy the off road riding. The British Horse Society (BHS) undertook a comprehensive survey of equestrian businesses and riders - 100% of equestrian owners and businesses agreed that without safe off road riding it was likely that horse owners will choose to keep their horses out of the area (refer to liked economic point).</li> <li>• Appreciates the work of the Rights of Way Officer.</li> </ul>
<p>748 British Horse Society</p>	<p>The proposed single short cycleway indicated on the concept plan would be woefully inadequate. Further consideration must be given to include a fully inclusive off road network of bridleways for all non-motorised users to enjoy for the following reasons:</p> <ul style="list-style-type: none"> <li>• If SANGs policy is to be met 'new good quality recreational opportunities' should be provided, including new bridleways to ensure there is a 'cohesive network' is present, connecting existing bridleways. If this is not done cyclists and horse riders will be forced to continue using roads with further traffic given the congestion.</li> <li>• Proportion of bridleways to other forms of public right of way in Bracknell is just over half the national average which itself is insufficient. Any new public right of way thus must have bridleway status in order to include use by cyclists.</li> <li>• In placing a development in the middle of one of its more rural parishes, the council and the developers need to take this opportunity to ensure that Bridleways are included in the open spaces and around the SANGs if they cannot be placed through them.</li> <li>• In order to meet Natural England's Greenspace Quality criteria SANGs must meet the expectations of the wider community and neighbourhood; I expect new bridleways to be included in the design of this development, and the concept plan does not meet my expectations. It also states SANG areas should be welcoming to all; they should thus be inclusive and accessible to not just walkers and cyclists but horse riders, disabled, elderly, parents with prams and buggies.</li> <li>• Bridleways will benefit the whole community (both new and existing residents) and should be seen as a necessity.</li> <li>• Bridleways enable all to combat obesity, so not including them goes against Natural England's policy to combat obesity and promote physical activity. Developers and Natural England are failing to support this policy by excluding any user (including cyclists and horse riders).</li> <li>• Horse riders seem to be low priority when looking at the Thames Basin policy; this is likely to be because visitor survey statistics are flawed and likely indicate a lower proportion of horse riders than there are.</li> <li>• Statistics show that when added together over 50% of the population either walks, cycles or rides a horse. It thus makes little sense to accommodate only 22% of the population (just walkers).</li> <li>• Natural England have no legal right to prevent bridleways going through or around the site, so site owners has the right to request rights of way are put through the land. Doing so would leave an amazing legacy for future generations of residents.</li> <li>• Bridleways are easier to maintain than footpaths as it is possible to drive a tractor with hedge cutting machinery through them, minimising manpower requirements.</li> <li>• Bridleways should employ a surface that makes them accessible for all, such as Flexi-pave, given the clay soil type.</li> <li>• Improvements to bridleway network are supported by other organisations such as Defra, National Trails, Byway and Bridleway Trust, CTC and International Mountain Bike Association.</li> </ul>
<p><b>COUNTRYSIDE AND GREEN BELT</b> Character, landscape and openness</p>	

<p>002 Bonfante &amp; 322 Bonfante, 021 Leach, 053 MacDondald, 057 Maidens Green Society, 067 Fernandez, 070 Richards, 073 Stroud, 064 Sparkes, 082 Jenkins, 082 Jenkins, 082 Jenkins, 085 Cope, 088 Jones, 101 Bowler, 108 Fernandez, 110 Norman, 111 Norman, 119 Vassor, 121 Cox, 122 Cox, 128 Norton, 130 Hawkes, 132 Beck, 139 Fitzwilliams, 140 Tillet de Clermont-Tonnerre, 146 Beck, 149 Elmes, 151 Kingston, 164 Midson, 165 Gooder, 167 Kingston, 172 Ramsdale, 174 Kingston, 176 Stok, 177 Gates, 178 Stok, 187 Collinson, 188 Ehinger, 189 Auster, 193 Sauven, 194 Etherington, 191 CPRE, 210 Woodbridge, 212 Gates, 213 Makins, 235 Bickley, 251 Kennelly, 254 Mauler, 256 Manning, 257 Rodger, 258 Poole &amp; Banbridge, 260 Sharpe, 261 Scutt, 275 Painter, 276 Street &amp; Street, 305 Shrimpton, 310 Osada, 323 Lumley, 324 Hooker, 331 Lumley, 332 Dimbleby, 349 Hirst, 356 Stearn, 364 Griffiths, 375 Stock &amp; Stock, 376 Holburn, 387 Freeman, 388 Taylor, 393 Kedward, 400 Mulroy, 402 Glover, 462 Richmond, 466 Warfield Environmental Group 470 Warner, 484 S Collings, 608 M Collings, 620 S Peacey, 633 Bridges, 417 Murphy, 462 Richmond, 469 Bottwood, 562 Haan, 563 Bradley, 638 De Roy, 684 Sparkes, 745 Sandhu, 747 Sandhu, 768 Seaman, 769 Cole, 794 Jones, 798 Bridges, 796 Bartlett, 806 Mcalister, 808 Manoukian, 814 Mcalister, 816 Gurney, 828 Strange, 829 Mcalister, 832 Manoukian, 833 Mcalister, 836 Ehinger, 839 Griffiths, 841 Wallen, 870 Bridges, 874 Boorman, 876 Blakemore, 884 Manoukian, 902 Wallen, 925 Cope, 934 Kedwards, 942 Barron, 962 Stunt</p>	<p>Impact upon the rural and open character of the area, including:</p> <ul style="list-style-type: none"> <li>• Does not comply with LP35 Landscape character (outside of defined settlements) and separation of settlements.</li> <li>• Loss of part of defined Landscape Character Area (clay farmland) (refers to policy LP 35 Landscape character).</li> <li>• Character of the area, as described in the LCA, section 7 will be destroyed.</li> <li>• One of the most picturesque areas in Berkshire.</li> <li>• Unspoilt countryside (clay farmlands), pleasant views over farmland, quiet minor roads with few cars, bridleways and footpaths around Frost Folly is perhaps the most important amenity North Bracknell has to offer.</li> <li>• Desire to remain living in a rural/semi-rural environment.</li> <li>• Proposals are wrong in a rural area, will urbanise a rural area.</li> <li>• Irretrievable/irreversible damage to the rural character/landscape/green space.</li> <li>• Significant loss of countryside between Bracknell and Maidenhead.</li> <li>• Material alteration to the countryside aspect of Warfield.</li> <li>• Loss of amenity resulting from urbanisation and loss of natural resources.</li> <li>• Loss of rural nature of local roads – reducing pleasantness of location.</li> <li>• Visual amenity.</li> <li>• Proposals are unacceptably large. High density, high rise development.</li> <li>• Thousands of identical looking houses.</li> <li>• Development should be low density and appropriate to the surrounding countryside.</li> <li>• Proposal is completely out of character with surrounding open countryside and village setting.</li> <li>• Whole village concept would be out of keeping and detrimental.</li> <li>• Development would need to be sympathetic to integrate into the landscape.</li> <li>• Impact on future generations/retain for future generations.</li> <li>• Will be hard to explain to future generations who would have played in fields.</li> <li>• Love and respect home and surroundings, hoped to pass it on to another couple.</li> <li>• Access to countryside is a fundamental human need given people's pressured lives.</li> <li>• Loss of mental and physical benefits of access to open space. Wellbeing.</li> <li>• This area of Green Belt should be preserved for Bracknell's growing population who will be living in high density housing.</li> <li>• Rural character of local historic villages should be protected.</li> <li>• Only 60ha - approx. 25% - of the site will remain green space which is out of proportion with the extreme development.</li> <li>• Comments relating to the loss of the 'Forest' in 'Bracknell Forest' rename 'Bracknell Housing Estate'.</li> <li>• Whilst a significant part of the site will be turned into SANG this will nevertheless change the landscape character.</li> <li>• The proportion of new houses proposed in the countryside (37%) to existing settlements (63%) is too high if the rural landscape around Hawthorn Hill and Jealott's Hill is to be retained.</li> </ul> <p>The majority of respondents commented that the Green Belt should not be developed for these reasons. Contrary to national policy.</p>
<p>002 Bonfante, 053 MacDondald, 057 Maidens Green Society, 094 Barlow, 194 Etherington, 269 Westbury</p>	<p>Preserve/keep the character of Bracknell Forest villages, including:</p> <ul style="list-style-type: none"> <li>• Nearby villages are losing their village identities.</li> </ul>
<p>068 Boyd, 076 Rothwell-Boyd, 085 Cope, 086 Young, 093 Barnes, 095 Young, 098 Baldwin, 099 Menon, 100 Baldwin, 161 Menon, 191 CPRE, 192 Parkinson, 196 Mead, 197 Parkinson, 201 Deplodge, 226 Kennedy, 227 Kennedy, 232 Mackenzie Dodds, 323 Lumley, 329 Woodroffe, 331 Lumley, 345 Woodroffe, 393 Kedward, 406 Whitfield, 436 Kettle, 439 Moss, 444 Moss, 479 Tillbrook, 620 S Peacey, 744 Sandwell, 767 Young, 769 Cole, 770 Bateman, 805 Charlwood, 808 Manoukian, 822 Charlwood, 823 Jordan, 824 Noor, 825 Hodson, 831 Phillips, 832 Manoukian, 834 Oxenham, 841 Wallen, 875 Noor, 877 Noor, 885 Noor, 884 Manoukian, 902 Wallen, 924 Thompson, 925 Cope, 938 Jordan, 940 Cross-Tolley, 942 Barron</p>	<p>High elevation/topography of the proposed site, including:</p> <ul style="list-style-type: none"> <li>• The interconnected visibility with the wider area and undeveloped nature of the surrounding areas will mean that development will have a dramatic and detrimental impact on the landscape.</li> <li>• Development on the slopes and summit of ridge will be able to be viewed from miles around and affect many miles of Green Belt by compromising the open nature of the of the Green belt.</li> <li>• Highly visible site on the top of a hill.</li> <li>• This landscape appraisal rates the sensitivity of the site as Medium-High for development. Much of the landscape is open and on a hill so difficult to mitigate impact on rural area.</li> <li>• BFC agrees that proposals would permanently damage rural landscape/views.</li> <li>• Landscape Sensitivity Appraisal Addendum concludes the sensitivity as medium-high.</li> </ul>

021 Leach, 022 Hunter, 025 Fernandes, 073 Stroud, 081 Keys, 191 CPRE, 275 Painter, 349 Hirst, 375 Stock & Stock	Proposed development will dramatically change/harm scenic/important views, including: <ul style="list-style-type: none"> <li>• Thames Valley</li> <li>• Across Warfield</li> <li>• North and south</li> <li>• Knowl Hill</li> <li>• The Cut Bridleway</li> <li>• Windsor Castle</li> <li>• Hawthorn Lane</li> <li>• Wider landscape</li> <li>• Windsor and Slough</li> </ul>
401 Donaldson 191 CPRE	Serious consideration seems to have been given to the effect on landscape. Some boundaries follow land ownership rather than natural features which reduces effectiveness of landscaping.
022 Hunter, 088 Jones, 119 Vassor, 121 Cox, 133 Clarkson, 164 Midson, 165 Gooder, 167 Kingston, 174 Kingston, 187 Collinson, 190 Elmes, 193 Sauven, 194 Etherington, 198 Fall, 213 Makins, 258 Poole & Banbridge, 267 Smith, 273 Waddington & Waddington, 276 Street & Street, 296 Payne, 324 Hooker, 328 Manning, 349 Hirst, 356 Stearn, 375 Stock & Stock, 380 Barlow, 388 Taylor, 633 Bridges, 390 Harries, 393 Kedward, 462 Richmond, 637 Nixon, 649 Clark, 768 Seaman, 794 Jones, 796 Bartlett, 798 Bridges, 806 Mcalister, 814 Mcalister, 828 Strange, 829 Mcalister, 833 Mcalister, 839 Griffiths, 840 Ratcliffe, 869 Doughty, 870 Bridges, 876 Blakemore, 928 Blakemore, 934 Kedwards, 988 Bonfante 988 Bonfante	Impact to residents, including: <ul style="list-style-type: none"> <li>• Positive aspects of being situated away from a settlement will be lost (no light pollution at night, low air pollution, low ambient noise, low crime and little/no antisocial behaviour).</li> <li>• Impact on quality of life.</li> <li>• Proposals will destroy a way of life for people in Warfield and surrounding areas.</li> <li>• Long-term impacts for the area are not considered in the strategy.</li> <li>• No benefit to existing residents of the area (for example, school places and healthcare are for new residents rather than existing residents).</li> <li>• Unclear what the benefits are for existing borough residents and their families in terms of providing suitable places to live.</li> <li>• 20 years construction work.</li> <li>• Disruption caused by increased numbers of heavy goods and construction vehicles, including overnight parking on agricultural land.</li> <li>• Disruption and inconvenience to residents.</li> <li>• Local needs and requirements will not be paramount to the foreign investors.</li> <li>• No commitment from Syngenta to alleviate the effect of proposals on the community.</li> <li>• The highly successful and lauded Landshare project that supports many charitable groups will have to relocate after years developing the site into the showcase it is now. This will disillusion the hundreds of helpers and volunteers that have worked hard to make this the success it is.</li> <li>• Warfield, Bray and White Waltham Parish Council's vote against the proposal show the lack of net benefit for the wider community.</li> <li>• Community would be better served by maintaining the Green Belt; protecting it from large scale development.</li> </ul>
228 Manoukian, 388 Taylor, 638 De Roy, 808 Manoukian	Encroachment into countryside (para 134 of NPPF). This is particularly the case with the proposal to build on the Eastern site of Ascot Road in proximity to Chawridge Bank SSSI.
<b>Green Belt</b>	
024 Scott, 577 Mullier	Exceptional circumstances are met to release Green Belt.
002 Bonfante, 021 Leach, 063 Silvester, 065 Sparkes, 067 Fernandez, 087 Beardsmore-Gray, 108 Fernandez, 121 Cox, 140 Tillette de Clermont-Tonnerre, 147 Bowen, 149 Elmes, 154 Willatts, 156 Hill, 159 Claridge, 165 Gooder, 167 Kingston, 169 Robinson, 171 Sergent, 172 Ramsdale, 174 Kingston, 175 Bown, 188 Ehinger, 191 CPRE, 217 Mackenzie Dodds, 221 Sinclair, 196 Mead, 233 Newnham, 253 Jerome, 258 Poole & Banbridge, 269 Westbury, 296 Payne, 302 Dove, 316 Devitt, 332 Dimpleby, 349 Hirst, 356 Stearn, 364 Griffiths, 376 Holburn, 191 CPRE, 378 Prior & Craig, 382 Carter, 390 Harries, 393 Kedward, 403 Browne, 404 Hurtado, 417 Murphy, 441 Lawrence, 442 Yates, 446 Brant, 463 Harris, 465 Warfield Environmental Group, 482 Home Farm, 597 Haylor, 636 A & B Brant, 638 De Roy, 646 Depledge, 769 Cole, 788 Blackburn, 796 Bartlett, 799 Saadetian, 810 Plumb, 820 Browne, 821 Browne, 831 Phillips, 836 Ehinger, 839 Griffiths, 840 Ratcliffe, 869 Doughty, 874 Boorman, 876 Blakemore, 925 Cope, 928 Blakemore, 934 Kedwards	Green Belt should not be developed (overarching comment).

<p>021 Leach, 022 Hunter, 024 Scott, 045 Holmes, 053 MacDonald, 057 Maidens Green Society, 072 Robinson, 081 Keys, 151 Kingston, 159 Claridge, 167 Kingston, 175 Bown, 176 Stok, 178 Stok, 261 Scutt, 275 Painter, 300 Redman, 307 Brunander, 315 King, 322 Bonfante, 324 Hooker, 332 Dimbleby, 446 Brant, 484 S Collings, 608 M Collings, 768 Seaman,</p>	<p>Green Belt should not be developed – it will set a precedence for further Green Belt release, including:</p> <ul style="list-style-type: none"> <li>Any future applications for development between Bracknell and Jealott's Hill; and between Jealott's Hill and Maidenhead will just be a formality.</li> </ul>
<p>025 Fernandes, 046 Gale, 069 Gay, 088 Jones, 110 Norman, 111 Norman, 121 Cox, 122 Cox, 314 Chambers, 388 Taylor, 808 Manoukian,</p>	<p>Site contributes to the essential characteristics of the Green Belt of openness and permanence (para 133 of NPPF).</p>
<p>002 &amp; 322 Bonfante, 025 Fernandes, 085 Cope, 096 Hartley, 101 Bowler, 124 Kingston, 139 Fitzwilliams, 151 Kingston, 149 Elmes, 162 Midson, 167 Kingston, 174 Kingston, 190 Elmes, 193 Sauven, 210 Woodbridge, 232 Mackenzie Dodds, 244 Gates, 250 Barnett, 267 Smith, 287 White, 291/294 Thorin, 301 Greenwood, 303 May, 314 Chambers, 323 Lumley, 331 Lumley, 367 Sheikh, 325 Bainborough, 349 Hirst, 367 Sheikh, 375 Stock &amp; Stock, 385 Cruz-Rimmer, 386 Rimmer, 388 Taylor, 389 Popplewell, 390 Harries, 393 Kedward, 408 Robertson, 418 Murphy, 436 Ketley, 439 Moss, 440 Prendergast, 461 Knox-Johnston, 464 &amp; 465 Warfield Environmental Group, 466 Warfield Environmental Group, 482 Home Farm, 508 Cager, 543 Spendlove, 558 Sherrington, 582 Bell, 585 Martin, 620 S Peacey, 633 Bridges, 637 Nixon, 638 De Roy, 684 Sparkes, 739 Richardson, 639 Russell, 745 Sandhu, 747 Sandhu, 767 Young, 769 Cole, 794 Jones, 798 Bridges, 802 Bhandal, 803 Squires, 806 Mcalister, 808 Manoukian, 814 Mcalister, 828 Strange, 829 Mcalister, 833 Mcalister, 836 Ehinger, 841 Wallen, 870 Bridges, 876 Blakemore, 902 Wallen, 927 Fitzell, 928 Blakemore, 933 Glen, 934 Kedwards</p>	<p>Comments relating to exceptional circumstances, including:</p> <ul style="list-style-type: none"> <li>Do not exist.</li> <li>Lack of evidence to justify exceptional circumstances/evidence not available/not 'fully evidenced' and 'justified'.</li> <li>'National and international importance' is not quantified.</li> <li>Lack of consideration of alternatives as required by NPPF para 136 (e.g. 65% of borough is not Green Belt; housing needs met; collaboration needs could be met in existing office space in the Borough; can collaborate with education providers from another site). Not evidenced in the plan.</li> <li>The need for investment into a private company cannot constitute the meaning of exceptional circumstances under s136 of the NPPF.</li> <li>It is not clear that section a), b), or c) of para 137 have been satisfied.</li> <li>Unlikely to withstand legal challenge; will delay the plan overall.</li> <li>Other options have not been considered; other SHELAA sites should be considered.</li> <li>Ample case law shows these are not exceptional circumstances.</li> </ul> <p><i>[Reference should also be made to the use of brownfield sites and underutilised land; economic development; housing need; and consideration of alternatives.]</i></p>
<p>057 Maidens Green Society, 067 Fernandez, 082 Jenkins, 088 Jones, 108 Fernandez, 127 Duncan, 151 Kingston, 191 CPRE, 314 Chambers, 367 Sheikh, 375 Stock &amp; Stock, 388 Taylor, 417 Murphy, 465 and 466 Warfield Environmental Group, 636 A &amp; B Brant, 638 De Roy, 808 Manoukian, 841 Wallen, 902 Wallen</p>	<p>Site contributes to the five purposes of the Green Belt (para 134 of NPPF).</p> <p><i>[Reference should also be made to comments regarding urban sprawl, merger of neighbouring towns, countryside encroachment, historic towns, and the recycling of derelict and other urban land.]</i></p>
<p>068 Boyd, 076 Rothwell-Boyd, 086 Young, 093 Barnes, 095 Young, 098 Baldwin, 099 Menon, 100 Baldwin, 161 Menon, 191 CPRE, 192 Parkinson, 196 Mead, 197 Parkinson, 201 Depodge, 232 Mackenzie Dodds, 329 Woodroffe, 345 Woodroffe, 406 Whitfield, 416 Murphy, 436 Ketley, 439 Moss, 444 Moss, 479 Tillbrook, 744 Sandwell, 767 Young, 770 Bateman, 805 Charlwood, 822 Charlwood, 823 Jordan, 824 Noor, 825 Hodson, 834 Oxenham, 875 Noor, 877 Noor, 885 Noor, 924 Thompson, 938 Jordan, 940 Cross-Tolley, 942 Barron</p>	<p>None of the arguments offered as "exceptional circumstances" relating to "the national and international importance of the agricultural technology work carried out by Syngenta" are "fully evidenced" or "justified" as:</p> <ul style="list-style-type: none"> <li>No reports quantifying the "national and international importance" of the private company's output to Bracknell Forest shared. Question why a private, for-profit company's agenda for releasing circa. £500m of liquidity from land assets for shareholder gain is the primary argument being used for the unjustifiable removal of Green Belt Land.</li> <li>No plans have been shown by Council in event that Syngenta enters financial difficult/deems Jealott's Hill site no longer profitable and withdraws from area (most recent financial filings indicate financial security unsure/operating income in decline (<a href="https://www.syngenta.com/~media/Files/S/Syngenta/2019/Financial%20Report%202018.pdf">https://www.syngenta.com/~media/Files/S/Syngenta/2019/Financial%20Report%202018.pdf</a>))</li> <li>No reports shared quantifying 'national and international importance' of the private company's output to Bracknell Forest.</li> <li>No guarantees from Council that the existing Syngenta site will be developed first prior to any new ground broken.</li> <li>No evidence on the activities, type, extent of level of necessary development. Needs to be a business case.</li> </ul>



<p>068 Boyd, 076 Rothwell-Boyd, 086 Young, 093 Barnes, 095 Young, 098 Baldwin, 099 Menon, 100 Baldwin, 161 Menon, 191 CPRE, 192 Parkinson, 196 Mead, , 197 Parkinson, 201 Depledge, 232 Mackenzie Dodds, 323 Lumley, 329 Woodroffe, 331 Lumley, 345 Woodroffe, 406 Whitfield, 416 Murphy, 436 Ketley, 439 Moss, 444 Moss, 479 Tillbrook, 744 Sandwell, 767 Young, 770 Bateman, 805 Charlwood, 822 Charlwood, 823 Jordan, 824 Noor, 825 Hodson, 834 Oxenham, 875 Noor, 877 Noor, 885 Noor, 924 Thompson, 938 Jordan, 940 Cross-Tolley, 942 Barron</p>	<p>None of the arguments offered as “exceptional circumstances” relating to “the proposed boost in housing supply” are “fully evidenced” or “justified” as:</p> <ul style="list-style-type: none"> <li>• The required 1,877 homes to meet Local Housing Need have already been accounted for in the Draft Local Plan. The 4,000 additional proposed homes are surplus and unnecessary.</li> <li>• NPPF Para. 137 – strategic plan-making authority must demonstrate all other reasonable options for meeting identified need have been examined before concluding exceptional circumstances. Sufficient alternatives to meet housing need have been identified, therefore Plan is unjustified.</li> <li>• Council has a 5 year land supply and has no issue with maintaining a supply of housing land.</li> </ul>
<p>068 Boyd, 076 Rothwell-Boyd, 086 Young, 093 Barnes, 095 Young, 098 Baldwin, 099 Menon, 100 Baldwin, 161 Menon, 192 Parkinson, 196 Mead, 197 Parkinson, 201 Depledge, 226 Kennedy, 227 Kennedy, 232 Mackenzie Dodds, 329 Woodroffe, 345 Woodroffe, 406 Whitfield, 436 Ketley, 439 Moss, 444 Moss, 479 Tillbrook, 744 Sandwell, 767 Young, 770 Bateman, 805 Charlwood, 822 Charlwood, 823 Jordan, 824 Noor, 825 Hodson, 834 Oxenham, 875 Noor, 877 Noor, 885 Noor, 924 Thompson, 938 Jordan, 940 Cross-Tolley, 942 Barron</p>	<p>None of the arguments offered as “exceptional circumstances” relating to “the proposed boost [in] employment” are “fully evidenced” or “justified” as:</p> <ul style="list-style-type: none"> <li>• There have been no guarantees from Syngenta or the Council that any new job creation is secured and will definitely occur immediately after first phase completion/directly as a result of the development.</li> <li>• No guarantees from Council that the existing Syngenta site will be developed first prior to any new ground broken.</li> <li>• There have been no assessments shown by the Council of the number and type of jobs that will be created as a direct result of the development, or that the income from any new job creation will outweigh the loss of Green Belt land and environmental cost of the development.</li> <li>• Green Belt boundaries do not need to be removed to boost employment, as indicated by Syngenta’s intention to reduce the square meters it uses following completion whilst increasing number of jobs.</li> <li>• Development would suffer from brain drain/competitive pressure from larger employment market in Bracknell Town.</li> </ul>
<p>068 Boyd, 076 Rothwell-Boyd, 086 Young, 093 Barnes, 095 Young, 098 Baldwin, 099 Menon, 100 Baldwin, 161 Menon, 192 Parkinson, 196 Mead, 197 Parkinson, 201 Depledge, 232 Mackenzie Dodds, 323 Lumley, 329 Woodroffe, 331 Lumley, 345 Woodroffe, 406 Whitfield, 436 Ketley, 439 Moss, 444 Moss, 479 Tillbrook, 744 Sandwell, 767 Young, 770 Bateman, 805 Charlwood, 822 Charlwood, 823 Jordan, 824 Noor, 825 Hodson, 834 Oxenham, 875 Noor, 877 Noor, 885 Noor, 924 Thompson, 938 Jordan, 940 Cross-Tolley, 942 Barron</p>	<p>Proposed plans contravene purpose 1 of Green Belt land, safeguarding the countryside against encroachment, including:</p> <ul style="list-style-type: none"> <li>• Development would be classed as new settlement – 3+ miles from Bracknell existing settlement edge.</li> <li>• Dramatic increase in traffic would have an urbanising effect on the rural environment. Lack of rail links in walkable distance and limited bus service would mean, for reasonable movement, there would be an unreasonable increase in traffic on local infrastructure (estimates number of additional cars).</li> <li>• Limited details have been provided on the “upgrades” to Maidenhead Road and 3 access junctions. There appears to be no planned upgrades to the other roads through/entrances into the site (gives details).</li> </ul>
<p>068 Boyd, 076 Rothwell-Boyd, 086 Young, 093 Barnes, 095 Young, 098 Baldwin, 099 Menon, 100 Baldwin, 161 Menon, 192 Parkinson, 196 Mead, 197 Parkinson, 201 Depledge, 232 Mackenzie Dodds, 323 Lumley, 329 Woodroffe, 331 Lumley, 345 Woodroffe, 406 Whitfield, 436 Ketley, 439 Moss, 444 Moss, 479 Tillbrook, 744 Sandwell, 770 Bateman, 805 Charlwood, 822 Charlwood, 823 Jordan, 824 Noor, 825 Hodson, 834 Oxenham, 875 Noor, 877 Noor, 885 Noor, 924 Thompson, 938 Jordan, 940 Cross-Tolley, 942 Barron</p>	<p>Proposed plans contravene purpose 2 of Green Belt land, restricting sprawl, as the proposals would see a 960% increase in the area of previously developed land.</p>
<p>068 Boyd, 076 Rothwell-Boyd, 086 Young, 093 Barnes, 095 Young, 098 Baldwin, 099 Menon, 100 Baldwin, 161 Menon, 192 Parkinson, 196 mead, 197 Parkinson, 201 Depledge, 226 Kennedy, 227 Kennedy, 232 Mackenzie Dodds, 323 Lumley, 329 Woodroffe, 331 Lumley, 345 Woodroffe, 406 Whitfield, 436 Ketley, 439 Moss, 479 Tillbrook, 744 Sandwell, 767 Young, 770 Bateman, 805 Charlwood, 822 Charlwood, 823 Jordan, 824 Noor, 825 Hodson, 834 Oxenham, 875 Noor, 877 Noor, 885 Noor, 924 Thompson, 938 Jordan, 940 Cross-Tolley, 942 Barron</p>	<p>Proposed plans contravene purpose 3 of Green Belt land, preventing merging, as the proposals would merge Jealott’s Hill, Hawthorn Hill and Moss end; removing the rural setting of these historical settlements. Ultimate risk of merging entire area with Binfield.</p>

068 Boyd, 076 Rothwell-Boyd, 086 Young, 093 Barnes, 095 Young, 098 Baldwin, 099 Menon, 100 Baldwin, 161 Menon, 192 Parkinson, 196 mead, 197 Parkinson, 201 Deplodge, 226 Kennedy, 227 Kennedy, 232 Mackenzie Dodds, 323 Lumley, 329 Woodroffe, 331 Lumley, 345 Woodroffe, 406 Whitfield, 436 Ketley, 439 Moss, 444 Moss, 479 Tillbrook, 744 Sandwell, 767 Young, 770 Bateman, 805 Charlwood, 822 Charlwood, 823 Jordan, 824 Noor, 825 Hodson, 834 Oxenham, 875 Noor, 877 Noor, 885 Noor, 924 Thompson, 938 Jordan, 940 Cross-Tolley, 942 Barron	Proposed plans contravene purpose 4 of Green Belt land, preserving the setting and character of historic towns, as: <ul style="list-style-type: none"> <li>Archaeological heritage assets are likely to be present across all areas of the site and would be disturbed and/or destroyed by development.</li> <li>Jealott's Farm Listed Buildings would lose agricultural setting and suffer damage.</li> <li>Listed Buildings (Cruchfield Manor, Nuptown House)/buildings proposed for Local Listing (Hawthorndale House) would lose agricultural/rural settings.</li> <li>Hedgerows in site should be regarded as heritage assets due to age/natural development.</li> <li>Warfield Street is a Unique Historic Setting recognised in the Domesday Book and designated an 'Area of Character' by BFC, indicating the Warfield area's rich heritage.</li> </ul>
068 Boyd, 076 Rothwell-Boyd, 086 Young, 093 Barnes, 095 Young, 098 Baldwin, 099 Menon, 100 Baldwin, 161 Menon, 192 Parkinson, 196 mead, 197 Parkinson, 201 Deplodge, 226 Kennedy, 227 Kennedy, 232 Mackenzie Dodds, 323 Lumley, 329 Woodroffe, 331 Lumley, 345 Woodroffe, 406 Whitfield, 436 Ketley, 439 Moss, 444 Moss, 479 Tillbrook, 744 Sandwell, 770 Bateman, 805 Charlwood, 822 Charlwood, 823 Jordan, 824 Noor, 834 Oxenham, 875 Noor, 877 Noor, 885 Noor, 924 Thompson, 938 Jordan, 940 Cross-Tolley, 942 Barron	Proposed plans contravene purpose 5 of Green Belt land, assisting urban regeneration, as the plan to build 130,000+ new square metres of science park is not reasonable while 1 million+ square feet of office space is unoccupied in Bracknell town centre.
189 Auster, 400 Mulroy, 934 Kedwards,	Existing development in Green Belt: <ul style="list-style-type: none"> <li>Precedent for building on Green Belt already exists - Woodhurst Park, Blue Mountain, Amen Corner).</li> <li>Green Belt land already affected by ongoing residential development in Warfield and Binfield.</li> <li>Over 30% of local green belt developed in the last year changing rural feel of area.</li> <li>Nationally 8,143 homes built on Green Belt in 2017/18; this will thus unjustifiably equate to half the homes built on Green Belt a year.</li> </ul>
205 Singleton	Release of site from Green Belt would only be acceptable if overall area of Green Belt in Bracknell Forest remains the same; proposed mitigation is insufficient.
841 Wallen, 902 Wallen	Site represents 6% of the Green Belt in the Borough – unactable reduction.
232 Mackenzie Dodds, 244 Gates, 301 Greenwood, 314 Chambers, 322 Bonfante, 385 Cruz-Rimmer, 386 Rimmer, 388 W Taylor, 389 Popplewell, 390 Harries, 582 Bell, 798 Bridges, 802 Bhandal, 803 Squires, 806 Mcalister, 808 Manoukian, 814 Mcalister, 828 Strange, 829 Mcalister, 833 Mcalister, 835 Taylor, 870 Bridges, 923 de Roy, 937 Silverston	The proposal does not meet the relevant criteria in the NPPF regarding the Green Belt (paras noted include 133, 134, 136, 137, 145 & 146).
267 Smith, 302 Dove, 543 Spendlove, 585 Martin, 942 Barron	Should protect the Green Belt for future generations, including: <ul style="list-style-type: none"> <li>Refer to 2010 Natural England and CPRE report, Green Belts: A greener future, which calls enhance Green Belt protection for future generations.</li> <li>Present an exciting vision for the future of Syngenta instead: surrounded by thriving wildlife-friendly farmland – open and permanent Green Belt countryside for everyone.</li> </ul>
418 Murphy	Noted that the Plan acknowledges site does not meet NPPF criteria for changing Green Belt boundaries.
349 Hirst	Development of a small town is inappropriate in the Green Belt.
375 Stock & Stock	Green Belt is countryside to be enjoyed by everyone and needs to be preserved for growing population of Bracknell. It is important for leisure, health & wellbeing, food production, wildlife and biodiversity. With climate emergency and biodiversity decline, Green Belt is more valuable than ever and must be preserved and protected.
806 Mcalister, 814 Mcalister, 828 Strange, 829 Mcalister, 833 Mcalister, 870 Bridges,	Contravenes BF stated Local Plan Green Belt Strategy (para 4.25).
<b>HISTORIC ENVIRONMENT</b>	
021 Leach	Proposed development too close to St Michael's parish church and residential buildings of significant value.
021 Leach	Proposed development too close to plague victims' burial grounds.
028 Manning	Sceptical of proposed consideration of 'historic environment' (should include Jealott's Farm) – development in area has already wiped out buildings of local/national interest; cultural/rural past being lost and must be protected.
028 Manning	Jealott's Farm should be put to good use – could be cultural centre.
090 Halfacre	Will cause increased traffic through Holyport Conservation Area.
101 Bowler, 149 Elmes, 151 Kingston, 307 Brunander, 798 Bridges, 806 Mcalister, 814 Mcalister, 828 Strange, 829 Mcalister, 833 Mcalister, 870 Bridges,	Warfield is an ancient settlement mentioned in the Domesday Book.
393 Kedward, 191 CPRE	Potential damage/loss to listed buildings/ significant and valuable rural and heritage assets.
191 CPRE	In absence of detailed proposals unable assess impact on heritage assets.



307 Brunander	Cruchfield Manor is Grade II listed dating back to 1100. Owners have included Henri I, Alan de Nuvill, Eleanor of Provence (wife to Henry III), Sir Reynold Bray and Peter Cadbury. Current owners have invested a large amount in professional fee to do anything at the property (e.g. one year's work for gates). Therefore, seems ludicrous to destroy the agricultural setting and surroundings. Economic impact to property. Proposal will destroy this part of history for the economic benefit of a foreign government, to the loss of their own taxpaying residents. Restoration of the property contributes to the local economy.
807 Jones, 809 Jones,	Setting of Grade II Listed Cruchfield Manor will be impacted significantly by junction alterations for roundabouts and accompanied lighting.
<i>[Refer to further heritage comments in relation to purpose 5 of the Green Belt.]</i>	
<b>NATURAL ENVIRONMENT</b>	
<b>Overarching</b>	
063 Silvester, 069 Gay, 070 Richards, 079 Richards, 095 Young, 108 Fernandez, 124 Kingston, 137 Jones, 148 Graver, 164 Midson, 165 Gooder, 169 Robinson, 233 Newnham, 238 Beni, 322 Bonfante, 388 Taylor, 404 Hurtado, 461 Knox-Johnston, 462 Richmond, 799 Saadetian, 806 Mcalister, 814 Mcalister, 815 Barlow, 819 Olivian, 828 Strange, 829 Mcalister, 833 Mcalister, 839 Griffiths, 870 Bridges, 925 Cope, 942 Barron, 988 Bonfante	Proposals would damage the environment, including: <ul style="list-style-type: none"> <li>• Change in political direction regarding the environment towards much greater protection of our natural world, fuelled by growing public anger, hopeful that BFC will put itself ahead of the curve. Plan goes against every modern train of thought.</li> <li>• Environment is under incredible stress.</li> <li>• Need to make difficult decisions – do the right thing.</li> <li>• Climate change is agreed upon by all political parties as the most critical issue to address – loss of c600 acres farmland and woodland will add to cumulative effect of climate change/cannot be justified.</li> <li>• Current environmental crisis – should be planting trees. Do something positive with the site.</li> <li>• Large scale damage will occur during construction even before homes are built.</li> </ul>
021 Leach, 083 Cope, 124 Kingston, 167 Kingston, 174 Kingston, 177 Gates, 194 Etherington, 212 Gates, 251 Kennelly, 253 Jerome, 382 Carter, 393 Kedward, 636 A & B Brant, 417 Murphy, 446 Brant, 839 Griffiths, 934 Kedwards, 942 Barron	Loss of agricultural land/farmland, including: <ul style="list-style-type: none"> <li>• Loss of huge area/200 hectares for arable farming.</li> <li>• The lungs of the area – air purification, carbon capture, drainage, conservation, wildlife. All will be reduced.</li> <li>• Top grade agricultural land which is mainly actively farmed arable land.</li> <li>• Impact on farming enterprise.</li> <li>• Poor use of high-grade farming land.</li> <li>• Land would have been used to grow food; where will this be produced now?</li> <li>• Land should be returned to agricultural use.</li> <li>• Irreplaceable.</li> <li>• Council agrees that housing development is a poor use of high-quality agricultural land.</li> <li>• Further study needed to determine whether best and most versatile agricultural land.</li> </ul>
988 Bonfante	Hypocritical that Syngenta seeks to save land from degradation and enhance biodiversity, yet on the next breath they then seek to destroy the beautiful Green Belt fields at their largest global research and development site at Jealott's Hill.
988 Bonfante	Would be better to turn the site into a community farm.
053 MacDondald, 062 Smith, 065 Sparkes, 139 Fitzwilliams, 147 Bowen, 167 Kingston, 187 Collinson, 251 Kennelly, 254 Mauler, 256 Manning, 275 Painter, 375 Stock & Stock, 400 Mulroy, 838 Belie	Green spaces should be kept: <ul style="list-style-type: none"> <li>• For its own sake.</li> <li>• For the safety and enjoyment of dog walkers and horse riders.</li> <li>• As we are running out of them.</li> <li>• Given mental and physical benefits of access.</li> <li>• For environmental reasons.</li> <li>• For the safety of already dispersed wildlife and habitats.</li> <li>• So many have already been built on.</li> </ul>
079 Richards, 148 Graver, 256 Manning	Once land is removed it cannot be replaced.
073 Stroud	Indefensible to destroy environment for no pressing reason.
122 Cox, 124 Kingston, 191 CPRE, 261 Scutt, 324 Hooker, 466 Warfield Environmental Group, 633 Bridges, 794 Jones, 798 Bridges, 806 Mcalister, 807 Jones, 809 Jones, 814 Mcalister, 815 Barlow, 828 Strange, 829 Mcalister, 833 Mcalister, 841 Wallen, 870 Bridges, 902 Wallen	Proposals would result in light pollution, including: <ul style="list-style-type: none"> <li>• Light pollution is currently very limited in the area.</li> <li>• Warfield Neighbourhood Plan includes a dark skies policy (WNP13).</li> <li>• Detrimental effect on wildlife, including nocturnal insects and mammals (e.g. tawny and barn owls, badgers, several bat species and a wide range of moths present in the area).</li> <li>• Residents pleaded not to have lighting at Watersplash Lane development – BFC overruled on safety ground.</li> <li>• Particularly harmful given prominence.</li> <li>• Original permission for current use, unlike proposals, presumably was given due to the lack of light pollution.</li> </ul>
927 Fitzell	No environmental assessment of any kind has been considered on either the loss of the Green Belt or the works to be done in the resulting conurbation.
769 Cole	Site is directly under Heathrow flight path – impact of aircraft noise.
<b>Biodiversity, designated sites, green infrastructure</b>	
401 Donaldson	Serious consideration appears to have been given to the effect on local biodiversity.

<p>002 Bonfante &amp; 322 Bonfante, 021 Leach, 053 MacDondald, 065 Sparkes, 068 Boyd, 069 Gay, 070 Richards, 073 Stroud, 076 Rothwell-Boyd, 079 Richards, 081 Keys, 083 Money, 085 Cope, 088 Jones, 094 Barlow, 101 Bowler, 109 Hayden Kellard, 119 Vassor, 121 Cox, 122 Cox, 124 Kingston, 137 Jones, 148 Graver, 151 Kingston, 165 Gooder, 167 Kingston, 169 Robinson, 172 Ramsdale, 174 Kingston, 175 Bown, 177 Gates, 188 Ehinger, 191 CPRE, 192 Parkinson, 193 Suaven, 197 Parkinson, 201 Deplodge, 212 Gates, 214 Symes, 217 Mackenzie Dodds, 226 Kennedy, 227 Kennedy, 228 Manoukian, 232 Mackenzie Dodds, 233 Newnham, 251 Kennelly, 254 Mauler, 258 Poole &amp; Banbridge, 261 Scutt, 265 Mackenzie, 267 Smith, 269 Westbury, 275 Painter, 276 Street &amp; Street, 294 Thorin, 307 Brunander, 323 Lumley, 324 Hooker, 331 Lumley, 332 Dimbleby, 349 Hirst, 391 MacKenzie, 393 Kedward, 400 Mulroy, 402 Glover, 404 Hurtado, 408 Robertson, 440 Prendergast, 462 Richmond, 466 Warfield Environmental Group, 469 Bottwood, 484 S Collings, 608 M Collings, 633 Bridges, 637 Nixon, 649 Clark, 684 Sparkes, 745 Sandhu, 747 Sandhu, 767 Young, 768 Seaman, 769 Cole, 788 Blackburn, 794 Jones, 798 Bridges, 799 Saadetian, 806 Mcalister, 807 Jones, 808 Manoukian, 809 Jones, 810 Plumb, 814 Mcalister, 815 Barlow, 819 Olivian, 828 Strange, 829 Mcalister, 833 Mcalister, 836 Ehinger, 841 Wallen, 870 Bridges, 902 Wallen, 925 Cope, 933 Glen, 934 Kedwards, 942 Barron</p>	<p>Impact of development on biodiversity (wildlife, habitats, eco-systems), including:</p> <ul style="list-style-type: none"> <li>• Loss of well-established ecosystems given interdependence of species (cannot be replaced).</li> <li>• Loss of biodiversity; substantial reduction in flora on a large area of the site.</li> <li>• Substantial areas of native bluebells and ancient and/or well established hedges.</li> <li>• Jealott's Hill supports a wide range of wildlife including ground nesting birds, lapwings, migrating birds, red kites, barn owls, tawny owls, kestrels, sparrow hawks, larks, pheasants, bats, rabbits, foxes, badgers, hedgehogs, moths, newts and other amphibians, weasels, voles, stoats, hedgehogs, insects/pollinators (impact to wider area through loss of pollinators).</li> <li>• Great Crested Newts seen in the ford at Pendry's Lane in 2019.</li> <li>• Proximity to Chawridge Bank SSSI.</li> <li>• Ancient Woodland will be lost. Deforestation.</li> <li>• Loss of relatively undisturbed habitats around Syngenta.</li> <li>• Winding roads will need to be adapted for extra traffic – increased biodiversity loss (e.g. hedgerows across wider area).</li> <li>• Species are established; cannot be replaced by simply planting some trees in a different location.</li> <li>• Under previous management, ecology was well managed on site.</li> <li>• Protected BAP wildlife.</li> <li>• Amount of recent development in north of Bracknell Forest Council – cumulative impact on biodiversity. Wildlife has been pushed north.</li> <li>• Loss of amenity as a result of irreversible damage to wildlife.</li> <li>• Proposal would contravene the Council's stated objective of conserving and enhancing biodiversity.</li> <li>• Should be planting 4000 trees, not houses.</li> <li>• If there is spare land at Syngenta, it should be retained for agriculture or nature reserve.</li> <li>• Hypocritical for a business that seeks to improve and enhance plant science and agriculture crops to rip up beautiful plant life and trees.</li> <li>• Original permission for current use, unlike proposals, presumably was given due to close integration into the local natural world with extensive biodiversity.</li> <li>• Biodiversity is not well documented so a proper survey should be undertaken.</li> <li>• Survey needed for Drown Boy Pond (newts), bats, other habitats.</li> <li>• Higher levels of air pollution can have a detrimental effect on species.</li> <li>• Will be hard to explain the loss of open spaces full of wildlife to future generations.</li> <li>• Climate change impact as a result of loss of plants.</li> </ul>
<p>139 Fitzpatrick, 466 Warfield Environmental Group, 806 Mcalister, 814 Mcalister, 828 Strange, 829 Mcalister, 833 Mcalister, 870 Bridges</p>	<p>Impact on hedgerows specifically, including:</p> <ul style="list-style-type: none"> <li>• Development as proposed of much of the current farm land will result in wholesale destruction of field hedgerows contrary to current legal constraints &amp; stated BFC policy.</li> <li>• New planting cannot mitigate for the lost biodiversity inherent in ancient hedgerows, the shelter and safe passage they provide.</li> </ul>
<p>148 Graver, 167 Kingston, 174 Kingston, 175 Bown, 217 Mackenzie Dodds, 307 Brunander, 388 Taylor, 466 Warfield Environmental Group, 484 S Collings, 608 M Collings, 684 Sparkes, 794 Jones, 808 Manoukian, 934 Kedwards</p>	<p>Concerns relating to SANGS:</p> <ul style="list-style-type: none"> <li>• Green space created for people to walk their dogs are not natural environments and the wildlife will be lost forever.</li> <li>• Recreation and improved biodiversity are incompatible.</li> <li>• Creating a small area of SANG on current greenfield site will result in loss of established habitats.</li> <li>• All SANGs to date have simply been grassland with limited value to wildlife because of its openness and volume of visitors.</li> <li>• Small areas densely used. Create issues with dog fouling, poor behaviour (especially illicit night time use).</li> <li>• SANG changes the nature of the area e.g. more cars visiting. Issues with car parking at Cabbage Hill.</li> <li>• Will attract people and traffic from a distance.</li> <li>• Creation of 2 SANGS will not compensate for loss of amenity to resident.</li> <li>• Horse riders cannot use SANGs; Natural England will not allow bridleways within a SANGs despite a lack of evidence to support this – horses do not pose any threat to wildlife.</li> </ul> <p><i>[Refer also to comments on site concept plan]</i></p>
<p>068 Boyd, 076 Rothwell-Boyd, 086 Young, 093 Barnes, 095 Young, 098 Baldwin, 099 Menon, 100 Baldwin, 161 Menon, 192 Parkinson, 196 mead, 197 Parkinson, 201 Deplodge, 226 Kennedy, 227 Kennedy, 232 Mackenzie Dodds, 323 Lumley, 329 Woodroffe, 331 Lumley, 345 Woodroffe, 406 Whitfield, 436 Kettle, 439 Moss, 444 Moss, 479 Tillbrook, 466 Warfield Environmental Group, 744 Sandwell, 770 Bateman, 805 Charlwood, 822 Charlwood, 823 Jordan, 824 Noor, 825 Hodson, 834 Oxenham, 875 Noor, 877 Noor, 885 Noor, 924 Thompson, 938 Jordan, 940 Cross-Tolley, 942 Barron</p>	<p>It is inappropriate to argue that the harm caused by the proposed excessive removal of habitats is clearly outweighed by other considerations as:</p> <ul style="list-style-type: none"> <li>• The proposed development is located inside the 7km SPA boundary.</li> <li>• The agri-habitats &amp; hedgerows provide habitats, nesting sites and/or food supply for protected bird species (Skylarks, Red Kites); nesting sites/habitats would be directly removed by housing (includes details of designations).</li> <li>• High likelihood of protected species living in site (Badgers, Great Crested Newts, Bats, Stag Beetles – includes details of designations/offences)</li> <li>• Hedgehogs live in Moss End area (includes details of designations, recent decline and movements at night). Scale of housing development would remove key habitats and increase road deaths.</li> <li>• Site includes hedgerows, lowland woodland and ponds which constitute UK priority habitats.</li> <li>• Council's suggestion that single car width, lightly tarmacked country lanes without any further development within site can support 8,000 new cars in unreasonable. Development would therefore require widening and the destruction of hedgerow habitats that line the full length of the lanes.</li> <li>• Landscaped man-made areas are not equal replacements for long standing and naturally occurring agri-habitats and hedgerow habitats.</li> </ul>

304 Greenwood 139 Fitzpatrick, 294 Thorin, 466 Warfield Environmental Group, 942 Barron	BFC has always had very dedicated Rangers who look so well after the land that is now under threat. Ecological value of Jealott's Hill Community Landshare, including: <ul style="list-style-type: none"> <li>It is proposed that the Jealott's Hill Community Landshare scheme should move from its current site. To do so would involve the destruction of an established/mature 450 tree orchard in total contradiction to both the spirit and the letter of the current BFC Biodiversity Action Plan (Woodland Objective 1). It is one of, if not the biggest orchard in Berkshire supporting 77 varieties of flora. The orchard needs to be protected.</li> <li>Orchards are a priority habitat in the current Bracknell Forest Biodiversity Action Plan</li> </ul>
338 BBOWT	Concerns about impact on nearby BBOWT nature reserve, SSSI and Local Wildlife Sites. Land at Jealott's Hill is close to BBOWT's nature reserve Chawridge Bank, an area of old Berkshire grassland. It is part of Chawridge Bourne SSSI, designated as area of unimproved grassland, scrub and broadleaved woodland, stream & ancient parish boundary hedge. SSSI contains rare plants.
338 BBOWT	Several local wildlife sites close by including Hog Oak Lane and Woodland LWS and Woodland adjacent to Hog Oak Lane LWS, Fernygrove Copse LWS and Lordlands Wood LWS. Last three of these lie in RBWM but close to Jealott's Hill.
338 BBOWT	Chawridge Bank nature reserve is open access with direct footpath from Jealott's Hill and likely to suffer direct & indirect impacts from increased population and recreational pressures. Impacts include: cat predation, possible fly-tipping, possible uncontrolled fires, trampling, disturbance and nutrient enrichment from dog fouling, damage through erosion from higher footfall. Increased population will increase car journeys / air pollution leading to nitrogen deposition which can affect species diversity, particularly on low-nutrient habitats such as this SSSI grassland.
338 BBOWT	Chawridge Bank is SSSI so legal duty to prevent harm. Should require mitigation through S106 commitments within policy for this site. Also expect provision to avoid impacts from Jealott's Hill by designing the open space and SANG to accommodate dog walkers within site to discourage recreational use of the nature reserve and SSSI. Any mitigation / compensation habitat must be provided before development begins.
338 BBOWT	Site is allocated for 4,000 new homes 1,200 of which completed during plan period. Draft IDP says part of site is within 5-7km of TBH SPA and is required to provide bespoke on-site SANG. This is suggested to be 5.5 ha based on 1,200 dwellings (based on at least 2 hectares per 1,000 persons). But total number of new homes will be 4,000, so SANG should be based on this not 1,200. Area allocated for SANG appears very narrow in places to E & W of the site. Further information needed about habitats to be created.
525 Seville	The proposed green open spaces and parks that would promote biodiversity and an appreciation of the outdoors will benefit the Bracknell area.
<b>CLIMATE CHANGE AND SUSTAINABILITY</b>	
228 Manoukian, 244 Gates, 301 Greenwood, 314 Chambers, 367 Sheikh, 385 Cruz-Rimmer, 386 Rimmer, 388 Taylor, 389 Popplewell, 390 Harries, 582 Bell, 638 De Roy, 798 Bridges, 802 Bhandal, 803 Squires, 808 Manoukian, 835 Taylor, 923 de Roy, 937 Silverston	Contravenes NPPF regarding sustainable development (para 8), including: <ul style="list-style-type: none"> <li>Para 8a economic objective – site is neither the right type not in the right place. Unsustainable location. Alternatives available.</li> <li>Para 8c environmental objective – does not satisfy any of this objective</li> </ul>
228 Manoukian, 244 Gates, 301 Greenwood, 314 Chambers, 367 Sheikh, 385 Cruz-Rimmer, 386 Rimmer, 388 Taylor, 389 Popplewell, 582 Bell, 638 De Roy, 798 Bridges, 802 Bhandal, 803 Squires, 806 Mcalister, 808 Manoukian, 814 Mcalister, 828 Strange, 829 Mcalister, 833 Mcalister, 835 Taylor, 870 Bridges, 923 de Roy, 937 Silverston	Contravenes NPPF para 148 and 149 – support transition to low carbon future and mitigating and adapting to climate change.
176 Stok, 178 Stok, 265 Mackenzie, 276 Street & Street, 798 Bridges, 841 Wallen, 806 Mcalister, 811 Bridge, 812 Bridge, 814 Mcalister, 828 Strange, 829 Mcalister, 833 Mcalister, 870 Bridges, 902 Wallen	Fails to meet requirements of policies LP1 sustainable development principles and LP2 Sustainable locational principles (remote from major facilities).
244 Gates, 304 Greenwood, 325 Bainborough, 367 Sheikh, 385 Cruz-Rimmer, 386 Rimmer, 388 W Taylor, 389 Popplewell, 390 Harries, 582 Bell, 798 Bridges, 802 Bhandal, 803 Squires, 806 Mcalister, 808 Manoukian, 814 Mcalister, 828 Strange, 829 Mcalister, 832 Manoukian, 833 Mcalister, 835 Taylor, 870 Bridges, 884 Manoukian, 923 de Roy, 937 Silverston	Direct conflict with section 9.1 'Climate Change' and should be removed.

244 Gates, 304 Greenwood, 311 Manoukian, 325 Bainborough, 367 Sheikh, 385 Cruz-Rimmer, 386 Rimmer, 388 W Taylor, 389 Popplewell, 390 Harries, 582 Bell, 798 Bridges, 802 Bhandal, 803 Squires, 806 Mcalister, 814 Mcalister, 828 Strange, 829 Mcalister, 832 Manoukian, 833 Mcalister, 835 Taylor, 870 Bridges, 884 Manoukian, 923 de Roy, 937 Silverston	Direct conflict with section 9.2 'The Natural Environment' & LP15 Green Infrastructure and should be removed.
094 Barlow, 124 Kingston, 146 Bell, 151 Kingston, 167 Kingston, 559 Coker, 928 Blakemore	Comments relating to carbon neutrality, including: <ul style="list-style-type: none"> <li>Proposals would contravene Borough's stated aim of working towards carbon neutral emissions.</li> <li>Must adhere to BFC's Climate Change Action Plan 2016.</li> <li>Planned development needs to be carbon neutral.</li> <li>The suggestion of carbon neutral is a sound bite which will not be the practical effect on residents.</li> <li>Whilst the new development will be carbon-free there is no suggestion that construction will be.</li> <li>Is there a carbon emission statement for construction of the development?</li> </ul>
228 Manoukian, 244 Gates, 304 Greenwood, 325 Bainborough, 367 Sheikh, 385 Cruz-Rimmer, 386 Rimmer, 388 Taylor, 389 Popplewell, 390 Harries, 582 Bell, 633 Bridges, 637 Nixon, 638 De Roy, 639 Russell, 798 Bridges, 802 Bhandal, 803 Squires, 806 Mcalister, 808 Manoukian, 814 Mcalister, 828 Strange, 829 Mcalister, 832 Manoukian, 833 Mcalister, 835 Taylor, 870 Bridges, 884 Manoukian, 923 de Roy, 937 Silverston	Should not be permitted under the Climate Change Act 2008 and the Planning and Compulsory Purchase Act 2004 (19(1A)), including: <ul style="list-style-type: none"> <li>Proposal would not contribute to the mitigation of climate change and help meet the UK's requirements of significant emission reductions of at least 100% by 2050 ('net zero').</li> <li>Section 19(1A) of the Planning and Compulsory Purchase Act 2004 requires LPAs to include in their Local Plans 'policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change'. Evidence needed that this proposal meets requirements in this regard.</li> <li>Green Belt land plays a major role in offsetting the damaging effects of climate change.</li> </ul>
253 Jerome	All new builds should be built to cope with climate change. All buildings should be insulated all over (walls, doors, ceilings, roofs). Solar panels should cover all roofs.
233 Newnham, 417 Murphy, 461 Knox-Johnston, 841 Wallen, 902 Wallen	Farmland/soil contributes to carbon storage/sink and climate change mitigation.
417 Murphy, 466 Warfield Environmental Group, 684 Sparkes, 841 Wallen, 902 Wallen	Sustainability Appraisal, including: <ul style="list-style-type: none"> <li>Site does not meet sustainability criteria.</li> <li>This site receives the lowest score in the Sustainability Appraisal, even after mitigation, so it cannot be considered as a suitable or viable site. Nothing has changed with respect to this site since the last Public Consultation.</li> <li>The SA demonstrates that WAR3 is the poorest for sustainability, even mitigated, of any site, with three 'xx' scores and 3 'x' scores, just one other site has two 'xx' scores; three have one 'xx'. Adverse impacts of WAR 3 in terms of landscape, resource (farmland) use, poor access to services, travel and land use are all unchanged after mitigation: i.e. it is a poor choice of site and this cannot be mitigated. Its impacts over short to long term are negative for SA1 climate change ("isolated from settlements, routes to the site are physically restricted which may limit the potential to achieve sustainable transport improvements"), SA4a Landscape ("The most significant land impact as a result of the proposed site allocation"), SA7a Resources ("a 242 ha site largely in agricultural use"), and SA17 travel choice ("Transport is a key issue ... isolated from other settlements, especially Bracknell Town Centre and other larger centres beyond the Borough boundary. Routes to the site are physically restricted which may limit the potential to achieve sustainable transport improvements"). Overall, allocation of this site will impede meeting SA objectives and policy related to addressing climate change. [Also summarised under SA]</li> <li>SA acknowledges wastewater treatment has been overlooked.</li> </ul>
794 Jones	Shouldn't be trying to damage and ruin a protected area of land that younger generations are trying to save when young climate activists such as Greta Thunberg are protesting to stop climate change. Younger generations do not want to fix mistakes based in greed made now by those, including the Council, who will not experience the consequences.
<b>Pollution and hazards</b>	
057 Maidens Green Society, 069 Gay, 079 Richards, 109 Hayden Kellard, 112 Mitchell, 124 Kingston, 148 Graver, 149 Elmes, 151 Kingston, 190 Elmes, 251 Kennelly, 254 Mauler, 294 Thorin, 324 Hooker, 374 Oakley Green & Fifield Residents Association, 382 Carter, 402 Glover, 462 Richmond, 841 Wallen, 869 Doughty, 901 Wallen, 925 Cope	Impact upon air quality, including: <ul style="list-style-type: none"> <li>Pollution will be high given proposed concentration of 4,000 homes leading to more traffic.</li> <li>Cumulative impact with new third runway increasing flights and therefore pollution over the area.</li> <li>No traffic/air quality mitigation is proposed.</li> <li>Air quality can a detrimental impact to species.</li> <li>Original permission for current use, unlike proposals, presumably was given due to the very low levels of air pollution.</li> <li>Pollution already over accepted levels.</li> <li>Recent studies show that anyone living within 50 metres of a busy road is most at risk to suffer any of 13 health complaints including lung cancer, bronchitis, asthma, heart disease etc.</li> <li>PM2.5 limits are currently more than double WHO guidelines. Children and unborn children are the most vulnerable, particles can invade the placenta. Great increase in children suffering asthma in the Bracknell area.</li> </ul>

068 Boyd, 076 Rothwell-Boyd, 086 Young, 093 Barnes, 095 Young, 098 Baldwin, 099 Menon, 100 Baldwin, 161 Menon, 192 Parkinson, 196 mead, 197 Parkinson, 201 Deplodge, 226 Kennedy, 227 Kennedy, 232 Mackenzie Dodds, 323 Lumley, 329 Woodroffe, 331 Lumley, 345 Woodroffe, 406 Whitfield, 436 Ketley, 439 Moss, 444 Moss, 479 Tillbrook, 744 Sandwell, 767 Young, 770 Bateman, 805 Charlwood, 822 Charlwood, 823 Jordan, 824 Noor, 825 Hodson, 834 Oxenham, 875 Noor, 877 Noor, 885 Noor, 924 Thompson, 938 Jordan, 942 Barron	Site is in Groundwater Protection Zone 3 – removal of trees and hedgerows, which reduce surface water, will increase risk of mineral and chemical pollution.
375 Stock & Stock	How environmentally safe is the R&D of herbicides, fungicides, insecticides and crop enhancing chemicals, which kill and pollute?
<b>Flood risk</b>	
079 Richards, 081 Keys, 120 Sparkes, 121 Cox, 124 Kingston, 151 Kingston, 167 Kingston, 217 Proddow, 6ss Bridges, 260 Sharpe, 380 Barlow, 461 Knox-Johnston, 508 Cager, 798 Bridges, 806 Mcalister, 814 Mcalister, 815 Barlow, 828 Strange, 829 Mcalister, 833 Mcalister, 841 Wallen, 870 Bridges, 902 Wallen	<p>Flood risk, including:</p> <ul style="list-style-type: none"> <li>As a large green area, the site currently prevents further flooding to surrounding lower areas which already suffer from excess flooding/drainage is barely adequate; proposals would reduce this functionality.</li> <li>Flooding already occurs at the bottom of Hogoak Lane in Lupton and on A330 towards Maidens Green.</li> <li>Increased flood risk due to additional roads/housing and loss of trees/hedgerows.</li> <li>Site is in Flood Zone 1 so has a high risk of flooding in some areas. May become worse with climate change. Cannot be assessed until Environment Agency remodel The Cut watercourse that is close to site.</li> <li>Has any assessment been offered on the above issues?</li> </ul>
<b>Land potentially affected by contamination</b>	
021 Leach	Land is contaminated with GM products.
<b>FIGURE 6 ILLUSTRATIVE CONCEPT PLAN</b>	
021 Leach, 250 Barnett, 466 and 477 Warfield Environmental Group, 794 Jones, 807 Jones, 809 Jones, 841 Wallen, 902 Wallen	<p>Issues with the location/layout of features, including:</p> <ul style="list-style-type: none"> <li>SANG inappropriately located: <ul style="list-style-type: none"> <li>not enough SANG through centre of proposed development/around existing housing.</li> <li>SANG pushed to narrow strips round the perimeter.</li> <li>No N-S or E-W greenways, animal corridors etc.</li> </ul> </li> <li>School located next to Syngenta workplace is not appropriate for drop off to school.</li> <li>Primary school at main entrance to site is inappropriate – close to active chemistry research laboratories and close to A3095.</li> <li>Development too close to sewage works/works don't have capacity for development.</li> <li>Site is bisected by two busy roads with fast moving traffic.</li> <li>Does not show the copse to the east of Wellers Lane – shown as a new housing area which is contrary to the LSA Addendum for WAR3c.</li> <li>What will happen with the recycling centre east of Wellers Lane? Ideally be removed and expand the copse. Assessment needed. Not mentioned in policy or supporting documents.</li> <li>Site is dissected by two main busy roads – site not suitable.</li> <li>Orchard area on Jealott's Hill Community Landshare site should be shown and protected.</li> <li>Concept Plan shows the area of a woodland copse (Wellers Copse) to the east of Wellers Lane as a new housing. This copse must be protected. Failing to do this is contrary to the LSA Addendum for WAR3c that recommends: "Ensure development does not result in the loss or fragmentation of the existing woodland copse and reinstate appropriate woodland management;" May be other copses that are not currently identified and which need to be retained.</li> </ul>
085 Cope, 349 Hirst, 769 Cole	<p>Concerns regarding land to the north of A330 at Nuptown, including:</p> <ul style="list-style-type: none"> <li>Its allocation is contrary to existing Green Belt policy that states that boundaries should be readily recognisable, and likely to be permanent. Development of this field would contribute to a general sprawl.</li> <li>Would be remote from the proposed community centre, separated by busy main road.</li> </ul>
021 Leach, 028 Manning, 085 Cope, 558 Sherrington, 769 Cole	<p>Suggested amendments to presentation/style of Concept Plan, including:</p> <ul style="list-style-type: none"> <li>Translucent style map overlaid over a base map.</li> <li>Show Jealott's Hill Farm/heritage.</li> <li>Define boundary of existing major developed site so difficult to ascertain the extent of the proposed excursion into the Green Belt.</li> <li>Make the plan clearer by adding well known features (road names, Frost Folly car park, Moss End Garden Centre, The Shepard House PH, New Leathern Bottle PH etc).</li> <li>Include changes RBWM are proposing.</li> <li>Inadequate provision made for upgrading of roads &amp; transport infrastructure &amp; urbanisation of Green Belt and is therefore misleading.</li> </ul>

068 Boyd, 076 Rothwell-Boyd, 086 Young, 093 Barnes, 095 Young, 098 Baldwin, 099 Menon, 100 Baldwin, 161 Menon, 192 Parkinson, 196 mead, 197 Parkinson, 201 Deplodge, 232 Mackenzie Dodds, 329 Woodroffe, 345 Woodroffe, 406 Whitfield, 436 Ketley, 439 Moss, 444 Moss, 479 Tillbrook, 744 Sandwell, 770 Bateman, 805 Charlwood, 822 Charlwood, 823 Jordan, 824 Noor, 825 Hodson, 834 Oxenham, 875 Noor, 877 Noor, 885 Noor, 924 Thompson, 938 Jordan, 942 Barron	No guarantees from Council that phases of development will progress outward, starting from existing Syngenta site, in order to minimise disruption and ensure Green Belt land is only destroyed when development begins and not in advance.
189 Auster	Proposals only increase Syngenta's footprint by a small percentage: approx. 9% to 15%.
<b>PLAN MAKING</b>	
422 Murphy	The proposal for the 4000 home settlement at Jealott's Hill detracts from, and overwhelms, an otherwise largely excellent Plan.
149 Elmes, 176 Stok, 178 Stok, 190 Elmes, 265 Mackenzie, 276 Street & Street, 322 Bonfante	Goes against BFC Planning Strategy of 'protect the Green Belt' to build unneeded homes and boost the share price of a Chinese owned company.
091 Rimmer	Trust that the Secretary of State will not allow the removal of the Green Belt.
441 Lawrence	Is there no authority above BFC whose permission must be sought for the repurposing of the Green Belt? The new housing seems to have been simply 'bolted onto' the already-agreed Local Strategic Plan.
001 Moore	The Plan is misleading in suggesting that Jealott's Hill is needed to deliver government target.
002 & 322 Bonfante, 151 Kingston, 167 Kingston, 176 Stok, 178 Stok, 265 Mackenzie, 276 Street & Street, 287 White, 349 Hirst, 391 MacKenzie, 769 Cole, 798 Bridges, 806 Mcalister, 811 Bridge, 812 Bridge, 814 Mcalister, 828 Strange, 829 Mcalister, 833 Mcalister, 870 Bridges	Conflict with Warfield Neighbourhood Development Plan: <ul style="list-style-type: none"> <li>• Warfield NDP supports limited infilling on the site.</li> <li>• Warfield NDP respects the Green Belt.</li> <li>• Warfield NDP supports development within settlement boundaries.</li> <li>• BFC should not be allowed to bulldoze through Warfield's thoughtfully constructed long term plan.</li> <li>• Jealott's Hill and Hayley Green are close by one another and situated such that development on both sides of Warfield would will affect traffic and the current community.</li> <li>• The Warfield NDP should not be acted upon in terms of housing until the Plan for Jealott's Hill is determined.</li> <li>• It is inappropriate and inconsistent to Warfield to adopt NDP that does not include the conclusion for the plan for Jealott's Hill.</li> <li>• Contradicts para 1.8 to 1.11 stating close cooperation.</li> </ul>
876 Blakemore, 928 Blakemore	<ul style="list-style-type: none"> <li>• Conflict with Spatial Strategy 'to maintain the identity and integrity of the smaller settlements whilst providing smaller scale development' – the proposal is not small scale.</li> <li>• Conflict with 4.13 'best use will be made of sites which are centrally located in view of their sustainable location and encouragement given to look at high density development around public transport hubs'.</li> <li>• Furthermore, it indicates that other potential mixed-use sites could be made available within the Town Centre.</li> </ul>
088 Jones, 110 Norman, 111 Norman, 137 Jones, 151 Kingston, 167 Kingston, 174 Kingston, 175 Bown, 190 Elmes, 393 Kedward, 217 Mackenzie Dodds, 261 Scutt, 267 Smith, 273 Waddington & Waddington, 276 Street & Street, 307 Brunander, 402 Glover, 794 Jones, 803 Squires, 807 Jones, 809 Jones, 815 Barlow, 835 Taylor, 841 Wallen, 902 Wallen, 923 de Roy, 934 Kedwards, 937 Silverston, 988 Bonfante	BFC rejected the site once, what has changed since then/ nothing has changed since it was rejected. Reasons included: <ul style="list-style-type: none"> <li>• Transport (what has changed in the region since then?).</li> <li>• Unjustified removal of Green Belt, harm to open nature.</li> <li>• Harm to biodiversity.</li> <li>• Unsustainable site as it previously did not include a secondary school – 4000 houses appears to be the magic number needed to support a new secondary school (yet houses not needed).</li> <li>• How it can now be judged sustainable especially as its now 4,000 house rather than 1,200 in the SHELAA submission?</li> </ul>
841 Wallen, 902 Wallen	Plan is premature as sufficient surveys and appraisals have not been done to form the justification for inclusion in the plan, especially impact on biodiversity and transport infrastructure. Failure to demonstrate a robust analysis of the site's suitability. The following require thorough appraisal: <ul style="list-style-type: none"> <li>• Wastewater facility</li> <li>• 450 tree orchard within the Jealott's Hill Community Landshare site</li> <li>• Weller's Copse and other yet unidentified copses</li> <li>• Recycling site in Weller's Copse</li> <li>• Drown Boy Pond opposite Syngenta Weller's Lane entrance (new survey required)</li> <li>• Bat survey of existing buildings etc</li> <li>• Other environmental/habitat surveys</li> </ul>
558 Sherrington	The site is outside of the Local Plan as it is strategic – strategic to whom? If the UK Government, are they contributing to local infrastructure?
558 Sherrington, 807 Jones, 809 Jones	Duty to co-operate issues: <ul style="list-style-type: none"> <li>• No cohesive and joined up infrastructure plans/must work with adjoining authorities (particularly RBWM) and government to deliver a road network suitable for greater traffic flows and safe pedestrian and cycle routes concomitant with the rate of housing delivery.</li> <li>• Large site on the edge of Bracknell – coordination needed with neighbouring authorities.</li> </ul>
748 British Horse Society	It is of utmost importance that BFC engages with the community over the design of this development. A design team or company that regularly consults with the community, holds forums where residents are listened to and considers their design ideas. This is the only way this development will be accepted by the local community. Example: Arborfield Green.
<b>Decision Making Process</b>	



139 Fitzwilliam	By insisting that this development is included in the revised Local Plan, Bracknell Forest Councillors have placed the planning team in a very invidious position of having to support a proposal that is currently unsupportable. The proposal should only have been put forward once the Developers had convinced the Planning Department that the issues of sustainability could be overcome. One is led to the conclusion both from the written documents and the verbal explanations that the proposed 4000 new homes is driven by the attraction of a new secondary school, the opportunity to optimise the provision of amenities and primarily by the desire of developers and owners to maximise the financial return on land no longer relevant to its commercial activity. Traffic planning, services infrastructure, social cohesion, environmental and biodiversity protection and other community centred issues seem to have been given little weight in the decision to include the proposal in the Local Plan.
128 Norton, 140 Tillet de Clermont-Tonnerre, 190 Elmes, 201 Depledge, 258 Poole & Banbridge, 314 Chambers 322 Bonfante, 988 Bonfante	Concerns that decision making is biased/don't represent local electorate, including: <ul style="list-style-type: none"> <li>Concerned that strategic planning decisions are being made by limited members of the Council's Executive; such decisions should be made by a full Council.</li> <li>Concerned that decision-makers are often members of Parish Councils and there is therefore a conflict of interest.</li> <li>Are members of BFC benefitting financially from this proposal?</li> <li>Whoever on the council has advanced, attempted to justify and voted through these plans ought to be ashamed of themselves. Whilst they do not represent local opinion they are ultimately answerable to your electorate.</li> <li>Surprised that Syngenta has succeeded in bribing the Council into financing their commercial interest at the expense of a large area of Green Belt land.</li> <li>Not clear why Bracknell Forest Council is so lenient as to consider the release of Green Belt where other neighbouring councils like the Royal Borough of Windsor and Maidenhead have been much more stringent in similar circumstances.</li> <li>An investigation should be carried out to find out why BFC planners are so lenient.</li> <li>BFC should hold a referendum on this huge site.</li> </ul>
322 Bonfante, 147 Bowen, 375 Stock	BFC need to listen to local residents/residents are ignored.
177 Gates, 212 Gates, 307 Brunander	Proposals go against Warfield Councillors pledge to enhance, protect and preserve Warfield environment.
108 Fernandez, 110 Norman, 111 Norman, 121 Cox, 122 Cox, 151 Kingston, 167 Kingston, 307 Brunander	Wrong for Council to surrender Green Belt land to a Chinese state-owned company. Not morally right for Council to fund a Chinese owned multinational company's expansion and regeneration and provide profits by building over Green Belt land.
927 Fitzell	Have not seen a plan with such a scale of intent with no clear articulation of the opportunities and the challenges or pros/cons, no assessment of the impact, and no assessment of the current gaps that need fixing in BFC for current residents.
091 Rimmer	Farcical and hypocritical that BFC refuse nearly 200 homes at Home Farm, Warfield (also in the Green Belt) yet support 4000 homes at Syngenta.
269 Westbury	BFC should put residents' health and wellbeing first, rather than profits of private companies.
136 Duncan	This plan to create a new town is the product of sheer greed or utter indifference.
322 Bonfante	Goal posts keep changing and policies are ignored; fears this will be similar to Blue Mountain development where covenants were ignored.
794 Jones	Staggering that the Council is accepting and endorsing this with so many accepted unknowns.
<b>Consultation issues</b>	
045 Holmes	Not enough consultation on this proposal.
794 Jones, 807 Jones, 809 Jones	BFC presented misleading information – appears to have been done on purpose. <ul style="list-style-type: none"> <li>The pie chart showing "Proportion of new homes built by parish" has 62% for Bracknell and 13% for Warfield. Add in the figures for Syngenta and Hayley Green and that becomes 45% Bracknell and 40% Warfield. Very significant message.</li> <li>The pie chart "Proportion of new homes proposed within existing settlement and in the countryside" has countryside at 37% and existing settlement at 63%. Again add in Syngenta and Hayley Green and that becomes countryside 60% and existing settlement 40%.</li> </ul>
149 Elmes, 840 Ratcliffe	BFC did not notify enough residents of the proposals, including: <ul style="list-style-type: none"> <li>BFC did not notify resident within a quarter of a mile of the development.</li> <li>BFC did not notify resident 1.2km from the site.</li> <li>Why do people have to advertise extensions but BFC have done nothing to advertise the proposal to build 4000 homes to those most effected?</li> <li>All local people should be kept informed by Council to whom they pay tax and whose interests they serve.</li> </ul>
	<i>[Refer also to comments above regarding insufficient information on transport improvements]</i>
<b>Other</b>	
927 Fitzell	Town centre redevelopment is an example of positive development, redeveloping and enhancing existing facilities.
057 Maidens Green Society	Proposals appear to be driven by ease of construction and simplicity for all concerned.
375 Stock & Stock	Concerns about Syngenta as a company: <ul style="list-style-type: none"> <li>Are there potential threats to our personal/national security, given Syngenta is owned by China?</li> <li>How much control would local/nation government have over a China State-owned company?</li> <li>Why has ChemChina chosen to conduct its chemicals development business here in the UK, when labour is far cheaper in its homeland, China?</li> <li>Could Syngenta/ChemChina become like Bayer in Leverkusen, Bracknell's twin town, in starting off as a seemingly harmless firm and ending up producing pesticides, causing massive pollution, and producing warfare gas and gas masks during wars?</li> </ul>
868 Jerome	Are the Chinese to be trusted? Will they respect the Green Belt?
650 Sparkes	Impact to horse industry: large horse population and livery business in the area.
962 Stunt	Implications to surrounding house prices; reviewing if compensation should be pursued.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
<b>PROMOTERS OF SITE</b>	

<p>667, 678, 675, 688, Barton Willmore on behalf of Syngenta</p>	<p>Support the inclusion of land at Jealott's Hill (and associated Policies Map changes in relation to amending the settlement boundary/Green Belt). Proposal would follow Garden Village principles, with provision of essential infrastructure, including increased frequency public transport services. Would provide up to 4,000 new homes (including 1,400 affordable), and other infrastructure such as provision of land for education (primary and secondary schools). Reference made to 'Core Submission Document' (accompanying representations), which has been made on behalf of Syngenta, CEG and Taylor Wimpey.</p> <p>Development would provide a mix of housing sizes and tenure (including affordable) for those working at Syngenta and those within the Science and innovation park at very life stages for 'graduates/professionals/families. Would meet the draft delivery target of 35% affordable (1,400 homes).</p> <p>To remove land from the Green Belt, NPPF clear that exceptions circumstances should be fully evidenced and justified. Points out that there is no definition of what composes exceptional circumstances within the NPPF. Council needs to reach a sound planning judgments (reference made to Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council [2015] EWHC 1078 (Admin)).</p> <p>The following Exceptional Circumstances for accommodating Syngenta in the Green Belt provided:</p> <ul style="list-style-type: none"> <li>• Global demand for food and there is an environmental and economic opportunity for companies to generate environmental benefits and generate significant returns from research</li> <li>• There will be pressure to increase the productivity of available agricultural land and therefore it is important to ensure food is produced with a greater level of efficiency and in an environmentally way.</li> <li>• Strategic/Business Need: <ul style="list-style-type: none"> <li>• International significance</li> <li>• Govt support for agri-tech sector</li> <li>• Only major commercial investor in agri crop research</li> <li>• Proposal would match Govt 'Clean Growth' agenda</li> </ul> </li> </ul> <p>Need to be at Jealott's Hill:</p> <ul style="list-style-type: none"> <li>• Only major commercial investor in crop agriculture research in the UK.</li> <li>• Internationally significant, 20% of global market share.</li> <li>• Values and ambitions match the Clean Growth agenda in Government's industry Strategy.</li> <li>• Only major global R &amp; D site for agrochemical research.</li> <li>• International recognition as major centre of excellence for agriculture. Proximity enables continued relationship with university institutes.</li> <li>• Support from Berkshire Local Industrial Strategy (BLIS) to drive the 'knowledge economy'.</li> <li>• Established site and inability to replicate existing operations on another site given specialist nature of operations</li> <li>• Existing facilities are aging and require significant investment. Relocation would be costly and disrupt research and lead to loss of knowledge</li> <li>• Investment 'at scale' is required and this will be enabled through housing</li> <li>• Job creation i.e. 2000 jobs plus related industries</li> </ul> <p>Case for new garden (live/work) community:</p> <ul style="list-style-type: none"> <li>• Development is necessary/justified outside the existing site to enable investment in the business (i.e. enabling argument);</li> <li>• The delivery of housing i.e. 1,400 affordable homes</li> <li>• Housing would attract skilled employees through the provision of affordable housing and right types and mix of housing;</li> <li>• Site would deliver social infrastructure including schools; neighbourhood centre etc;</li> <li>• It has the critical mass to improve transport links</li> <li>• It would provide publicly accessible green spaces on a site which is currently private and provide a 48HA SANG</li> </ul> <p>Consider that the site makes a limited contribution to the Green Belt (in terms of the 5 purposes of the Green Belt):</p> <ul style="list-style-type: none"> <li>• Check unrestricted sprawl of large built up areas: development of the site would not represent an outward extension of an urban area, or form a physical connection between urban areas. Releasing the site would provide the opportunity to create a strong and defensible settlement boundary, created by clearly defined physical features.</li> <li>• Prevent neighbouring towns merging into one another: would not result in the merging of towns or coalescence of settlements. Will have the opportunity to create strong defensible landscape buffers. Areas of SANG would contribute to maintain permanent area of undeveloped land between northern edge of Bracknell town and the site.</li> <li>• Assist in safeguarding the countryside from encroachment: suite is contained by obvious natural boundaries formed by tree belts lining bridleways. The landscape strategy would create a strong defensible boundary. Whilst the development would result in the loss of countryside, further encroachment would be limited to and contained by robust settlement boundaries.</li> <li>• Preserve the setting and special character of historic towns: the site is not located adjacent to any historic town.</li> <li>• Assist in urban regeneration: whilst part of the site is already developed, there is no derelict or urban land or similar scale to the site.</li> </ul> <p>Reasons provided for proposal being sustainable development:</p> <ul style="list-style-type: none"> <li>• New accommodation that would be flexible to meet changing business needs.</li> <li>• Employees would be able to live close to place of work.</li> <li>• Employees and residents have sustainable access (walk/cycle) to facilities on site i.e. high level of internal trips.</li> <li>• Those who need to travel outside can do so by bus – increase in service.</li> <li>• The scale of the development will create the opportunity to deliver a high- quality environment</li> <li>• The delivery of open space and SANG will reduce the need to travel and protect the SPA</li> <li>• The development of new R &amp; D floorspace will facilitate research into environmentally efficient food production</li> <li>• The development would use sustainable construction techniques</li> </ul>
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	<p>Comments on transport infrastructure:</p> <ul style="list-style-type: none"> <li>• Will include the direct provision of pedestrian and cycle connection from the site to Bracknell Town and Railway Station as well as other key facilities and educational establishments.</li> <li>• Various options that can be delivered within the highway have been considered i.e <ul style="list-style-type: none"> <li>◦ Shared footway/cycleway in Weller's Lane; Westhatch Lane and Osborne Lane;</li> <li>◦ Improvements to existing rights of way and footways on Forest Road and Warfield Street</li> </ul> </li> <li>• No. 53 bus route would be improved i.e., it would be re-routed through the development and provide a service of up to 4 buses/hour.</li> <li>• Internalisation of trips would reduce impact on highway network.</li> <li>• Junction improvements are likely to be required at a number of off-site junctions due to the volume of north/south traffic using key junctions on route to Bracknell Town Centre. There are no reason why proportional improvements could not be made to mitigate the impact of traffic.</li> <li>• Within site description Bowyers Lane is listed as site access, whilst access along Maidenhead Road north of Gough's Barn Lane is omitted. Proposals is to remove vehicle access to site via Bowyer's Lane. An additional access is proposed along Maidenhead Road north of Gough's Barn Lane.</li> <li>• The Strategic Transport Assessment states financial contributions will be required to the Maidenhead Road/Ascot Road junction. A review conducted by SYSTRA indicates this junction will not be significantly impacted.</li> <li>• Assessability Assessment refers to improvements to bus 53, SYSTA proposes rerouting this bus through the site and increasing frequency.</li> <li>• Sustainability Appraisal summary states that public transport, highways and other infrastructure across the site will need to be upgraded significantly. The development proposes improvements to public transport, pedestrian and cycle links as well as mitigation at a number of surrounding junctions.</li> </ul> <p>Comments on green infrastructure:</p> <ul style="list-style-type: none"> <li>• The proposed development would provide the opportunity to combine landscape elements to create a significant improvement to the character of the area that connects the areas and corridors of landscape assets that have habitat value and offer public accessibility to enable the site to accommodate the type of development proposed</li> <li>• Structural landscape would provide containment and create strong boundaries and a rational extend for the development.</li> </ul> <p>Comments on landscape:</p> <p>A Landscape and Visual Appraisal has been undertaken which is supported by a Green Infrastructure (GI) Strategy. Site has a limited contribution to the purposes of the Green Belt. Whilst the consolidation of the existing development in the central core and the introduction of additional development and landscape enhancements within the currently undeveloped agricultural areas of the site would result in the loss of agricultural land, a broad swathe of clay farmland landscape would remain. Existing trees, hedges and woodland on the site would be retained to form the basis of the landscape framework, which would be substantially enhanced, providing a setting within which to accommodate the sensitively sited proposed development and associated open space. Proposals will provide opportunity for strategic landscape enhancements and benefits, extensive open space, extensive tree planning, enhancement of existing hedgerow and restoration /enhancement of inherent landscape features such as the 'valued features' set out on the LUC Landscape Sensitivity Appraisal of the site.</p> <p>Comments on flood risk:</p> <p>The Council's level 2 SFRA identifies surface water flow across the site, areas of ponding and flooding across some access routes. As set out in the Core Document, it has been concluded that the proposed development will provide positive improvements to overland flow, with surface water being intercepted. Existing ditches will be upgraded.</p> <p>Comments on Agricultural Land Quality:</p> <p>See comments below on requirements for site.</p> <p>Comments on Minerals:</p> <p>See comments below on requirements for site.</p> <p>Comments on wording of LP7:</p> <ul style="list-style-type: none"> <li>• Reference to 1,200 homes (420 affordable) and 36,800sqm of floorscape within the plan period to 2036 (assuming completions from 2027/28) is considered excessively cautious. Timescale relates to submission of an application after Local Plan adoption in 2021, granted by 2022 enabling commencement by 2023 with first completions/occupation by 2024. Therefore, consider the policy wording should state "<b>at least</b>" 1,200 homes....</li> <li>• In relation to SANG can provide examples whether single landowner has been involved, thereby early delivery has been possible, prior to first occupation (e.g. Prince Philip Park, Bordon). The actual required provision of SANG (2ha per 1,000 population) should be quantified in the Policy to reflect the IDP.</li> <li>• In relation to 5% serviced plots, whilst supportive of provision, consider 5% is a high proportion of the development, equating to 200 dwellings. Also supported by the fact only 53 on the register (August 2019). Therefore following wording suggested:</li> <li>• "<b>Up to</b> 5% of dwellings as serviced plots for sale to custom builders <b>subject to market demand</b>"</li> <li>• Bullet 11 refers zero net carbon. However, there is no clear definition of zero net carbon. Seek clarification on the definition and application of zero or low carbon policy.</li> <li>• LP7 refers to establishment of Public Right of Way. Support the objective to protect, enhance and create new footways. However, they may not be necessary in terms of formal designation, and is a matter for the planning application stage. Therefore, suggest inclusion of works "<b>where appropriate</b>" should be included in the Policy.</li> <li>• In relation to Master Plan and design code, are supportive of the benefits as a matter of principle on major sites, however unclear why such matters are required as a prerequisite of a planning application. The applicant has the statutory right to make an application without either. Design code acts as a link between outline permission and detailed design associated with reserved matters, therefore premature and inappropriate for this to be prepared ahead of submission of a planning application. Having a masterplan framework in place will ensure that overall development delivers at a consistently high level. Council needs to be define what it intends in terms of form and details of both a masterplan and design code. Policy and para. 6.51 should be amended to clarify requirements.</li> <li>• Figure 6 – requires minor changes to extent of site boundary. Red line boundary plan provided with representation. Figure 6 does not include a new access from Maidenhead Road to serve the Science and Innovation Park. Extent of land covered by built housing appears greater than the reality on Figure 6, which doesn't take account for other non-built development assessment such as open space. Suggest the Key for the plan clarifies that the areas identified also include areas of undeveloped open space and landscaping,</li> <li>• Para 6.53 appears incomplete.</li> </ul> <p>Comments on requirements for site (Appendix 4):</p>
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	<ul style="list-style-type: none"> <li>Number of units and economic floor space within the plan period overly cautious (see comments on timetable set out under LP7, above). Should include reference to 'at least'.</li> <li>5% self build is a high proportion, and should be subject to market demand.</li> <li>SANG requirement should be quantified in the policy wording.</li> <li>Clarification needed on the definition and application of zero or low carbon policy.</li> <li>Public rights of way should be considered at the planning application stage, wording "where appropriate" should be added.</li> <li>Clarification needed in relation to requirements to submit master plan and design code.</li> <li>RPS Planning and Development has produced a Mineral Resource Assessment of the site. The site is located in a Preferred Area for extraction of sharp sand or gravel; under Policy 8 of the Minerals Plan. It is located upon safeguarded mineral resources that require consideration under draft Mineral Policy M2, but is not identified as an area for sand and gravel extracted under draft Policy M4. Available data suggests that the mineral resource may be economically unviable owing to limited resource available and potentially high processing/sorting costs associated with its development.</li> <li>Reading Agricultural Consultants Ltd (RAC as undertaken an investigation of the Agricultural Land Classification and soil resources of the site. The site contains 191.6ha of Grade 3b agricultural land quality. Therefore, the development will not result in the loss of any Best and Most Versatile Agricultural Land.</li> </ul> <p>Various comments also made on evidence base (including Housing Background Paper and Sustainability Appraisal, which are summarised under Evidence Base – Draft Local Plan Part 1, Appendix 1).</p>
656 Simmons and Sons	<p>Consider that field (forming triangle of land south of Lordland's Farm, north of Ascot Road) should be included as part of the allocation for either housing, infrastructure of leisure. (Plan provided with representation).</p> <p>(Also summarised under omission sites).</p>
141 Mines	<p>Our property is highlighted (yellow) as "part" of the "allocated area" and to lift the greenbelt. We enclose the "Land Registry" of our property proving the ownership. We do not object to the proposal in as much as we own our property.</p>
<b>PROMOTERS OF OTHER SITES</b>	
298 Bracknell Land Ltd and Tingdene Parks Ltd	<p>Proposed allocation conflicts with NPPF (2019) - para 135: There is no evidence that:</p> <ol style="list-style-type: none"> <li>BFC has examined all other reasonable options for meeting development need</li> <li>The strategy makes as much use as possible of underutilised land</li> <li>The strategy has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development.</li> </ol> <p>BFC view is that housing needs are met without Jealott's Hill 1,200 homes proposed in the period are not required.</p> <p>No justification for removing this site from the green belt, and the requirements of paragraph 135 have not been met.</p>
298 Bracknell Land Ltd and Tingdene Parks Ltd	<p>If the council wishes to plan beyond 2036, then should extend plan period to avoid pre-judging post 2036 development. 2,800 homes beyond plan period equals 4.5 yrs supply on current requirement, meaning BFC is actually planning to 2040.</p>
298 Bracknell Land Ltd and Tingdene Parks Ltd	<p>If GB release actually necessary having exhausted the options in NPPF para 135 of the NPPF, para 138 of NPPF states: <i>"Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport".</i></p> <p>There is no GB study assessing relative merits for release of GB land.</p> <p>Some of Jealott's Hill is previously developed, but vast majority is greenfield, as is part of the Hideout, which is not in GB.</p> <p>Sustainability appraisal shows Jealott's Hill site is one of worst performing sites for access to public transport and land at the Hideout performs better.</p>
298 Bracknell Land Ltd and Tingdene Parks Ltd	<p>More sites need allocating, but non-GB sites (particularly the Hideout) are better located.</p>
360 Schyde Investments Ltd.	<p>Written Statement does not make economic justification sufficiently clear or understandable. Jealott's Hill development should not duplicate the retailing elements at Moss End Garden Village.</p>
362 Schyde Investments Ltd.	<p>Company's ownership covers Garden Village at Moss End, and land on north of Bowyer's Lane which adjoins SW edge of area for new settlement.</p> <p>The component of the masterplan running towards Bowyer's Lane is described as "Area WAR3b". With reference to:</p> <ul style="list-style-type: none"> <li>The masterplan;</li> <li>The linked Housing Background Paper, 2019;</li> <li>The LUC Landscape Sensitivity Appraisal, August 2019.</li> </ul> <p>None of these documents gives any reason why Schyde land is not incorporated, despite being adjoining proposed new settlement and scope for consolidating this with existing small settlement at Bowyer's Lane.</p> <p>Landscape / sensitivity appraisals show no reason to exclude Schyde land:</p> <ul style="list-style-type: none"> <li>WAR3a, has Medium to High landscape sensitivity where area alongside the Schyde site (WAR3b) is Low to Medium sensitivity in the LUC Report.</li> <li>WAR3d, sub area has Medium to High landscape sensitivity (LUC).</li> </ul> <p>In terms of landscape merits of WAR3a and WAR3d, it makes no sense to exclude the lower landscape sensitivity Schyde land from the new settlement. Its inclusion would consolidate spatial coherence of the built-up settlement pattern and bridge the Moss End Garden Village with the Jealott's Hill development.</p>
398 The Crown Estate	<p>The Council has identified sufficient land to meet housing need to 2036 without use of Green Belt (GB) land, and therefore there is no justification for release of Green Belt land in the BFLP and no 'identified need for development' on GB land. Not clear that Council has fully examined other reasonable options before concluding exceptional circumstances exist.</p>

398 The Crown Estate	Council's GB Belt Review (2016), concluded all land in GB contributes to purposes of GB. Evidence base identifies significant constraints to development at Jealott's Hill. These include med-high landscape sensitivity, medium potential effect on heritage, safeguarding for minerals and waste, surface water flood risk, and upgrades required to infrastructure / limited local facilities.
398 The Crown Estate	Exceptional circumstances for allocation of Jealott's Hill not fully evidenced / justified, therefore the approach is unsound / contrary to para 35 of NPPF 2019.
398 The Crown Estate	'other reasonable options' for meeting development needs have not been considered, as required by para 137 of NPPF 2019, e.g. securing investment at Syngenta by alternative means or considering sustainable non-Green Belt sites such as Bracknell East to meet future development needs.
565 Turley on behalf of Berkeley Strategic Land Ltd	<p>Not aware of any viability evidence which demonstrates 4,000 houses are needed to deliver improvements. This is essential to ensure soundness of allocation, the quantum and justification for consideration of reasonable alternatives.</p> <ul style="list-style-type: none"> <li>No trigger points for implemented Syngenta investment works. Prudent that they proceed ahead of housing development to ensure that the test of the exceptional circumstances are met.</li> </ul> <p>Significant infrastructure works are required including improvements to junctions including Maidenhead Road (A3095)/Ascot Road (A330) and Three Legged Cross which are to be determined at planning application stage. Should be determined through plan making process.</p> <p>As site delivery extends into next plan period likely to predetermine the next Local Plan (notes Hart District Local Plan Inspector's recent conclusions at Winchfield, resulting in that site being removed from the Plan).</p> <p>Delivery unlikely to start in 2027/28 (report Start to Finish (NLP, 2016) average planning approval period of schemes of 2,000+ dwellings was 7 years to the completion of the first dwelling). Believe sites will not commence until 2028/29.</p>
566 Nexus Planning on behalf of Kingacre Estates	<p>The Council's Review of the Green Belt concludes that all Green Belt land within Bracknell Forest contributes in one way or another towards the Green Belt purposes. Object to proposed allocation on the basis that 'enabling development' is unjustified as the exceptional circumstances for releasing land from the Green Belt do not exist, and the site is not required to meet housing needs. This is unreasonable and unsound.</p> <ul style="list-style-type: none"> <li>Syngenta is private commercial enterprise a subsidiary of ChemChina a Chinese state owned company. The Syngenta Financial Report (provided as a document with representations indicates a net income of \$1,438 million. As with any other private business in the UK, if it needs to invest in a site, it should do so privately. It is unnecessary, inappropriate and potentially unlawful for the Council to release land from the Green Belt to enable a private company to pay for investment on a private site.</li> <li>The Council has failed to provide evidence to demonstrate the existing site is unviable in its current form. No information on cost of the proposed development at the site, nor an estimate of net profit derived from the proposed 4,000 dwellings, employment floorspace and other elements of the scheme are provided. It would seem certain that the profit from the development of the scale proposed would be far in excess of that required to refurbish and redevelop the existing site. To be accepted as enabling development, the profit yielded should be no more than required to find redevelopment, and benefits should be weighed against harm. Also, there cannot be a guarantee that if the scheme were approved, that Syngenta would remain active on the site in the long-term.</li> <li>It is clear that housing from the site is not required to meet local housing needs.</li> <li>Exceptional circumstances do not exist.</li> <li>In order to meet housing requirements appropriate, the Council should first look at brownfield sites in the urban area, followed by previously developed sites in sustainable locations outside of settlement boundaries such as Forest Farm (see separate summarised comments under 'non-allocated sites' for comments relating to Forest Farm).</li> </ul>
572 Warfield Park Homes - Woolf Bond, 591 JPP Land - Woolf Bond, 698 JPP Land (White Gates) - Woolf Bond	<p>Object to allocation as better alternatives exist and exceptional circumstances are not present:</p> <ul style="list-style-type: none"> <li>a shortage of housing land supply can amount to exceptional circumstances, but here there are clear opportunities to deliver the necessary growth without resorting to the Borough's Green Belt.</li> <li>The employment need of the Borough can likewise be met without the need for land releases from the Green Belt as indicated by the Employment Needs Study.</li> <li>The study does not indicate the need for a Science and Innovation Park, with one being delivered in the vicinity of M4 J11.</li> </ul> <p>As the Joint Green Belt Review has not been updated, there remains no clear assessment of the nature and harm to the Green Belt which would arise through this proposal. There is also no evidence of how impact associated with the removal of the site can be ameliorated or reduced to its lowest reasonably practicable extent. This Joint Review did not consider that the parcels relating to the draft allocation at Jealott's Hill should be removed from the designation. In addition, the Council's own Review confirms that the site contributes towards strong Green Belt purposes.</p> <p>Whilst Green Belt amendments are a matter of planning judgement, the Council cannot therefore make such a judgement as this would be not consistent with their statutory duty (section 39(2)) and the revised NPPF.</p>
591 JPP Land - Woolf Bond, 698 JPP Land (White Gates) - Woolf Bond	The Sustainability Appraisal acknowledges the lack of housing or employment need to release land from the Green Belt, yet it assumes the draft proposal is acceptable. This is a flawed assessment; it is comparable to that of the Vale of White Horse who had a similar proposal to for removing land from the Green Belt to meet both current and longer-term development needs. The Inspector found that the alteration to the Green Belt was not justified given the lack of satisfactory evidence supporting the proposals.
623 BRP	Whilst support inclusion of Local Centre consider there's a need to specify maximum quantum of floorspace so that the scale of retail provision is commensurate with local needs to prevent risk of main foodstore being delivered and potentially drawing trade away from the town centre
634 St William	The Council should seek to maximise potential of remaining SALP sites before considering Green Belt land. Refers to para 137 of the NPPF.

655 Spitfire Homes	<p>Site is within the Green Belt.</p> <p>BFC are relying on 1,200 of the 4,000 homes being delivered within this plan period (by 2036).</p> <p>Lack of existing infrastructure - there is a need to provide significant infrastructure to deliver such an allocation. This includes 4 schools, a bespoke SANG, Community Facilities, a Healthcare facility, employment space and highways infrastructure to mitigate 4,000 homes. This level of infrastructure will be costly and may require additional funding sources, rather than CIL and S106 contributions.</p> <p>Insufficient evidence to demonstrate that the infrastructure will be delivered early enough to allow all anticipated 1,200 homes to be brought forwards by 2036.</p> <p>Figures assumed by BFC would mean that 200 dwellings would need to be delivered each year to achieve 1,200 dwellings by the end of the plan period. Developers on average deliver c. 50 dwellings per year per site. 200 per year would mean that 4 developers would need to be involved. Multiple developers delivering at one time leads to either multiple applications (which require a significant resource to manage) or a consortium approach, which can often be delayed as a result of conflicting processes and standards. Strategic developments of this scale are likely to deliver much later in the plan period than is generally anticipated.</p>
656 Lightwood Strategic	<p>Establishment of a new settlement in the absence of evidence of need is highly controversial.</p> <p>Note exceptional need is based on enabling funding that this would provided for investment in Syngenta. Consider that evidence is needed that Syngenta (a multi-national company cannot borrow to invest like other companies. ChemChina is also 100% Chinese state owned, and in 2018 was ranked 167<sup>th</sup> out of 500 companies. Whilst no doubt that they would prefer to make use of capital assets 9land), there is no exceptional reason why the Green Belt needs to be utilised for enabling development.</p> <p>The proposed allocation is also not accompanied by background evidence such as viability and highways.</p> <p>Consultation at this stage in ineffective regarding matters than exceptional circumstances.</p> <p>Under key evidence only the NPPF and SHELAA are listed.</p>
781 W J Channing & Sons; Minstead Ltd and Markfield Ltd – Boyer Ltd	<p>There is not sufficient evidence that infrastructure will be delivered early enough to allow all anticipated 1,200 homes to be brought forwards by 2036.</p> <p>Figures assumed by BFC would mean 200 dwellings would need to be delivered each year to achieve 1,200 dwellings during the plan period. Developers on average deliver c. 50 dwellings per year per site. Alternative would thus be to have 4 developing building out at all times, but this would lead to multiple applications requiring significant resources to manage, or a consortium approach likely leading to delays due to conflicting processes and standards. Thus homes likely to be delivered later than expected, meaning sufficient sites to deliver homes required.</p> <p>WINK30 is a good alternative site to Jealott's Hill – can deliver housing in the short term, is in a sustainable location and should be released from Green Belt given exceptional circumstances given Bracknell Forest's housing need.</p>
887 Bloor Homes - Boyer	<p>Issues with BFC relying on 1,200 homes being delivered during the plan period:</p> <ul style="list-style-type: none"> <li>• The significant infrastructure required will be costly to deliver and may require additional funding sources (instead of just S106 and CIL contributions).</li> <li>• No sufficient evidence that the required infrastructure can be delivered early enough for the 1,200 homes by 2036.</li> <li>• Timescale for delivery of Jealott's Hill is overly ambitious. Developers on average deliver c. 50 dwellings per year per site, so to achieve timescales for Jealott's Hill 4 developers would need to be building out at all times. This would require multiple applications and significant resource to manage, or a consortium approach, often delayed due to conflicting processes and standards. Delivery rates would also naturally slow down, given the high number of units delivered in a short period impacting sales and viability. Also, strategic sites are generally delivered later in the plan period than anticipated.</li> </ul>
892 Persimmon/Souter	<p>Major departure from Green Belt Policy –the existing built up campus only covers 25ha whilst the proposal would spread across 240ha. Economic justification is not clear or understandable. The Council should not sanction a so-called "enabling development" without an environmental justification (derelict land, etc) or boost to local job opportunities (Bracknell has one of the most successful economies in the South East).</p> <p>In the absence of any reasoned justification there is land that is better related to Bracknell town e.g. WAR4 and WAR5.</p>
<b>OTHER ORGANISATIONS WITH RELATED INTERESTS</b>	
Collaborators with Syngenta: 049 Rothamsted Research, 052 University of Oxford, 078 CBRE, 118 MoA Technology, 126 Imperial College London, 330 BT Group, 908 Activate Learning (B&W College)	Strongly support plans. Seek further collaborations (includes examples of possible collaboration methods).
049 Rothamsted Research, 126 Imperial College London	Plans provide a strong signal to the UK government of the continued commitment of Syngenta to play a leading role in the transformation of UK agriculture.
052 University of Oxford, 126 Imperial College London	Jealott's Hill is currently the only major commercial R&D centre for agrochemical and agricultural technology research and already plays a vital role in UK research, UK scientific and regional economies.
052 University of Oxford	Proposed expansion/redevelopment would ensure long term sustainability and global competitiveness of UK agriculture.
078 CBRE	Proposals will bring many benefits to the local community, including new local career openings through supply partners delivering a multitude of services (gives examples)
078 CBRE	R&D campus sites and workplace environment play important role in retaining best talent and attracting future generations of scientific expertise.
078 CBRE	Proposals give CBRE unique opportunity to be involved in project involving latest building technology, industry leading laboratory and workplace design, providing advanced training and development opportunities for workforce. Will enhance employees' careers.

078 CBRE	Proposals will represent advancement to agrochemical industry and local environment.
118 MoA Technology	MoA Technology is a biotechnology business carrying out crop protection R&D that is potentially interested in moving from their current incubator facility to planned development at the site.
118 MoA Technology	In the near term Jealott's Hill science park would be an attractive location due to the components on offer including: office, laboratories, greenhouses, analytical devices and broader supporting services/expertise.
118 MoA Technology	Staff will find the site amenities, including restaurant, gym and recreation club, attractive.
118 MoA Technology	Over the long term the planned science and innovation park would be a vehicle with the flexibility and capacity to support future growth plans
118 MoA Technology	The plans are exciting, looks forward to future dialogue with Syngenta.
219 Skyx Solutions	Plans will help Skyx, an early-stage AgTech company, to: <ul style="list-style-type: none"> <li>engage with other companies – extremely valuable as it is challenging to do so</li> <li>Develop innovation on a farm.</li> </ul>
255 FungiAlert	Jealott's Hill is an internationally important site, with a global reputation for excellent science and innovation. Continued investment critical to: <ul style="list-style-type: none"> <li>ensure sustainable agricultural practices can be found</li> <li>continue to safeguard soil health</li> <li>benefit wider agricultural sector.</li> </ul>
255 FungiAlert	A larger Science and Innovation Park would: <ul style="list-style-type: none"> <li>Provide greater collaboration opportunities with the industry and across industries</li> <li>Catapult innovation within the agricultural sector which it'll be exciting to be a part of</li> <li>Bring in further investment to the agricultural sector</li> <li>Provide facilities that would be valuable to start-ups</li> <li>Cluster science businesses together around themes</li> <li>Encourage skill-sharing</li> <li>Provide education and employment opportunities, giving a positive impact across many sectors (students to local businesses).</li> </ul>
330 BT Group, London & South East	Writing in support of proposal to develop site at Jealott's Hill, Warfield. Development aligns with BT's mission to promote digital skills, and Science, Technology, Engineering and Maths (STEM) in the UK and to serve local communities. BT employs more than 80,000 people across UK and almost 1,000 in Berks, many of whom come from STEM backgrounds. These employees contribute towards a total GVA of £1.3bn in the county. Have been a strategic IT partner to Syngenta for 19 years and currently upgrading site's wireless comms to enable greater collaborative working & new data gathering methods for scientists and researchers. The proposals constitute an exciting opportunity for the local area and wider UK economy. The UK has highest share of GDP generated by the digital economy in the G20, yet face an alarming digital skills gap. This risks widening social divides and has an estimated £63bn annual impact on the UK's competitiveness. Initiatives like the development plan for the Syngenta site can play an important part in addressing this challenge, while also investing in Bracknell Forest and helping UK to take advantage of possibilities in an increasingly connected world.
379 Blue Frog Scientific Ltd	There are benefits of the proposals: <ul style="list-style-type: none"> <li>Support work at Jealott's Hill - research and development of technology which can sustain the need to produce food for the world's population</li> <li>Support growth and innovation in UK chemicals and research sectors</li> <li>Provide state of the art research facilities for agri-tech, life sciences, environmental management, clean energy, digital and materials science</li> <li>Protect and create highly skilled UK jobs</li> </ul>
392 Scymaris (Stephen Derrington)	Scymaris is an environmental laboratory business providing scientific support and laboratory based testing services to global agrochemical, pharmaceutical and chemical companies to assist them with their Research, Development and Regulatory Product Management needs. Believe the creation of a Science and Innovation Park at Jealott's Hill presents exciting opportunity to build, and potentially cluster, related scientific activities and companies. The Park would not only provide close proximity to Syngenta, a world leading agrochemical company, but also foster and support innovation, best practices and leading edge science to help sustain the UK's position as a global leader in the life sciences sector. Jealott's Hill also provides an excellent location in SE UK with good road, rail and airport connectivity. The inclusion of affordable housing would be a very positive factor in attracting and retaining skilled scientists and related staff. Hope that BFC supports this important scheme and interested to learn more about the potential for the Science Park to provide an additional base of operations for Scymaris
460 McManus	Support Syngenta's plan to develop land around the Jealott's Hill site. Concept Life Sciences provide services for companies developing science based products, much of our major market is UK based research companies. Last decade has seen significant change and largely reduction in the UK market as major sites have closed or been significantly impacted by relocation of research capability out of the UK. To see any major development maintaining and bringing high quality science jobs to the UK through provision of additional research capacity and new incubator and accelerator space can only be good for that local area and the UK science base overall. This should support the ability to attract new entrepreneurial start-ups and to attract companies from across the UK looking to grow and be co located with companies in related industries and talent pools for employment.  Collocated housing will assist to support a major new research site to attract the talent needed by providing sustainable development in area with limited availability and high cost housing.  Syngenta as a major global company through their business to focused on improving the production capacity of the global farming industry, by continuing to develop new products that are safer and more environmentally friendly, help address the issues of feeding a growing population. This business provides high quality science and technology driven employment opportunities. Supporting development of their local research capability in the UK will see growth of these important roles in the UK rather than options in other territories.

564 City Farms Systems	<p>Historical importance, was once ICI facility, now a major part of international business. Company operates in same sector as Syngenta, considers Thames Valley should be doing more to support early part of the food chain. ICI was important to agrochemicals, and work has been continued by Syngenta with a larger global resources and knowledge base.</p> <p>Proposed facilities at Jealott's Hill offer an attractive location for agricultural related businesses. An internationally recognised location with good transport links and accommodation for workers/visitors makes good business sense.</p> <p>City Farm works (such as automated greenhouses on roofs) can help with carbon reduction – welcome the opportunity to work with Bracknell Forest and Syngenta to showcase how a community can lead the way in how a smart city can reduce carbon footprint.</p>
742 University of Nottingham	<p>Fully support the proposal for a new Science and Innovation Park at Jealott's Hill as:</p> <ul style="list-style-type: none"> <li>• Have a successful partnership with Syngenta delivering Young Entrepreneurs Scheme (YES) for 9 years hosted at Jealott's Hill. This competition offers postgraduate students and early career researchers from diverse backgrounds a practical insight into how to commercialise research and recognise the benefits of industrial collaboration, assisting their career development. Thus, it is a valuable opportunity for students. The project has been successful due to genuine partnerships with academia, government and industry.</li> <li>• It is critical that we continue to invest in agricultural technology and related sectors in the UK to retain our pre-eminence in research led innovation given how they attract our leading early career researchers to work in this area (addressing challenges faced by farmers).</li> <li>• Through the hosting of YES we have seen directly the positive impact of clustering science businesses together and how the new proposed facilities will be hugely beneficial to a wide range of businesses of different scales.</li> <li>• The co-location of businesses will also increase the chances of successfully bringing innovations to market and growing businesses as witnessed at the Ingenuity Lab.</li> </ul>
773 Thames Valley Berkshire LEP	<p>Support potential re-investment in Syngenta. Proposal align with emerging Berkshire Local Industrial Strategy (BLIS) as it strengthens the role of an anchor institution to:</p> <ul style="list-style-type: none"> <li>• support commercialisation of knowledge.</li> <li>• build productive links between SMEs and major players across Berkshire.</li> <li>• act as a catalyst for encouraging even greater investment in R&amp;D.</li> <li>• address the "hollowing out" of higher value/higher knowledge content functions in Berkshire (with some companies operating administrative functions in Berkshire and undertaking their R&amp;D elsewhere), by providing a sector-specific Innovation Space, providing incubator and accelerator space for entrepreneurial start-ups and modern flexible workspace</li> <li>• build vibrant places and a supportive infrastructure, accelerating a shift to more sustainable transport modes and promoting the sub-region to international audiences</li> <li>• deliver a critical mass of expertise and facilities to foster collaboration across agri-tech, life sciences, environmental management, clean energy, digital and materials science, resulting in exportable products and technologies. This would support the BLIS priority to encourage international trade, collaborations and investments through the implementation of sector deals for AI and Life Sciences.</li> </ul>
773 Thames Valley Berkshire LEP	<p>Plans for a garden village of some 4,000 homes, 35% of which will be affordable, correlates strongly with the aspirations set out in our emerging BLIS, as housing pressures are substantial and for economic potential to be realised housing numbers set out in emerging plans must be realised. This will make Berkshire an inclusive area where aspirations can be realised.</p>
773 Thames Valley Berkshire LEP	<p>Retention and creation of skilled jobs is supported, as Berkshire growth needs to not just be about quantity but also quality and output. Financial projections for the site highlight the development's significance to local economy.</p>
773 Thames Valley Berkshire LEP	<p>Proposals support Government's Clean Growth Agenda in a number of ways. A focus on the Clean Growth Industrial Strategy Grand Challenge will ensure that economic growth contributes positively to Berkshire's environmental performance, responding to the climate crisis.</p>
773 Thames Valley Berkshire LEP	<p>Support the proposed schools and additional linkages that could bring to Syngenta scientists providing exciting education opportunities for a STEM focus, increasing the supply of people with higher-level skills to sustain productivity levels and attraction/retention of leading international firms post-Brexit. Would support the LEP's STEAM strategy.</p>
827 Thames Valley Chamber of Commerce	<p>Support the proposals to retain and grow facilities at Jealott's Hill as an international and significant R&amp;D facility in the sub-region because:</p> <ul style="list-style-type: none"> <li>• The facility is of significant economic importance for Bracknell, Thames Valley and UK: <ul style="list-style-type: none"> <li>○ Its retention and capacity to grow will help retain 850 jobs, create 2,000 new jobs.</li> <li>○ It will help deliver more than £50m in business rates and between £6.4 - £7.1 billion in GVA over the 20 years following completion</li> </ul> </li> <li>• Proposals would support the Government's Industrial Strategy proposals and Thames Valley Berkshire Local Industrial Strategy (LIS) aims.</li> <li>• Research at Jealott's Hill is world leading and is developing future technology to feed a growing population efficiently and in an environmentally friendly way</li> <li>• The mixed use development will provide opportunity to maximise wider benefit for community and wider area, including: <ul style="list-style-type: none"> <li>○ New schools providing educational opportunities linking Syngenta scientists in driving STEM projects.</li> <li>○ Additional housing including affordable</li> <li>○ Extensive, new and accessible green spaces</li> <li>○ Opportunity to explore innovative technologies and future proof design(s) to provide exemplar environmentally friendly development, with reduced energy and water consumption and carbon given scale of the development</li> </ul> </li> <li>• Will help deliver many of our Business Manifesto's aims and objectives, including business-led approach to deliver sustained economic growth, infrastructure investment and resilience in Thames Valley.</li> </ul>
837 Drone Ag Limited	<p>Syngenta's support and expertise is a huge benefit to what we and other small UK start-ups are trying to achieve and look forward to further collaboration if proposals go ahead.</p> <p>Jealott's Hill has excellent track record for R&amp;D in agritech sector, with large impacts on UK and worldwide. UK is becoming an agritech world leader. Agritech is extremely important in seeking to feed the world sustainably. Continued investment in UK agritech companies/R&amp;D facilities will ensure UK remains world leader in field.</p> <p>Proposals are therefore exciting news, especially Science and Innovation Park. Will create great location for collaboration and innovation between UK companies like ours, Syngenta and others. Collaboration the only way to solve some issues facing agriculture, hence we are creating innovation centre in the North.</p>

908 Activate Learning (B&W College)	<p>Syngenta works with Activate learning in many ways including:</p> <ul style="list-style-type: none"> <li>• Student science project-based learning, enhancing learning experiences and providing a route into work, apprenticeships and further study at Jealotts Hill.</li> <li>• Member of advisory board that shapes education to ensure there is a pipeline of talent for local businesses.</li> <li>• Supporting new initiatives and development, such as the development of a new science lab.</li> </ul>
908 Activate Learning (B&W College)	<p>Proposals would grow the number of science roles to the benefit of the local economy and students at Activate colleges. Syngenta has a key part to play in this, and are engaged with all levels of education in the area as well as the community, inspiring young people to have science-based careers with prospects. Concerned about the impact on students if Syngenta had to move elsewhere to deliver a project such as this.</p>
908 Activate Learning (B&W College)	<p>Proposals would allow the far-reaching work the business to expand:</p> <ul style="list-style-type: none"> <li>• Impact the development of local young people and adults than is currently possible through new relationships with other employers at the new Science and Innovation Park.</li> <li>• Greater potential for work experiences, industry placements and university graduate placements.</li> <li>• Opportunity to expand volume of apprenticeships and on-site vocational training/skills development.</li> <li>• Creation of additional career routes not currently offered on-site, in secots such as construction and wider STEM sectors.</li> <li>• Raising career aspirations for Berkshire students.</li> </ul>
908 Activate Learning (B&W College)	<p>Proposed development is a key component for the future economy and community of the area.</p>



## 6.6 Forms of residential accommodation

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
517 Binfield Parish Council	Accommodation for older people should include bungalows and single story housing. Lifts must be considered in higher rise buildings.
517 Binfield Parish Council	Social housing should be mixed with privately own housing.  A larger percentage of 2 and 3 bedroom homes in Binfield should be considered.  All developments should be suited to the surrounding area, reflecting design characteristics, density and open space.
533 Warfield Parish Council	Supportive of additional accommodation for older people and care homes. Siting of homes is important in relation to good access to other facilities,. And sufficient parking for visitors and staff.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
<b>DEVELOPERS / PROMOTERS OF SITES</b>	No Comments received
	No Comments received
<b>PROMOTERS OF SITE</b>	
	No Comments received
<b>PROMOTERS OF OTHER SITES</b>	
728 Landsec	Council needs to consider all forms of housing such as those with the potential to grow in future - build to rent, co-living, modular housing and alternative methods of construction. Need for flexible policies due to changing markets and technological demands
506 Hawksbury Homes	Section 6.6: Forms of Residential Accommodation A policy should be included that supports the delivery of specific forms of residential accommodation including older people. Specific sites providing C2 accommodation should be allocated within the Plan.



## 6.7 Affordable housing (LP8)

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
517 Binfield Parish Council	Provision of affordable housing needs to be stated in planning permissions, and not be diluted by viability, and should be tied to legal agreements.
534 Warfield Parish Council	Recognises the definition of affordable housing is broad and that 'affordable' housing in many cases is neither affordable or available to local housing need. The PC would like to: i) see a diverse mix of tenure types on sites to allow sustainable communities to develop; ii) the deletion of the section in policy LP8 covering exceptional circumstances in point iv)
317 Bracknell Town Council	Policy supported
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
HBF	Council must not seek to secure contributions at a level that could make viability of development marginal. The viability evidence published by BFC was produced in 2017 prior to publication of the latest NPPF and supporting guidance - evidence needs updating.  HBF has the following recommendations with regard to the approach and the costs it applies: <ul style="list-style-type: none"> <li>• <i>Build costs.</i> The costs in the current viability evidence will need to be updated to take account of an inflation.</li> <li>• <i>Fees.</i> It is important that a cautious approach is taken with regard to fees. For example, professional fees on larger and more complex sites can be up to 20% of build costs.</li> <li>• <i>Developer profit.</i> The Council proposes 18% on GDV for market housing and 6% on affordable. PPG advises that profit should be 15% to 20% on total GDV for a development and the Councils approach will see profits at around 15%. We would suggest that this is too low given the inherent risks of developing in the current market and the Council should increase the profit on the market proportion of any scheme to a minimum of 20%.</li> <li>• <i>Abnormals.</i> The assessment suggests that any abnormal costs are likely to be reflected in current BCIS figures. However, the BCIS costs reflect the cost of building a unit and will not include abnormal infrastructure costs are all those costs over and above the standard costs outlined above that are required in order to deal with site specific conditions and meeting all planning and technical requirements. If these are significantly higher than expected then the reduction in land value may not be sufficient to incentivise the sale of that land. As we set out in our viability guide there are a huge range of abnormal costs to be accounted for and the Council should engage with housebuilders in Bracknell Forest to consider the amount of abnormal costs, they have faced in bringing sites forward. Evidence submitted by the HBF to the County Durham Local Plan showed that evidence from 14 sites the average level of abnormal costs for a Greenfield site was £495,000 per hectare and £711,000 per hectare for brownfield sites. Whilst we appreciate that these costs will vary between areas it provides an indication that these costs can be substantial and should be considered in more detail; and</li> <li>• <i>Other policy costs.</i> The assessment will need to be updated to reflect the policy costs being introduced in the local plan including the open space standards in LP14. In addition, the Council should include an assessment as to the impact on viability of achieving the biodiversity gains that the Government are proposing to introduce as these could have a significant impact. The published alongside its response to the consultation<sup>1</sup> indicates that it will cost an average of around £20,000 per hectare to achieve a 10% net gain in biodiversity through a 75:25 split between onsite mitigation and offsite contributions. However, the study also recognises that should higher levels of off-site contribution be required the costs will increase substantially. Elsewhere research by Savills<sup>2</sup> for example, suggests that the costs of meeting bio-diversity gain could be substantially more at between £9,000 and £15,000 per dwelling.</li> </ul>
048 Holland	The Council should learn from the RIBA awarding winning development for social housing at Goldsmith Street, Norwich and develop something similar in Bracknell to alleviate the waiting list rather than relying on private developments.
286 White	The growth Strategy should be explicit about what 'Affordable Housing' means. Housing that is a certain percentage cheaper to buy or rent than other housing in the area does not mean that it is affordable, just less expensive. Any proposals should make it clear that developments must make provision for housing that is truly affordable to those in need of housing in the area.
423 Murphy	Supports: i) 35% affordable homes but hope that BFC is focussed on allocating sites where this is deliverable, and prices/rents are most likely to be truly affordable; ii) Policy LP8 Concerned that the viability assessment and exceptional circumstances for provision of affordable housing i.e. whether quantum or on/off site would give developers 'wriggle room' given that a large proportion of homes in this plan period will be built out on countryside/greenfield sites, including SA allocations, which are expensive locations. Site selection for this Plan should factor in whether 35% affordable homes are likely to be built at proposed allocations, and whether they are realistically affordable. This should also be an important consideration for planning applications.
491 S Collings, 609 M Collings	Supports policy LP8 Affordable Housing if it is genuinely affordable
290 Miller	Supports provision of affordable housing; resist all attempts to avoid its provision. Viability reports should be carefully analysed. Use clauses to ensure transparent monitoring and any subsequent changes result in financial compensation to fund development of social housing in the borough.
740 Richardson	Policy LP8: Need definition of affordable housing. Need for more housing that is affordable requires research.
910 R Wallen, 849 C Wallen	Most house builders don't want to build affordable housing. Needs to include attractive family homes with easy and safe access to outdoor space.  Para 6.65: reference to exceptional circumstances and 'affordable homes being provided on an alternative site'. Should state provided on an <b>identified</b> alternative site.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
749 HBF	Paragraph 2a-024 of Planning Practice Guidance states that an increase in the total housing figure may be required where it could help deliver the required number of affordable homes. The Council state it would have to deliver 227 affordable homes (each year to meet needs. Scale of proposed allocations suggest that the Council will fall short of this requirement. Council needs to increase the overall housing requirement in order to meet the need for affordable homes in BFC.
749 HBF	Detailed Comments are made in respect of the Viability Study (both timing and content ) which are recorded in the General responses.

570 Woolf Bond Planning on behalf of Warfield Park Homes, 590 Woolf Bond Planning on behalf of JPP Land Ltd, 696 Woolf Bond Planning on behalf of JPP Land Ltd	<p>Objects to the increase in the level of affordable housing from the current 25% to 35% on the grounds that:</p> <ul style="list-style-type: none"> <li>i) there is no robust evidence that this can viably be achieved since the Council's own viability assessment to support the Local Plan (prepared by BNP Paribas in July 2017) states (para. 5.10) that achieving 35% affordable housing is only feasible in the longer term, assuming property values increase above £3,500 sq.m. Table 3.4.1 of the Viability Assessment indicates that this is above the average in Bracknell Town.</li> <li>ii) the approach to assessing viability is flawed since it ignores potential increases in build costs (materials and/or labour) which will negate any increase in value;</li> <li>iii) there is no evidence that 35% affordable housing is viable within the Bracknell Forest Borough and consequently, no more than 25% affordable units should be sought by the policy.</li> </ul> <p>The Local Plan will fail the soundness text of this policy is included in a submission Local Plan.</p>
693 Syngenta	<p>Support the policy. Consider the provision of 4,000 homes on Jealott's Hill will increase supply and in turn improve affordability.</p> <p>In order to retain affordability at current levels in forecasts, it will be necessary to provide for c. 700 additional dpa.</p> <p>The majority of employees on site will require market housing but graduates and young professionals will need affordable homes.</p> <p>Application of 2011 Census data to the profile of existing Syngenta employees identifies the need for 85% market and 15% affordable housing.</p> <p>Trajectory for delivery of Jealott's Hill proposal is excessively cautious. Policy should state 'at least' 1,200 homes and 36,800 sqm of floorspace in the Plan period.</p>
720 Escrillion	<p>Must be seen within the context of relevant site circumstances, including their size, location and the economics of provision. As a minimum, the viability of schemes must be acknowledged. LP8 must be sufficiently flexible to recognise instances where sites may not be able to deliver and achieve the 35% threshold (or even a lesser sum, if any provision at all). As such, the "exceptional circumstances" referenced within the policy wording and supporting text must be expanded to include viability and individual-site circumstances such as physical constraints.</p>
Landsec	<p>Affordable housing should be provided as part of any mixed community.</p> <p>Housing should be assessed in line with policy requirements on a case by case basis. Flexibility needed within policy to reflect the ever-evolving changes in the market e.g. new housing tenures such as Build to Rent/Private Rental Sector/Multifamily, Co-Living etc.</p>
757 S2 Bracknell Ltd	<p>Supportive of delivery of affordable housing, but object to policy as consider it to be overly prescriptive and should go further in allowing flexibility. Should reflect viability, and 35% should be reviewed on a case by case basis. Therefore, suggest rewording as follows:</p> <p>"To secure a mix of housing types and tenures, the Council will require (<u>subject to viability</u>):</p> <ul style="list-style-type: none"> <li>i. affordable housing to be provided on sites of 10 dwellings (gross) or more or which have an area of 0.5 hectares or more;</li> <li>ii. <u>Target of 35% net new homes to be affordable</u>;</li> <li>iii. the provision of affordable housing products that meet local housing need and affordability; and,</li> <li>iv. affordable housing to be provided on site unless it can be demonstrated that exceptional circumstances exist to justify off-site provision or a financial contribution." </li></ul>
711 Gladman	<p>It is vital that the full costs associated with the delivery of policy compliant affordable housing, together with all other policy requirements within the local plan are taken fully into account through the Plan's evidence base in due course.</p> <p>Consideration should also be given to whether the tenure split proposed within paragraph 6.67 of the supporting text is a statement of policy and instead include such requirements within the wording of Policy LP 8.</p>
888 Bloor Homes	<p>Notes that Draft Policy LP8 states that affordable housing will be provided on site unless exceptional circumstances exist to justify off-site provision or a financial contribution. There is no wording to deal with a situation where the delivery of affordable housing would render the scheme unviable. The accompanying text refers to viability but the Draft Policy should be amended to read 'affordable housing to be provided subject to viability considerations'.</p>

<p>776 Boyer on behalf of W J Channing and Sons (Woking) Ltd Minstead Ltd and Markfield Ltd, 888 Bloor, 967 Jordon Construction, 978 Wellington College</p>	<p>Notes that Draft Policy LP8 states that affordable housing will be provided on site unless exceptional circumstances exist to justify off-site provision or a financial contribution. There is no wording to deal with a situation where the delivery of affordable housing would render the scheme unviable. It is noted that the policy does provide for on-site provision of affordable housing unless 'it can be demonstrated that exceptional circumstances exist to justify off – site provision or a financial contribution'. This flexibility is welcomed but there are concerns regarding the impact that the proposed affordable housing requirement (35%) could have on development viability. BFC's Viability Assessment (2017) shows in a number of scenarios the 35% affordable housing requirement will make the development unviable or push it to the margins of viability in lower value areas.</p> <p>BFC should look to reduce its affordable housing requirement to help improve affordability and to better support deliverability of the proposed scale of development across Bracknell Forest or at least amend the wording of draft Policy LP8 to include reference to viability as follows (NB different wording provided in the representations from Boyer):</p> <p><i>i. affordable housing to be provided <b>subject to viability considerations</b> on sites of 10 dwellings (gross) or more or which have an area of 0.5 hectare or more.</i></p> <p>and</p> <p><i>"i. affordable housing to be provided on sites of 10 dwellings (gross) or more or which have an area of 0.5 hectares or more <b>unless it is unviable...</b>"</i></p>
<p>655 Spitfire Bespoke Homes Ltd</p>	<p>Flexible mechanisms included in policy welcomed, but concerns remain regarding the impact that the requirement (35%) could potentially have on development viability.</p> <p>Specific comments are made in respect of the BFC viability assessment. These are recorded in the General Comments in respect of the plan.</p> <p>However, as part of the response reference is made to the PPG (Paragraph: 002; Reference ID: 10-002-20190509) which confirms that:</p> <p>"...It is the responsibility of plan makers in collaboration with the local community, developers and other stakeholders, to create realistic, deliverable policies...."</p> <p>Draft Policy LP8 states that affordable housing will be provided on site unless exceptional circumstances exist to justify off-site provision or a financial contribution. There is no wording to deal with a situation where the delivery of affordable housing would render the scheme unviable.</p> <p>It is noted that the accompanying text refers to viability, Draft Policy LP8 should be amended to include reference to viability:  <i>"affordable housing to be provided <b>subject to viability considerations...</b>"</i>  <i>Draft</i></p>
<p>565 Turley on behalf of Berkley Strategic Land Ltd</p>	<p>10% increase on the current affordable housing requirement. Concern that the Viability Assessment for the Comprehensive Local Plan Strategic Housing and Economic Land Availability Assessment (June 2017) indicates that viability in lowest land values areas (largely in the south of the Borough) on medium greenfield sites (Typology 4) and on large greenfield site clusters (Typology 5) at 35% affordable housing (and in some instance 25% affordable housing) become marginal or unviable.</p> <p>The policy wording which caveated that the proportion of affordable housing may be varied subject to viability considerations should be reinstated.</p> <p>Policy is not positively prepared and not sound.</p>

## 6.8 Housing for older people and people with disabilities

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
Binfield Parish Council	No comment.
534 Warfield Parish Council	Supports additional accommodation for older people and care homes. The siting of these homes is important to create a welcoming atmosphere, with good access to health care and other local facilities. Sufficient parking particularly for staff and visitors is required.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
749 HBF	PPG notes that allocating sites can provide greater certainty for developers and encourage the provision of sites in suitable locations. Given the ageing population and the limited number of suitable sites that are close to services, do not consider that relying on development management policies to deliver specialist accommodation for older people will be an effective way to meet needs.
058 Holland	There is a 'grey brigade' who wish to downsize from family homes and free larger properties for younger families to purchase; there are many within the population with disabilities requiring ground floor level only living and there are very few bungalows. The Borough needs to include the provision of such homes in current and future development plans. Buildings should be wheelchair friendly. The privacy of residents should be considered; outdoor amity space should be provided and there should be adequate parking for occupants and visitors. Bin storage, pathways for pedestrians/mobility scooters; good street lighting; an on-site shop and relevant green area with planting and benches should be provided. All roads should be accessible to buses.
424 Murphy	Questions whether: i) the categories of C2 and C3 are too restrictive in describing the varying types of housing that are emerging to cater for different levels of support, which allow older people and people with disabilities to live with the level of independence that they wish; ii) there is a case for incorporating the care industries categories, even if informally, so the demand and level of provision of different types of accommodation can be monitored. iii) if sites are not allocated this will leave BFC open to inappropriate speculative applications.
290 Miller	Housing for older people and those with disabilities should be integrated into other developments to promote integration and reduce loneliness.
741 Richardson	Para 6.8 Housing for older people and those with disabilities. Urgent need for housing for these groups given growing numbers forecasted. Need for specific policies and initiatives including Latchkey project* currently being progressed.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
506 Hawksbury Homes	Section 6.8: Housing for Older People and People with Disabilities No justification for using the midpoint between average need and national average for specialist self-contained dwellings and existing unmet need would be exacerbated. There is an undersupply of care homes in Bracknell Forest which would roll forward. Planned provision would be below the recommended level. SPRU has undertaken an assessment of the specialist accommodation needs for older people which indicates a shortfall of 3,116 units/spaces by 2036, including a shortfall of 1,036 care home spaces, which is considerably more than identified in the emerging Local Plan. The plan should be modified so that it adequately provides to meet the needs of local people to ensure soundness of the Plan. Allocating specific sites for older persons would help to achieve this.
629 Bewley	Fails to consider the implications of the updated PPG, specifically, that on addressing the housing needs of the elderly (paragraphs 63-001-20190626 to 63-019-20190626).  Although the Council's assessment has drawn on evidence from the 2012-based projections, these have since been superseded by two further data sets. Questions how reliable the Council's data underpinning assessment is. Out of date.  Attempt to obscure shortfalls to date by noting (through Tables 13 and 14) of the 2019 HBP that there are a number of extant permissions for C2/C3 development types, however what is not recognised is that these relate to future need and whilst these will (when delivered) contribute towards the shortfall, there is still a forward need to plan. Not credible to refer to other ways in which this need can be met, including the older cohorts moving into open market housing which is not adapted for older needs.
665 Lightwood Strategic	Conclusions of the Plan set out that the Council is not proactively allocating sites. However, of the need for 1,320 units of C3 for older people, only 210 units have been completed/committed, leaving a gap of 1,110.  Sites for C3 housing for older people should be identified in the plan. Land promoted by Lightwood Strategic west of Old Wokingham, is such as site, linking to the masterplan for the South Wokingham Strategic Development location.
Landsec	Type of housing appropriate to a site needs to be considered on a site by site basis to allow the optimum use of sites for all ages and abilities. Some sites may not be suitable for the elderly or higher rise flatted development. Delivery must be appropriate to the location.
675 Syngenta	Support for provision of housing for older people and those with disabilities – garden village would provide housing required at all stages of the life cycle (Opportunity to consider and meet the housing needs in addition to those required at Syngenta).

## 6.9 Self build, Custom Build and Gypsy, Travellers and Travelling Showpeople

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
368 Wokingham Borough Council	Insufficient sites identified to meet the PPTS need or wider cultural need. Note that policy LP26 [N.B. now policy LP24] has been amended to remove the requirement, unclear how and if identified needs will be met. Expect BFC to meet its Gypsy and Traveller needs in full. Encourage BFC to explore options for meeting identified and wider cultural need through plan making process.
596 West Berkshire Council	Note that the Council is meeting its own needs for pitches and that engagement with West Berkshire may be required on the provision of a transit site. Currently finalising WBC GTAA which is likely to conclude that a transit site will not be required.
957 Environment Agency	Please see our comments for Policy LP 24 - Gypsies, travellers and travelling showpeople in relation to flood risk and foul drainage.
Binfield Parish Council	No comment.
Warfield Parish Council	No comment.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
290 Miller	Provision for Gypsies, Travellers and Travelling Showpeople is essential but will need sensitivity to ensure that it can be implemented with the cooperation of the local community.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
693 Syngenta	5% of plots is equivalent to 200 homes – this exceeds number of the self-build register. Requirement should be subject to market demand. Propose amendment to Syngenta policy wording 'up to 5%'
xxx Gladman	Whilst the importance such homes in the delivery and diversity of housing in the borough is acknowledged in the Housing Background Paper (October 2019), except for the site allocation policies, the Council does not provide a policy mechanism that will enable a positive response to proposals that assist to meet these needs over the plan period. Para 6.79 sets out a number of ways that self-build and custom build plots can be delivered, but does not provide a policy mechanism. Further flexibility is needed. The Council should therefore set out a proactive policy-led approach to enabling self-build and custom-build. This should include a commitment to engaging with landowners to encourage them to consider self-build or custom build housing on their land; making use of council owned land for these products; working with custom build developers; and, setting policies that will enable self-build or custom build plots to be developed in sustainable locations that respond to locally identified needs.

## **Chapter 7 Economic Development**

### **7.1 Provision of economic floorspace (LP9)**

<b>NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT</b>	<b>SUMMARY OF MAIN ISSUES RAISED</b>
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
519 Binfield PC	Would welcome small-scale economic space in Binfield Parish Medium and large housing developments should provide some form of convenience store
537 Warfield PC, 317 Bracknell Town Council	Support Policy LP9
595 West Berkshire Council	Questions whether the market will be able to deliver the 20ha of industrial/warehousing space required over the plan period on the basis of the strategy outlined. However, it is recognised that a review of the Local Plan could take place within five years.
826 Thames Valley Chamber of Commerce and Industry	Paragraph 7.2: a sector and market led approach should reflect on sub-regional (Berkshire), regional (Thames Valley) and national strategies including the developing Local Industrial Strategy for Berkshire and the Governments Industrial Strategy and Sector Deals.
826 Thames Valley Chamber of Commerce and Industry	Encouraged to see common themes with the Chambers Business Manifesto (2020) and welcome strategic focus on key issues that affect Bracknell and the wider sub-region (includes support the Western Rail Link to Heathrow; need for a comprehensive and resilient infrastructure network, including the expansion of Heathrow Airport; Lobby Government to ensure any business impacts of Brexit are mitigated).
826 Thames Valley Chamber of Commerce and Industry	The ongoing viability and vitality of Bracknell is a balance between delivering the right mix of housing in the appropriate locations and securing sustainable economic growth linked to ensure we have the resilient in place to support the future needs of the resident and business community.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
425 Murphy	Welcomes positive economic assessment
425 Murphy	Queries whether the Council's adopted ' <i>economic vision</i> ' referred to in 7.2 was the subject of consultation.
290 Miller	There should be specific measures identified to prevent wholesale redevelopment of office space into housing. The reduces the availability of economic floorspace and enables developers to circumvent regulations regarding quality of housing and also availability of affordable housing.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
624 BRP	Note that the policy refers to an approximate quantum of floorspace. Without suitable controls being introduced (e.g. maximum quantum for each use; maximum unit size; type of A1 use) there is potential for a significantly large quantum of new retail floorspace to be delivered outside of the primary shopping area which could undermine the town centre strategy.
624 BRP	Consider there to be an urgent need to update the Retail Study as The Lexicon has now been trading successfully for a while. Also need to take account of the closure of Sainsbury's and the impact of the loss of a key town centre anchor which facilitates linked trips.
729 Landsec	The Peel Centre/the Point are well placed to assist with the delivery of a number of the key requirements. Although not promoted through the Call for Sites, this site is at the heart of the Town Centre should be referred to in this chapter, particularly Policy LP9 – wish to discuss further.  More consideration should be given to providing a flexible approach especially between classes.



676 Syngenta	<p>Total employment in 2017 in Bracknell Forest was no higher than in 2000 Total employment in 2017 was 4000 jobs lower than peak employment in the borough in 2007</p> <p>Between 2001 –2018 the number of people of working age has increased by 4,400 persons. Given increase in persons of working age there must be a significant level of out commuting. Only a summary of the new Employment Land Need assessment is available so not possible to scrutinise the findings</p> <p>The summary in July identified:</p> <ul style="list-style-type: none"> <li>- No need to provide floorspace for offices</li> <li>- Need to provide around 20ha for industrial uses</li> </ul> <p>The assessment is a starting point based upon projections based on past performance and do not take in account opportunities to boost employment growth.</p> <p>The employment needs study re-enforces under- performance in employment growth</p> <p>Study does not make reference to specialist R &amp; D space of the development of B1b/B1c or B1a at Jealott's Hill</p> <p>TVB LEP Is becoming more constrained in terms of the capacity of accommodate employment uses and the opportunity should be taken in Bracknell Forest to fill the gap. Bracknell Forest has:</p> <ul style="list-style-type: none"> <li>- the weakest record of job growth within the LEP</li> <li>- has a weak economy compared to other authorities within the LEP</li> <li>- there has been an annual growth of registered business of 2.5% pa and has the lowest 5-year survival rate of any of the TVB authorities</li> <li>- second largest number of rest of the world (ex EU) enterprises and the largest employment turnover of rest of the world firms and a relatively high representation of employment and turnover associated with EU enterprises.</li> </ul> <p>Bracknell Forest does not perform as well as other parts of Berkshire in terms of the presence of high growth/high growth potential forms as a proportion of all active firms</p> <p>How has the number of commitments for B1a office development been addressed in the analysis – i.e. is it realistic that these will come forward or are the sites being held in anticipation of securing a higher value use in the longer term?</p> <p>Para 7.9 of section 7 refers to the fact that few sites were submitted for economic development through the SHELAA. The lack of sites coming forward may reflect the fact that development for residential use may deliver a higher land value.</p> <p>BFC need to factor in the need for replacement provision of B class floorspace.</p> <p>Changing trends are reshaping demand for employment floorspace i.e. growth of on-line purchasing requires additional provision for large scale warehousing space.</p> <p>Section 7 of the Draft Local Plan makes no reference to the development of business space at Jealott's Hill which will complement the town centre provision.</p> <p>Part of the justification for the housing development at Jealott's Hill is:</p> <ul style="list-style-type: none"> <li>- to ensure the retention and growth of Syngenta</li> <li>- to provide a means to boots BF under performance in economic development compared to other LEP authorities and</li> <li>- ensure the ongoing success of the TVB LEP area as a key driver of UK economic growth and prosperity.</li> </ul>
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## 7.2 Hierarchy of 'Town Centres' (LP10)

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
518 Binfield Parish Council	Para. 7.22. Proposals for a local centre at Amen Corner South in the current application do not go far enough to create a community for the development (post office, local convenience store, chemists, hairdresser etc). Classes of business included in the application are not the kind of businesses (A2, B1, B8) which lend themselves to creation of community.
538 Warfield PC	<b>Support LP10. New local centre at Jealott's Hill is incorrectly identified as being in Winkfield.</b>
552 Warfield PC	Appendix 5: Defined 'Town Centre' maps: The proposed community hub at Priory Field should be included as a local centre with shops.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
059 Mrs Patricia Holland	The regeneration of the town centre appears to have slowed down, and it is hoped that any new stage is not going to be so long in arriving that what is there at present will have become outdated. There are no small specialist shops in town.
184 Crowthorne Village Action Group	7.22: 'Land at TRL, Crowthorne', should be 'Buckler's Park'.
492 S Collings, 410 M Collings, 911 R Wallen, 850 C Wallen, 467 Warfield Environment Group, 426 Murphy	7.22: Jealott's Hill is located in Warfield, not Winkfield.
493 S Collings, 410 M Collings	A new Local Centre is planned at/near Priory Field, Warfield.
426 Murphy	7.18 and 7.19. It is not clear from the text how District and Local centres differ in their purpose or offer in meeting everyday needs.
911 R Wallen, 850 C Wallen	Moss End, Warfield should be included - has a number of retail outlets, including food.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
354 Schyde	Would like to see Policy LP10 expanded to include Moss End facility under list of 'Local Centres'. Consider it an 'out-of-centre facility'.
625 BRP	Strongly support but note that para 7.22 refers to 4 new local centres – policy controls are required to ensure that these do not act as a main food shopping destination.
676 Syngenta	Supporting text refers to Jealott's Hill Winkfield, this should be Warfield.  Along with other proposed centres, Jealott's Hill local centre should be included in the policy text itself.
729 Landsec	The Peel Centre/The Point and the wider area could be identified within the hierarchy as an edge of centre location. Need to give the Peel Centre/the Point careful consideration to ensure that the site can be used to its full potential and not be to the detriment of other economic gains the town has made. Any policy must not be overly prescriptive. Flexibility of uses will be key to the long-term sustainability and viability of the site following the opening of the Lexicon. Site could accommodate residential, office, flexible retail and leisure in line with market demand.  Need to bear in mind that the Lexicon has only been open for 2 years so impact not yet clear. Would be premature to allocate the Peel Centre/the Point as some sort of town centre extension.

### 7.3 Edge of centre retail location (LP11)

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY	
539 Warfield Parish Council	General support
RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS	
912 R Wallen, 851 C Wallen	Plan needs a vision for the future of The Point - fail to see how Bracknell can support two cinemas in close proximity. Suggest site is suitable for affordable housing (it was council housing originally).
DEVELOPERS / PROMOTERS OF SITES	
626 BRP	The policy means that the Peel Centre is a 'second instance location' for retail and leisure proposals. This is not considered to be robust (or necessary) given that edge-of-centre for the purposes of Class A1 is taken from the defined primary shopping area (PSA). Consequently, there are potentially other edge-of-centre sites in closer proximity to the PSA which should be appropriately considered. Consider there to be no policy basis for the policy as proposed.
Landsec	<p>Policy LP11 does not fully address the requirements of Chapter 7 of the NPPF.</p> <p>The Peel Centre/The Point should be considered as part of a holistic vision for the redevelopment of the town centre, and Bracknell as a whole.</p> <p>Concerned that the town centre first policy could redirect the occupiers of units within the Peel Centre/the Point to new premises within the town centre and fails to take account of any long term regeneration opportunities to the west of the town centre.</p> <p>The "Edge of Town Centre" site is 300m from the Lexicon and 500m from the Station and consists of previously developed land in the urban area. Its current use as a retail area needs further consideration. The site offers innumerable benefits that could add significantly to the vitality and sustainability of the town centre.</p> <p>Refer to 'Bracknell Town Vision 2032' Document (2019) particularly as the vision falls within the life span of the local plan. This document identifies the Peel Centre as having the potential to unlock growth and assist with connecting the western industrial area more closely to the town centre. Policy LP11 is silent on this and should also reflect point f) of paragraph 85 of the NPPF and allow for additional complementary land uses which will help support the viability and vitality of the town centre. In particular residential uses should be encouraged.</p> <p>Existing tenants of retail units at the Peel Centre also have a presence within most town centres and following the redevelopment of Bracknell town centre some have already moved to more prominent locations on the high street – danger of more vacancies within the site. Retail stock on the site is dated and does not necessarily reflect occupier demand.</p> <p>As currently worded, the policy could restrict any potential new occupiers from entering the market, particularly as the defined impact and sequential assessment threshold is 1,000sqm. Policy is silent on the potential for subdivision or the consolidation of retail offering on the site. Policy needs to be revised to reflect the potential changes in the retail warehousing market.</p> <p>The site could help deliver some of the 11,700 sq.m. net sales floorspace for comparison goods which is required by 2026 and 27,900 sq.m. by 2036. Not clear if the above figures have accounted for the Deck development.</p> <p>It is considered that the site could be consolidated within the plan period. This would allow for the site to be brought forward for a range of uses which will support the high street rather than detracting from it.</p>

## **Chapter 8 Infrastructure**

### **8.1 Local infrastructure and facilities (LP12)**

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
173 Affinity Water	<p>Comment that only supply the eastern part of the Borough.</p> <p>Source Protection Zones: The proposed sites are not located within what the Environment Agency has defined as ground water source protection zones.</p> <p>Existing water network: Do not currently have any concerns about needs to protect/divert existing apparatus.</p> <p>Current infrastructure: (Full detail set out in a separate document provided by Affinity Water: "Bracknell Forest allocated growth sites assessment"). There will be a demand due to additional sites which would be 2.138M/d. Pressure drop is enough to justify reinforcements to the area when all future developments in the AW records and Bracknell Forest are taken into account.</p> <p>AW will continue to work with the local planning authority and developers to ensure that infrastructure is in place in line with the pace of development. Developers are encouraged to discuss their proposals with Affinity Water in advance of the submission of any planning applications utilising Affinity Water's pre-application advice service.</p>
319 Bracknell Town Council	Support policy. However, a review of CIL required, as not agree with zero CIL rating for large areas of central Bracknell.
366 Wokingham Borough Council	Consider that BFC need to engage with WBC in the production of infrastructure related document such as the IDP as number of site allocations will have significant infrastructure impacts on WBC, and necessitate improvement of the highway network in both Boroughs (for example Derby Field, Beaufort Park and cluster of sites around Binfield).
407 Department for Education	<p>Support policy.</p> <p>In terms of education, DfE's guidance for local authorities on securing developer contributions for education should be incorporated into the plan making process (<a href="https://www.gov.uk/government/publications/delivering-schools-to-support-housing-growth">https://www.gov.uk/government/publications/delivering-schools-to-support-housing-growth</a>)</p> <p>The approach to viability issues is sensible, prioritising developer contributions, deferred payments and refusing permission as last resort. Welcome the close links between LP12 and the IDP.</p> <p>(Specific comments also made on the IDP – see separate summary relating to evidence base).</p>
521 Binfield Parish Council	<p>Cumulative impact needs to be considered and demonstrated in decision making process. (This also includes impact from Wokingham Borough).</p> <p>Developments should be held to the infrastructure requirements secured during planning process. These should not be varied on viability grounds, reducing the amount of infrastructure provided.</p>
540 Warfield Parish Council	<p>Generally supportive of Policy.</p> <p>BFC should work with neighbouring LPAs/Government bodies to ensure infrastructure is coordinated.</p> <p>Parish and Town Councils should be consulted with over infrastructure proposals in their area.</p>
952 Environment Agency	<p>The Draft Bracknell Forest Local Plan Revised Growth Strategy does not contain a clear policy on Blue Infrastructure and Waste Water Infrastructure within Bracknell Forest. We recommend that a policy is included to capture these two key interlinked factors. We would also like to take this opportunity to stress the importance of reflecting the findings of your Water Cycle Study (WCS) in local policy. This is to ensure there is adequate water supply and sewage infrastructure for both allocated sites and any other new development proposed, to protect the water environment, such as water quality and biodiversity.</p> <p>In the site allocation section, the main allocation for housing will be in and around Bracknell. In the Water Cycle Study scoping report Bracknell, Easthampstead Park and Sandhurst were all identified as requiring tighter permits to prevent deterioration in river quality. Bracknell was also identified as requiring treatment upgrades. A more in depth water cycle study has yet to be completed and work had been carried out to form a 'Statement of Common Ground' between the developer and the water company.</p> <p>Where capacity constraints have been identified and not programmed in Thames Water's Asset Management Plan in the desired timeframes, the developer should set out how improvements will be completed in advance of occupation. This could include phasing of development.</p>
894 Winkfield Parish Council	Should have a specific reference to permitted development being required to support the Council's target zero net Carbon contribution by 2050
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
285 Gunn	Existing roads are congested, particularly in rush hour.
427 Murphy	Para. 8.2 the bullets do not reflect the content of the chapter.
427 Murphy	LP12 point 3. This point should not need to be invoked. Sustainable sites should not be allocated, and should not be 'propped up' with funds.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
632 Pegasus on behalf of Redrow Homes and Persimmon Homes Thames Valley	Do not object to the principle of the policy, whoever consider that the supporting text should reflect the CIL Regulations (Reg 122) and NPPF (para. 56) setting out clear legal tests which must be met (necessary to mitigate the impacts of the development, directly related to the development, fairly and reasonably related in scale and kind).
714 Gladman	The cost burden of any justified infrastructure and mitigation must be thoroughly considered within the evidence base that underpins the Local Plan. Use of CIL and s106 in Bracknell Forest must be thoroughly explained so that there is no undue burden placed on development.

719 Escrillion	<p>Need to clarify that the provisions of Policy LP 12 will also apply to individual proposals within SALP allocations (refer to land at Warfield), the latter being subject to their own individual infrastructure requirements. Suggest additional policy criterion:</p> <p><b>“4. For allocated sites, where a supplementary planning document has been adopted, this will guide infrastructure provision. Part of the allocation could be brought forward individually where the necessary infrastructure is provided, and the wider comprehensive development of the allocation is not prejudiced.”</b></p> <p>Expanding the policy wording would be within the spirit of paragraph 68 of the NPPF which advises that authorities should “work with developers to encourage the subdivision of large sites where this could help speed up the delivery of homes.</p>
758 S2 Bracknell Ltd	<p>Supportive of provision of appropriate infrastructure, but object to current wording which should go further in terms of allowing flexibility, with requirements reviewed on a site by site basis subject to negotiation. Suggest amended rewording as follows:</p> <p><b>“3. Where infrastructure requirements could render a development unviable, relevant development proposals should be supported by a <del>independent</del> viability assessment <del>on terms agreed by the local planning authority and funded by the developer / applicant</del> to be independently assessed at reasonable cost to the applicant. Where viability constraints are demonstrated by robust evidence, the Council will:”</b></p>

## 8.2 Transport principles (LP13)

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
319 Bracknell Town Council	Policy supported.
521 Binfield Parish Council	Enough parking (including visitor provision) must be provided in developments to ensure vehicles do not block roads.
541 Warfield Parish Council	There is no provision within the Plan for a network of EV charging points. Welcome the principles of the Policy.  Opportunity should be taken to reclassify parts of the existing highway network where appropriate to support development and create safe environment for non-car users.  Where existing highway is being developed/enhance, mitigation must be included for biodiversity.  Para. 8.16: to ensure consistency of parking standards, BFC should adopt development of five dwellings or more.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
051 Holland	Whilst many residents walk/use public transport, majority use cars.
117 Sleight	No specific mention of any aspirations to improve /enhance the four railway stations within Bracknell Forest.
134 Rivers, 135 Rivers, 241 Hoare, 243 Gunn	Congestion: roads in/around Bracknell are extremely busy.  Other comments include: <ul style="list-style-type: none"> <li>• Bracknell is a major route between the m3 &amp; M4</li> <li>• Roads such as A329 and A322 are already operating at maximum capacity especially in peak hours.</li> <li>• Implications for road journeys and air quality.</li> <li>• Additional housing will worsen existing situation.</li> </ul>
206 Singleton	(In relation paras. 8.13 & 8.15).  There needs to be better public transport links to provide an alternative choice to the car.  Whilst the Borough benefits from good cycle network and pedestrian routes near the town centre, these are limited between Bracknell and Ascot and no safe route between Bracknell to Ascot to Windsor.  Opportunities should be sought to improve and provide new links.
240 Hoare, 428 Murphy, 494 S Collings, 611 M Collings	<ul style="list-style-type: none"> <li>• Sites could not be selected where BFC conclude impact cannot be fully mitigated.</li> <li>• The Council has a responsibility to ensure pressure on local transport infrastructure is carefully managed.</li> <li>• Adverse impacts should be mitigated in all cases, not just 'where possible'.</li> </ul>
240 Hoare	Para. 8.11: reduction in the need to travel and choice of travel modes is not feasible.
428 Murphy	Para. 8.15: how will adequate parking at Martin's Heron station be delivered.
428 Murphy	Suggested changes to Policy LP13:  Sentence 1: To meet wider climate change obligations, it would be better to delete "seek to" and give no option but to deliver the best possible solution.  Sentence 2: The meaning of " <i>Where appropriate to the scale and nature of development</i> " is not clear, and should be deleted.
249 Sawford	No reasonable bus alternative.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
632 Pegasus on behalf of Redrow Homes and Persimmon Homes Thames Valley	Recognise and support overall objectives of the Policy. However, consider care needs to be taken to ensure the policy properly reflects the NPPF. The policy specifies a number of principles where schemes will 'only' be approved if all criteria are met. This introduces a different threshold to NPPF (para. 109) which is more onerous. Important to ensure there is consistency.
682 Syngenta	There are opportunities to provide a comprehensive sustainable infrastructure strategy for Jealott's Hill site (see comments summarised under Policy LP7).
721 Escrillion	Site-specific circumstances, feasibility and viability will need to be considered for each site with contributions only being sought if they meet all the relevant national tests as set out in paragraph 56 of the NPPF. This will ensure that development on sites, including development that has been strategically identified, is achievable and deliverable.
759 S2 Bracknell Ltd	Supportive of policy aspiration, however object to current wording, as unlikely that development will be able to address all the principles identified. Suggested rewording as follows:  "Development must seek to prevent, minimise and mitigate negative impacts on the highways network and road safety <u>where feasible</u> . Where appropriate to the scale and nature of development, schemes will be approved only where they:"
759 S2 Bracknell Ltd	Adopted parking standards are overly prescriptive, and restrictive application to town centre and non-town centre locations with no flexibility.

### 8.3 Standards for OSPV (LP14)

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY	
319 Bracknell Town Council	Policy supported.
521 Binfield Parish Council	Policy supported.
542 Warfield Parish Council	Supportive of the accessibility standards in Table 4.
RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS	
785 Woodland Trust	<p>Urge adopting policy standards for residential developments that support access to the natural environment and woodland for informal recreation. Natural England's Accessible Natural Green Space Standard recommends that all people should have accessible natural green space:</p> <ul style="list-style-type: none"> <li>– Of at least two hectares in size, no more than 300m (five minutes' walk) from home.</li> <li>– At least one accessible 20-hectare site within 2km of home.</li> <li>– One accessible 100-hectare site within 5km of home.</li> <li>– One accessible 500-hectare site within 10km of home.</li> <li>– A minimum of one hectare of statutory local nature reserves per 1,000 people.</li> </ul> <p>The Woodland Trust has developed a Woodland Access Standard to complement the Accessible Natural Green Space Standard. This recommends that:</p> <ul style="list-style-type: none"> <li>– That no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size.</li> <li>– That there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round trip) of people's homes.</li> </ul>
061 Holland	Suitable waste bins should be provided for clearing up after dogs.
429 Murphy	Support provision of additional allotments.
429 Murphy	Para. 8.22: concerns that the 'plus one' contribution is in lieu of new provision.
429 Murphy	Table 4D. Review use of 'driving' as relates to wider issues including sustainable transport and health and well-being.
249 Sawford	Developer proposals will not replace existing habitats.
290 Miller	Provision of OSPV and/or SANG should be available within walking distance of every dwelling – a target of a maximum of 1/2 mile seems appropriate.w
DEVELOPERS / PROMOTERS OF SITES	
683 Syngenta	<p>Table 2 on page 79 is very unclear on what it is seeking from Jealott's Hill.</p> <p>Table needs to be revised to make it cleared that where a SANG is provided and meets the requirements of OSPV then there should not be a requirement for additional OSPV or a contribution 'in lieu'.</p> <p>Table 4 on page 80 contains a requirement (B/C 4), derived from a 2015 Woodland Trust document, for 'no person' to live more than 500m from an accessible woodland of no less than 2ha in size. Rather than a set standard, this should be framed as an aspiration or objective.</p>
713 Gladman	(also for Policy LP15 – Green Infrastructure) Any requirement for the provision of natural green space within development proposals should be commensurate with the needs arising from that proposal having taken into account the quality and quantity of existing provision in the area.
730 Landsec	<p>The principles of PolicyLP14 are welcomed, but it needs to reflect both the requirements of placemaking within the National Design Guide October 2019 and any further changes in guidance published in the coming months.</p> <p>The value of open space cannot be under stated and every scheme should enhance the setting and wider area both in terms of visual aspect, ecology and biodiversity.</p> <p>The Council should provide details of where the financial contributions would be spent within the Borough.</p>
760 S2 Bracknell Ltd	<p>Supportive of provision of open space of public value, but object to current wording due to lack of sufficient flexibility. Trigger of 109 units is too perspective and OSPV must be reviewed on a case by case basis. Suggested amendments as follows:</p> <ol style="list-style-type: none"> <li>1. <u>Subject to viability</u> residential development should provide Open Space of Public Value (OSPV) at a standard of 4.3 hectares (ha) per 1000 persons, comprising 2 ha of Active OSPV and 2.3 ha of Passive OSPV. This can be new provision and/or financial contributions, by agreement with the Council to meet the above standard.</li> <li>2. <u>Where feasible</u> financial contributions will help fund OSPV projects which increase capacity including those identified in the Council's Infrastructure Delivery Plan using the triggers listed at Standards for the quantity of OSPV required from new development below.</li> <li>3. <u>Where feasible</u> residential development providing financial contributions in lieu of on-site provision will ensure that the quality of existing OSPV is enhanced in line with the Plus One Principle and ensure that OSPV is accessible.</li> <li>4. OSPV should accord with the Council's accessibility standards.</li> <li>5. Wherever possible, development should improve the connectivity of OSPV which may include creating new routes or the enhancement of existing routes."</li> </ol>
765 Willson Development	<ul style="list-style-type: none"> <li>• Welcomes that OSPV can be either by new provision or financial contribution.</li> <li>• The Table 4 requirement for 'no person' to live more than 500m from an accessible woodland of no less than 2ha in size, should be an aspiration rather than a set standard.</li> </ul>
Escrillion	Site-specific circumstances, feasibility and viability will need to be considered for each site with contributions only being sought if they meet all the relevant national tests as set out in paragraph 56 of the NPPF. This will ensure that development on sites, including development that has been strategically identified, is achievable and deliverable.



## Chapter 9 Climate Change and build/natural environment

### 9.1 Climate Change

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
523 Binfield Parish Council	The Climate Change Plan referred to in para 9.2 does not contain actions for planting trees as a method of combatting climate change, only as a means of providing shade or minimising water( A9 and A4).  Para. 9.5 point 2 mentions EV charging points but this is not explicit in LP52.
544 Warfield Parish Council	Supportive of the principles
580 South Oxfordshire District Council	Welcomes the greater emphasis on the topic of climate change. South Oxfordshire District Council has already declared a Climate Change Emergency.
953 Environment Agency	<b>Paragraph 9.6</b> We welcome that water quality is included as a key consideration in relation to climate change. This would be strengthened by introducing a section on blue infrastructure.  We request that the following changes are made to paragraph 9.6 for purposes of clarity on the expected impacts of climate change on flood risk as well as to ensure the protection and enhancement of blue infrastructure: <ul style="list-style-type: none"> <li>• Consideration of the risks of climate change when allocating development sites, such as through the consideration of <i>expected increases in flood risk due to climate change</i>.</li> <li>• Consideration of the impact of good design, for example in response to flood risk.</li> <li>• Consideration of the availability of water and reduction of water use through efficiency standards.</li> <li>• Consideration of water quality through review of the wastewater infrastructure.</li> <li>• Promoting green <i>and blue</i> infrastructure to allow habitat connectivity, provide urban cooling and shading, surface water management and carbon capture and storage. This is further supported by open space standards and provision of SANG <i>and the protection of river corridors</i>.</li> </ul>
894 Winkfield Parish Council	Reference should be made to Council's target zero net carbon contribution by 2050 with detailed action plans and measurable ambitious targets.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
784 Woodland Trust	Increasing tree canopy cover is an essential part of climate change mitigation and resilience. There should be explicit reference to this in 9.6 in addition to the general reference to green infrastructure
010 Brown	Mitigation and adaptation are referred to which is good as adaptation often forgotten or an afterthought.
010 Brown	Para 9.1: Human induced climate change is caused in full by greenhouse gases, not in part. It results in 'increased' hazards as these hazards are natural occurrences which are projected to get worse.
010 Brown	Para 9.5.Net zero rather than zero carbon
339 BBOWT	Para 9.5 refers to Section 9.5 refers to 'promoting zero carbon design approaches' which are passive design measures to adapt to the impacts of climate change. Reference to zero carbon development means reducing energy demand and supplying it from on-site renewables. The only site which has a specific zero carbon target is Jealott's Hill (Policy LP 7). Zero net carbon needs to be specified. All new development should mitigate and adapt to climate change and should be net zero carbon. Should be a strategy for achieving zero carbon transport which at the minimum should require provision of electric vehicle charging points in all new development. A note in Local Plan policy for zero carbon new homes is appended.
430 Murphy	Allocations are overall better located for transport with the removal of unsustainable allocations particularly Land at Winkfield Row. Benefit is lost in the allocation of LP 7, which should be deleted.
495 S Collings, 612 M Collings	Needs to be more ambitious and aim for net zero construction. Targets of 2050 are too late.
010 Brown	Para 9.6 increase priority to consider overheating in new developments. Risk that is not adequately addressed in planning. Could be added as a separate bullet. Adaptation measures include green and blue infrastructure, site layout and design.
010 Brown	Para 9.6 carbon capture and storage needs to go under mitigation heading rather than adaptation. Green infrastructure could be added under both points.
430 Murphy	9.6 and 9.7 countryside and farmland have enormous potential to take carbon out of the atmosphere by restoring nature. Conversely, destroying vegetation and sealing soil under built development represents a permanent loss we can no longer afford. Risks of climate change should be important considerations for allocating development sites.
012 Brown	Add a similar section to 9.4 flooding and drainage on overheating and drought as flooding is given priority.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
731 Landsec	Climate change and the natural environment need to sit at the heart of all new development. The Council should ensure that it informs people of the benefits that such changes can and will deliver.  Policies should also refer to the requirements of biodiversity net gain.

## 9.2 Natural Environment - Green Infrastructure (LP15)

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
319 Bracknell Town Council	Policy supported.
523 Binfield Parish Council	Nothing within the Policy about adding woodland, as it is not specified as a green asset in its own right.
545 Warfield Parish Council	Inclusion of a hierarchy could lead to developers simply paying compensation. The hierarchy does not make clear that compensation is a last route, and not a simpler route to planning approval. Supportive of policy however would like to see a definition of the meaning of the statement 'significant landscape and visual amenity assets'. Challenges the assertion that Warfield does not have assets of significance.
545 Warfield Parish Council	Should farmland be included within the scope of green infrastructure?
954 Environment Agency	In our response to your draft Local Plan in 2018, we requested a 10m buffer zone to main rivers. Whilst we welcome the inclusion of an '8m wide undeveloped area' adjacent to main rivers with policy LP15 in this policy, we still suggest that this is increased to a 10m buffer zone.  Our expert opinion is that 10 metres provides the minimum width of buffer for the function of wildlife habitats whilst being able to facilitate informal access for enjoyment of the river. Rivers and the land adjacent to them form an important and effective part of a network of linked habitat corridors to allow the movement of species between suitable habitats, thus promoting the expansion of biodiversity.  It is important that rivers and their associated corridors are protected from development through the establishment and appropriate management of buffer zones, and that opportunities are taken through redevelopment and the planning process to enhance their wildlife and landscape value. This approach is supported by the Environment Act 1995 and the NPPF.  Also, in order to provide enhancements to biodiversity, the following changes should be made to the policy to create a buffer zone between development and rivers as well as to make sure the buffer zone provides ecological benefits. Our suggested changes are as follows:  <i>Where development is proposed adjacent to a main river a 10m wide undeveloped ecological buffer zone should be created or retained between the top of the river bank and the development (20m wide undeveloped area in total).</i>  Also, in the following sentence within policy LP15 about culverts, the word 'normally' has been added to our suggested wording. This weakens the statement and should be removed as it is not clear when this part of policy LP 15 on culverting would apply. Opportunities for de-culverting rivers should also be sought to provide enhancements to biodiversity. We suggest the following wording is included in part ii of policy LP15:  <i>ii. protect and enhance the wider green infrastructure network including the connectivity of specific habitat types and de-culverting rivers as appropriate to the scale of development and the opportunities it offers;</i>  We would like to take this opportunity to suggest that there is a standalone river corridor policy. This will ensure applicants understand what is required of them when submitting planning applications in close proximity to rivers, and will help to ensure this valuable ecological asset is both protected and enhanced within Bracknell Forest, proving benefits to both biodiversity and local people. If you do include a standalone river corridor policy, the points raised above should be included. Examples can be found in the adopted Wycombe and Reading Local Plans.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
011 Brown	Make reference to shading benefits of Green Infrastructure alongside flood mitigation benefits
431 Murphy	Paragraph 9.9: opportunity to conserve a woody ecological corridor on the western side of Hayley Green.
431 Murphy	Policy reflects importance of 'more, bigger, better, joined up' GI
431 Murphy	Policy 2 <sup>nd</sup> paragraph: is difficult to understand.
431 Murphy	Policy 7 <sup>th</sup> paragraph: support 8m undeveloped corridors either side of main rivers for ecological integrity. How will this be aligned with public access?
431 Murphy	Paragraph 9.11 and 9.15: Human and biodiversity needs are not always compatible. How will this be balanced Where biodiversity/GI need prevails (e.g. vulnerable parts of river corridors), will this be recognised?
431 Murphy	Paragraph 9.17: GI review did not include the Green Belt, which distorts the picture of current GI provision in the northern parishes, and limits designing the new strategy. Green Belt forms 35% of borough area, all in the north. To devise a GI strategy that ignores it would be nonsensical. In terms of access, Green Belt is the countryside next door and performs that function exceptionally well. The Bracknell Green Belt has a large network of rural PRoW through unspoilt countryside, which connects to a much larger network beyond the borough boundary into RBWM and Wokingham: an example of high quality GI missed in the GI study. The undeveloped nature of the Green Belt makes it a valuable ecological resource. Unless it's mapped and understood, how can it be connected to areas outside the Green Belt?
431 Murphy	Paragraph 9.18 2 <sup>nd</sup> sentence: GI in the Green Belt needs to be taken fully into account for the very significant contribution it makes to GI in north Bracknell Forest and to guide 'bigger, better, more joined' up' GI in the north of the borough.
431 Murphy	Paragraph 9.18: ecological corridor on the western side of Hayley Green, now subject to development pressure from the west (SA9/Area 3) and east (NP allocation), which increases its significance. Woodland/hedgerows on both side of Hayley Green road connect Priority Habitat Deciduous Woodland in LWS/LNR Hayley Green Woods to the TPO woodland of Warfield House parkland, and so Green Belt hedgerows/woodland including The Cut wooded corridor. Hedgerows are now acknowledged as important GI. Extension of the green wedge north of Forest Road at this point in the new proposed strategic gap is welcome. Could ecological connectivity be supported by designation (area TPOs) for woody vegetation along Hayley Green? TVERC records should support; if not there are reliable local records for woodland/hedgerow bird species, including protected species. Early 19thC maps indicate the longstanding wooded areas, with similar woodland persisting and old pre-enclosure boundaries recognisable today.
472 Warfield Environmental Group 916 R Wallen, 855 C Wallen	Para 9.10 - farmland should count as green infrastructure. Most fields are bounded by mature hedging and trees and some have wild flower strips and rich understoreys to the hedging.

916 R Wallen, 855 C Wallen	Para 9.17 - "Some parishes have significant landscape and visual amenity assets (e.g. Crowthorne and Winkfield), but others do not (e.g. Warfield)." Query what counts as an amenity asset and why Warfield has been classified as lacking.
383 BBOWT	Welcome development of a green infrastructure strategy and look forward to opportunity to review it.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
685 Syngenta	Support the objectives of the Policy.  (Comments made in respect of Jealott's Hill, summarised under Policy LP7).
731 Landsec	Policy needs to make reference to the National Design Guide published October 2019.
Escrillion	Site-specific circumstances, feasibility and viability will need to be considered for each site with contributions only being sought if they meet all the relevant national tests as set out in paragraph 56 of the NPPF. This will ensure that development on sites, including development that has been strategically identified, is achievable and deliverable.
764 Willson Development	Support, however it should state "the borough's green infrastructure network will be protected and enhanced <u>where possible</u> ", to accord with the NPPF.

### 9.3 TBH SPA (LP16)

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
319 Bracknell Town Council	Policy supported.
523 Binfield Parish Council	Policy supported.  4.iii – typo '10 or more'
546 Warfield Parish Council	<ul style="list-style-type: none"> <li>Concerned about the propensity of off-site SANG and the impact this has on the environment, particularly through vehicle movements.</li> <li>WPC would like to see tree planting take place on SANG where this can be accommodated. Existing wildlife should be suitably protected, particularly from dogs, when SANG allocations are made.</li> </ul>
883 Royal Borough of Windsor and Maidenhead	<ul style="list-style-type: none"> <li>Unclear whether there will be enough SANG capacity for the proposed housing allocations. No evidence in Strategic Revised Growth Study and evidence base, regarding SANG capacity and number of completed dwellings, and financial contributions collected. Draft HRA indicates proposal of purchasing SANG capacity for larger site allocations. Clarity needed.</li> <li>Housing site allocations will result in reduction in air quality on the SPA. Further mitigation work needs to be carried out in this area.</li> </ul>
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
186 Crowthorne Village Action Group (CVAG)	Both Beaufort Park and Derby Field are less than 2.5 km from the boundary of the Thames Basin Heaths Special Protection Area (SPA). The authority has an obligation to ensure that any new development does not have a negative impact on the SPA, including on air quality. Part of Derby Field is on the B3348, a road in the Crowthorne AQMA. The part of the SPA nearest to Beaufort Park is on B3430 and air quality is likely to be poor there due to long lines of stop start traffic every weekday. The Bracknell Plan 2013 has already allocated 1,400 more homes to be built in Crowthorne which will greatly increase traffic in the area. Most of these are yet to be built so the impact of those additional cars on levels of NO2 at the SPA is also unknown. It is therefore difficult to see how, with so many unknowns, BFC can, with any certainty, forecast the impact of either 226 homes at Beaufort Park or 217 at Derby Field, either separately or in combination, on air quality at the SPA boundary. Consequently, it would be highly risky for BFC to include either of these sites in a proposed land allocation strategy to be presented for external inspection.
191 Campaign to Protect Rural England – Berkshire Branch (CPRE)	More evidence required in relation to air quality impacts both new areas of development and on nearby areas of import landscape and wildlife interest. Support the views of CVAG.
640 S Collings, 612 M Collings, 640 Collings	Take issue with providing off-site SANG which requires access by car - not a sustainable approach.
640 S Collings, 612 M Collings	More trees should be planted on SANG in an attempt to address climate change.
640 S Collings, 612 M Collings, 640 Collings	Para 9.28: The provision of SANG (none of it being left inaccessible to the public and their dogs), is impacting on the ground-nesting Skylark which has a UK conservation status of red (highest conservation priority). There are no longer Skylarks at Larks Hill, Warfield and concerned for Skylarks at other locations. The Dartford Warbler and Nightjar both have a UK conservation status of amber, and the Woodlark green. Is it right to protect certain birds of lower conservation status to the detriment of another which is more threatened? Make changes to the way SANG is developed to address this issue as a matter of urgency.
432 Murphy	Policy for European sites has reasonably under the SPD for the TBH SPA. Air pollution was added as an additional potential threat for European sites in the early 2010s. Designated sites and Appropriate Assessment potentially including air quality for European sites are dealt with in LP 44 in Part 2, with TBH SPA and Windsor Forest and Great Park SAC named in accompanying text 16.1.4. Is there a case for bringing all policy for designated sites together?
915 R Wallen, 856 C Wallen	SANG that has been provided is mostly a mono culture which is not bio diverse and has reduced positive value in terms of climate change. Existing environment is more diverse.  Natural England's guidance for SANG allows copses and woodland to be provided as SANG. More woodland should be provided as SANG to mitigate the effects of climate change and add to biodiversity. The SANG provided in Warfield is predominantly grassland.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
686 Syngenta	<ul style="list-style-type: none"> <li>Paragraph 9.26 is not correct, as it states that development must avoid or mitigate harm to the TBH SPA in order to comply with the law, whereas in actual fact the Habitats Regulations / Directive can permit development that causes harm if it passes the 'Imperative Reasons of Overriding Public Interest' (IROPI) test.</li> <li>The reference in Paragraph 9.28 refers to the old (original) Bird's Directive, which has since been codified and replaced by an updated Directive that is not mentioned (Directive 2009/147/EC).</li> <li>Policy LP16 – There is a typo in the text next to criterion 4iii ('ore' instead of 'more').</li> </ul>
732 Landsec	The Council needs to consider the balance between putting developments in the most sustainable locations and the ability to provide SANGS. The development of large urban sites must be efficient and providing a SANG on site is simply not possible.
722 Escrillion	<ul style="list-style-type: none"> <li>Support policy in principle but under LP16 (2), "larger residential developments which are not Local Plan allocations" needs defining - a clear threshold needs to be set.</li> <li>LP16 (4) (iv-v), similarly, clear thresholds need to be confirmed in respect of what would constitute "small developments" and "large developments" for the relevant SANG standards to be applied.</li> <li>Policy LP16 only refers to two types of SANG – "strategic" and "bespoke" - . It is therefore inconsistent with the Council's adopted Thames Basin Heaths SPA Supplementary Planning Document (April 2018) which also covers the use of "third party" SANGS</li> <li>It is unclear how individual developments that sit within larger allocations will be expected to secure and deliver SANG provision. For instance, under the 'Land at Warfield' (Policy SA9), a preferred bespoke SANG solution is envisaged at Cabbage Hill with potential for a part solution to be "off-site". Whilst a bespoke SANG at Cabbage Hill has already been secured under permission 13/01007/OUT and subsequently delivered, there only remains 3.59 ha of residual SANG land at Cabbage Hill to serve remaining parts of the allocation (Source: Thames Basin Heaths Special Protection Area SPD, April 2018). More recently, a number of residential schemes within the allocation have been permitted where they have used off-site bespoke/third party SANGs whose residual SANG capacity in turn is available for other developers within the allocation to purchase in order to serve their own development. Therefore, the wording of Policy LP 16 should clarify that planned development within retained allocations, which require SANG provision, can use bespoke or third party private SANGs within and beyond the allocation to secure the appropriate mitigation.</li> </ul>
666 Lightwood Strategic	<ul style="list-style-type: none"> <li>Little evidence to show the extent to which the revised growth strategic can be delivered over the plan period in terms of availability of SANG.</li> <li>A topic paper was provided by Rushmoor for the Local Plan review, similar is needed for Bracknell.</li> </ul>
715 Gladman	It is important that a positive strategy is put in place for the enhancement and protection of environmental assets of this nature and that this is considered within the Council's viability evidence.

968 Jordan Construction, 979 Wellington College	Concerns about supporting para. 9.30 " <i>Other small development sites in areas outside of the defined settlement boundary may have to provide or contribute towards a bespoke SANG solution</i> " unclear why small developments outside of settlement area which are otherwise acceptable in policy terms, would not qualify for Council-owned strategic SANG capacity. If BFC experienced a 5 yr HLS shortfall in future, wording of Policy LP16 and supporting text may prevent small sites outside settlement from coming forward. Recommend sentence deleted.
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## 9.4 Flooding and drainage (LP17)

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
523 Binfield Parish Council 955 Environment Agency	Policy supported. <b>LP17</b> We welcome many of the changes made to the Flooding and drainage section of your plan and policy LP17, such as the inclusion of 'suitable allowances for climate change', 'early discussions with the EA for sites within flood risk areas' and the comments in 9.39 on groundwater flooding and that much of the Borough is in Flood Zone 1.  However, as stated in our response to the draft Bracknell Local Plan dated 26 March 2018, this flood risk policy (previously LP40) is not currently based on the results of your SFRA and so is not specific to your LPA. We request the following changes are made to LP17, in accordance with the Bracknell Forest Council Strategic Flood Risk Assessment and national policy. This policy would also be better suited in Part 2 of your Local Plan (Development Management) as these considerations are relevant to site specific planning applications.  1. In the areas defined as functional floodplain in the Bracknell Forest Council Strategic Flood Risk Assessment, or more recent flood modelling, only water compatible uses and essential infrastructure development will be supported 2. Development will only be permitted if: i. the sequential test is applied to the location of development taking into account flood risk from all sources, both now and in the future and is passed; ii. the sequential approach is applied to the layout of development within an application site, taking into account flood risk from all sources, both now and in the future, to ensure that the most vulnerable development is located in the lowest risk flood areas within a site; iii. where application of the exception test is required by national policy, it is fully complied with; and iv. flood risk from all sources of flooding, now and in the future including climate change, is taken into consideration and fully addressed. 3. Minor development (20) and changes of use (21) are excluded from the application of the sequential test. 4. A Flood Risk Assessment (FRA) will be required for developments in areas identified in the latest SFRA as being at risk of flooding now or in the future, and when required by national policy. The FRA is required to demonstrate that: i. all forms of flooding have been considered; ii. the development will not exacerbate increase flood risk off-site over the lifetime of the development and implements opportunities to reduce the causes and impacts of flooding; Any loss of floodplain storage capacity must be compensated for to ensure the total volume of floodplain storage is not reduced. iii. suitable allowances for climate change have been taken into account in accordance with the most up to date guidance; iv. the development is safe for its lifetime from all forms of flooding with finished floor levels set above predicted design flood levels; and v. safe access and egress routes are provided.
955 Environment Agency	Paragraph 9.38 in the supporting text states that developers should 'have regard to the SFRA when submitting planning applications'. The use of the word 'regard' is insufficient, and we request this phrase is replaced with 'all development proposals should comply with the recommendations of Bracknell Forest Council Strategic Flood Risk Assessment (SFRA)'.
955 Environment Agency	Paragraph 9.45 could be strengthened by including the following sentence for clarification: A sequential approach to the layout of a development site can reduce the risk of flooding through avoiding areas at risk of flooding from all sources and not increase flood risk overall, both off and on site. This approach also ensures that the most vulnerable development is located in the area at the lowest risk of flooding. Although the first preference is to avoid flood risk, where this is not possible flood resistant and resilient measures can be incorporated into the design of buildings and infrastructure. Design can be addressed in site specific FRA. The Council's Design SPD (March 2017) provides further information.
960 Environment Agency	As mentioned in our response to part 1 of your draft Local Plan, your proposed LP17 Flood Risk would be better suited as a development management policy. Please contact us if you would like further guidance on creating a robust policy.
Warfield Parish Council	Section 9.34 is noted.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
012 Brown	Agree focus should be on surface and ground water flooding. Should refer to incentives to increase uptake of green SUDs, natural flood management and property level resilience measures.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
777 Boyer on behalf of W J Channing and Sons (Woking) Ltd Minstead Ltd and Markfield Ltd, 889 Bloor, 969 Jordan Construction, 980 Wellington College	Policy does not appear to make an exception for sites within flood zone 1, which would not ordinarily require sequential test to be undertaken. Policy appears to require all applications other than for minor development/ change of use, to undertake sequential test.  Suggested amendment:  <i>"Minor development, and changes of use and sites in Flood Zone 1 are excluded from the application of the sequential test, unless the Strategic Flood Risk Assessment for the area indicates that there may be flooding issues on the site now or in the future."</i>
655 Spitfire Bespoke Homes Ltd	Although the supporting text to draft Policy LP17 states that "the majority of the Borough is within Flood Zone 1", draft Policy LP17 does not appear to make an exception for sites within Flood Zone 1, which would not ordinarily require a sequential test to be undertaken.  Policy seems to suggest that a sequential test must be undertaken for all applications (other than those for minor development or changes of use). There is no justification for this requirement to apply to sites in Flood Zone 1, at low risk of flooding and this is not in accordance with the NPPF or other guidance in relation to flooding.  Suggest that the wording of LP17 is amended to incorporate the following: <i>"2. Minor development, and changes of use and sites in Flood Zone 1 are excluded from the application of the sequential test, unless the Strategic Flood Risk Assessment for the area indicates that there may be flooding issues on the site now or in the future."</i>



## 9.5 Separation of settlements (gaps) (LP18)

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
523 Binfield Parish Council	Policy supported. If possible would like to see provision for sport and recreation in these gaps.
549 Warfield Parish Council	The establishment of a SANG wedge in the north of Warfield (either completed, nearing completion or at the planning stage) should be recognised as a green wedge.
894 Winkfield Parish Council	Should have specific reference to permitted development being required to support Council's target of zero net Carbon contribution by 2050.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
432 Murphy	Paragraph 9.52: sentences 1 and 3 seem incompatible. The first suggests development is inappropriate, the third that it isn't. Could text be reviewed to make clear?
432 Murphy	Paragraph 9.53: limiting the study area to south of Forest Road, (i.e. reviewing/updating the Entec 2008 study findings) is proving inadequate to support the current Plan. BFC and Warfield Parish Council have both proposed sites north of Forest Road, and speculative applications are being made in Warfield and Binfield and in some cases approved on appeal. There is no evidence base for policy and decisions to prevent what threatens to be urban sprawl across the countryside north of Forest Road. Is this intentional?
918 R Wallen, 857 C Wallen	Para 9.53 - the strategic gaps study stopped south of Forest Road – study needs to be extended to cover land north of Forest Road where there is increasing pressure to build on green fields. The character of areas such as Warfield Street is being threatened due to inadequate 'green wedge' protection. Also, the Forest Road area opposite West End (Home Farm) is vulnerable. Acknowledge that the Warfield Neighbourhood Plan has policies covering 'north of Forest Road' but sadly not the Home Farm area.  If the Jealotts Hill development was to go ahead, it would be appropriate for this plan to include a Green Wedge between the new 'village' and the defined settlement boundary for the SA9 area.
<b>Bracknell-Crowthorne Gap</b>	
185 Crowthorne Village Action Group (CVAG)	<ul style="list-style-type: none"> <li>• Pleased that the strategic gap between Bracknell and Crowthorne has been reinstated.</li> <li>• Concerned regarding definition of what constitutes a 'strategic gap' – considers this has been watered down compared to previous draft Plan and existing documents, now being downgraded to 'landscape functions', with no mention of physical impact, preventing coalescence or cumulative impact. Current Core Strategy refers to 'character, appearance or function of the land' and the 2018 Draft Plan referred to 'physical and visual' separation.</li> <li>• Suggested amendment: <b>Within strategic gaps development will only be supported where it can be demonstrated that it would not adversely affect the gap's function and not unacceptably reduce the physical and visual separation of settlements either within or adjoining the borough</b>  <b>The cumulative impact of developments is a key consideration because over time the unique landscape characteristics and strategic gaps can be eroded or harmed, both physically and through visual impacts.</b></li> <li>• Policy LP5 (Beaufort Park) would be contrary to the Policy.</li> </ul>
191 Campaign to Protect Rural England – Berkshire Branch (CPRE)	Concerned regarding redefinition of the Crowthorne gap – support the views of CVAG.
641 Collings	If Jealott's development were to be approved a Green Wedge should be included between the new 'village' and the defined settlement boundary for the SA9 area. This could protect against encroachment north of Forest Road (Scotlands Farm and Moss End areas).
<b>Bracknell-North Ascot Gap</b>	
200 & 207 Singleton	<ul style="list-style-type: none"> <li>• Welcome the inclusion of the 'Bracknell-North Ascot' gap, but raises concerns regarding the commitment to protect this gap – given this gap was not included in the Core Strategy (ref to Inspector's report).</li> <li>• What is the purpose of this gap, when there has already been so much development.</li> <li>• Normal planning and development management policies do not prevent coalescence e.g. many buildings in the Green Belt north side of London Road from Fernbank Road to Priory Road, and the east side of Priory Road.</li> <li>• To give extra protection - this land should be included as part of the London Metropolitan Green Belt in order to mitigate loss of Green Belt at Jealott's Hill.</li> </ul>
242 Hoare	<ul style="list-style-type: none"> <li>• The proposed gap is not a clean gap – as there are already many developments within it.</li> <li>• The smaller gaps between protection as there is a serious risk of coalescence.</li> </ul>
351 Society for the Protection of Ascot and Environs	The current strip of Green Belt is inadequate to prevent coalescence of the two urban areas. Area already under pressure from development (Brackens and Westwood House). The area needs further protection than a formal strategic gap would offer.
223 Chavey Down Association	<ul style="list-style-type: none"> <li>• Welcomes the gap between Bracknell and north Ascot, however request that the separation of settlements recognises the distinct nature of small settlements (Chavey Down and Winkfield).</li> <li>• Risk of coalescence is increased with proposed settlement boundary changes at Mushroom Castle and London Road tip.</li> </ul>
641 Collings, M Collings	Need a new gap between any new settlement at Jealotts Hill and the settlement boundary further south.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
	General

<p>990 Woolf Bond Planning on behalf of Warfield Park Homes, 695 Woolf Bond Planning on behalf of JPP Land Ltd</p>	<p>Object to inclusion of policy, not justified. Approach of policy LP1 provides the protection sought by the Council. In relation to soundness, policy should be deleted.</p> <p>Gaps as illustrated on the key diagram were prepared in the context of the Draft South East Plan, as acknowledged in the Landscape Recommendations Report . The draft policy was subsequently omitted from the South East Plan, consequently no longer support for such designations.</p> <p>Guidance on growth in countryside changed since 2012 NPPF, and therefore assessment should be based on the 2019 NPPF. 2019 NPPF no longer seeks to protect the intrinsic character of the countryside, therefore separation policy is inconsistent with national policy, and the principle of settlement separation as envisaged by the Policy should be omitted.</p> <p>Representation also refers to difference between the gaps identified in the Landscape Recommendations report, and those in Figure 3 of the draft Plan. The evidence relied on by the Council does not support the extended areas identified in the draft Plan, and no evidence on why revisions have been made in some locations and not others.</p> <p>Also refers to the fact that some of the gaps (as a north-east Bracknell covering Warfield Park and Chavey Down (was not included in the Core Strategy, and not supported by the Core Strategy Inspector. Conversely gap is omitted from the allocation associated with Beaufort Park (Policy LP5) which supports the view that LP18 should be omitted otherwise it would unnecessarily constrain growth in the Borough.</p> <p>Policy LP20 details policy maps changes, but no maps within the document relating to the extent of settlement areas as indicted on Figure 3.</p>
<p>667 Lightwood Strategic</p>	<p>Supporting text form LP18 &amp; LP35 should correlate so there is no doubt as to the purpose of as settlement gap.</p> <p>Supporting text to LP18 (paras. 9.50-9.54) landscape function, with further information set out in LP35.</p> <p>Given the supporting text to LP18 notes settlement gaps are a landscape function, object to the function of two concepts in the title of LP35.</p> <p>(Also see detailed comments summarised under LP35)</p> <p>Although not that the two concepts are covered separately by points 1 and 2, suggest point 2 should have its own policy reference, i.e. development in settlement gaps.</p> <p>Suggest that the policy test in clause 2 is different to the supporting text of 13.1. Unhelpful to have two different concepts. Policy wording refers to the need to “development would <u>not adversely affect</u> the function of the land, and <u>not unacceptably reduce</u> physical and visual separation”</p> <p>Comments on para 13.1.1 – no need to refer to coalescence if the objective is the need to maintain a significant gap. Suggested text amendment to supporting text:</p> <p>“Development proposals in strategic gaps will be resisted if they <del>lead to the coalescence of settlements</del> or fail to maintain a significant gap between them”</p> <p>Suggest that clause 2 of LP35 is given its own policy reference, and be amended as follows:</p> <p>“2. Within defined separation of settlements (gaps), development will only be supported where it can be demonstrated that it would maintain a significant gap between <del>not adversely affect the function of the land, significantly and not unacceptably reduce the physical and visual separation of settlements</del> either within or adjoining the borough. The LPA will have regard to both physical and visual matters in determine the significance of the proposed effect on settlement identity.”</p> <p>Undisputed that effect on landscape character will need to be assessed, but consider a conflict to relate character to separateness. The supporting text to LP18 deliberately keeps the two concepts separate, but 13.3.11 to LP35 does not.</p>

501 Bracknell Land Limited and Tingdene Parks Limited	Do not consider there is support in national guidance for the provision of separation of settlements/strategic gaps. If continue the gaps policy, it should identify the minimum amount of land necessary to maintain the gap. In the previous draft local plan, the Hideout site was proposed for development, therefore it was not considered necessary to keep this area open (irrespective of the lawfully implemented residential caravan site use that has since been certified), and this land should not be included in the 'gap'.
981 Wellington College	Inappropriate for Wellington College Estate to fall within the Strategic Gap between Crowthorne and Sandhurst. It is neither an 'open area of land' or 'predominantly undeveloped'. Request designation removed. Strategic Gaps are not an absolute constraint, must be balanced against other needs, including housing/ educational requirements.
<b>Bracknell-North Ascot Gap</b>	
143 Leigh & Glennie Ltd	<ul style="list-style-type: none"> <li>No sound evidence for the designations, nor any need.</li> <li>National policy does not set out any basis for 'strategic gaps'. The NPPF and PPG are based on identifying valued landscape and protecting those, not the basis of strategic gaps.</li> <li>Criterion b) is adequately covered by proposed Policy 35.</li> <li>Gap between Bracknell and Ascot was previously rejected at the Core Strategy examination "gap 4". Not clear what the changes are/new evidence to now justify a gap in this location (not under threat, no change in character since the previous ENTEC report and Core Strategy).</li> <li>Remove proposed Bracknell/North Ascot gap from Policy LP18 and the modified Proposals Map.</li> </ul>
394 Crown Estate	<p>No new evidence to support extension of strategic between Bracknell and North Ascot to cover the Bracknell East site. Contrary to the advice of the Core Strategy Inspector, who stated "...it seems to me that North Ascot is separated from Bracknell by the Green Belt, albeit by a relatively narrow strip of Green Belt. Therefore, there can be no real threat of coalescence." Circumstances have not changed and NPPF continues to provide strong protection of the Green Belt reinforcing the five purposes of the Green Belt, all of which relate to coalescence (paragraph 134). Inconsistent approach with the London Road Tip where the settlement boundary is proposed to be extended. Contrary to para 35 of the NPPF.</p> <p>LVA submitted shows that the Bracknell East site is well contained with localised views – sensitively designed development would not impact on gap.</p>
780 Boyer on behalf of W J Channing and Sons (Woking) Ltd Minstead Ltd and Markfield Ltd	Land at the Rough is identified as being within the Bracknell-North Ascot Strategic gap. Due to be surrounding by existing development, any development of the site would not affect or reduce the physical and visual separate of the gap. Due to existing residential development and tree cover to the west, there are extremely limited views of the site, so does not have a distinct separate. The site should not be removed from the gap.
654 Boyer on behalf of Nicholas King Homes	Land to rear of 89 Locks Ride now identified as being within Bracknell-North Ascot Strategic gap. Inappropriate to include former rear garden area of domestic scale and has no relationship to the wider agricultural and equine holdings. Too small and existing hedgerow important feature to be retained, given visual and ecological benefits. Gap would be more defensible and effective on the northern boundary of the site where hedge/ trees currently exist. Site does not assist in separation of settlements due to enclosed nature, and instead is a logical infill rounding off settlement. Does not lend itself to any visual function of a strategic gap. Consider original proposed allocation should be reinstated (summarised under non-allocated sites).
565 Turley on behalf of Berkley Strategic Land Ltd	<p>Supporting text supports development within the identified strategic gaps where is would not affect the gaps function and not unacceptably reduce the separation of settlements.</p> <p>The SA acknowledges that the designation of the strategic gap policy may restrict delivery of housing however the consequence of the restriction is offset by the allocation of sufficient land to meet development needs. This should be reiterated in Policy LP18 to ensure a consistent approach or refer to Policy LP35 which makes reference to this in the policy.</p>
<b>Bracknell-Wokingham Gap</b>	
667 Lightwood Strategic	<p>Comments made in relation to the proposed gap between the South Wokingham Strategic Development Location and Jennetts Park.</p> <p>Outer boundary of the gap follows the Old Wokingham Road from the former TRL this deviates to follows the administrative boundary just as the Old Wokingham Road bends to the east towards the junction with Peacock Lane and Waterloo Road.</p> <p>Consider the gap should follow the road rather than administrative boundary. Land between the roads and the administrative boundary could be developed as an extension of the South Wokingham SDL, whilst maintaining a significant gap.</p>

## **9.6 Built environment – design principles (LP19)**

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
107 SE Water	In relation to energy efficiency that is detailed in the LP19 policy, it is felt that water efficiency should also be detailed as a high standard of design within developments
320 Bracknell Town Council	Policy is supported, particularly regarding the operation of Bracknell town centre. The character section of the emerging Bracknell Town Council Neighbourhood Plan should be referenced in the policy.
456 Historic England	Reference to understanding the historic environment should be detailed in this strategic policy as set out in the National Design Guide.
523 Binfield Parish Council	Whilst policy is supported, questions whether this does enough to support the vision in section 3.1. In particular, "will continue to enjoy the strong sense of community and inclusiveness as well as social interaction and cohesion".  Design principles could specify that all developments must contribute to achieving this goal – with community infrastructure integral to any development. This could relate to focal points such as a seating, green, pond etc.  Would welcome a design principle which includes provision of both/either indoor/outdoor sporting facilities in the northern parishes as a key community asset.
548 Warfield Parish Council	Policy supported. However, would like stronger wording on maximising energy efficiency. WPC expects BFC to follow the principles for character areas as set out in neighbourhood plans
896 Winkfield Parish Council	Would like to see specific requirement for development to achieve a zero net carbon solution, to support wider climate change objectives.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
782 Woodland Trust	Welcome policy to retain existing trees, though there is no policy on the replacement of trees that may be removed, nor any requirement to provide additional trees as part of new developments.  Welcome policy that existing trees, green spaces and hedges should be integrated, protected and enhanced in new developments; doing this early in the design process minimises costs and maximises potential environmental, social and economic benefits.  Recommend Woodland Trust Guidance: <i>Residential developments and trees - the importance of trees and green spaces</i> (January 2019).  Recommend the following additions: <ul style="list-style-type: none"> <li>• Target tree cover of at least 20% pursued through retention of important trees</li> <li>• Appropriate replacement of trees lost through development, ageing or disease, through planting to support Green Infrastructure.</li> </ul>
013 Brown	Noted that policy refers to overheating, however, reference could also be made to how new developments will make use of low carbon heating after 2025.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
687 Syngenta	Unclear why a masterplan and design code are required a pre - requisite of a planning application. The applicant has the statutory right to make an application without either. It would be premature and inappropriate to have a design code prepared ahead of the submission of a planning application.  Any Design Code would become unwieldy without a masterplan with no clear separation between the vision/overarching design principles and the detailed design requirements (i.e. split between an outline application and reserved matters)  It would be impractical to require excessive detail at an early stage which then requires subsequent amendment later during the development.  The policy and para 6.51 need to be amended to clarify the requirements of both a masterplan and design code to enable flexibility in the preparation of such work alongside a planning application, up to the point of determination.
733 Landsec	Policy needs to include the requirements of good place making as detailed within the National Design Guide October 2019 and should also seek to ensure that the sustainability and environmental impact of buildings is considered.
Escrillion	Site-specific circumstances, feasibility and viability will need to be considered for each site with contributions only being sought if they meet all the relevant national tests as set out in paragraph 56 of the NPPF. This will ensure that development on sites, including development that has been strategically identified, is achievable and deliverable.
761 S2 Bracknell Ltd	Supportive of all developments achieving a high standard of design, but object to policy wording as needs to include greater emphasis on providing housing which is reflective of site and location.  Should be recognition that brownfield sites in sustainable locations are suitable for higher density development, with a respective unit mix to reflect this.  Requirement of a Masterplan and Design Code at Point 2 is overly prescriptive, and should include flexibility.  Suggested amendments as follows:  "Masterplans and Design Codes <del>will</del> <u>may</u> be required for larger, complex or more sensitive developments <u>submitted in outline format in order</u> to agree an overall vision and strategy for a development as a whole that demonstrates a comprehensive and inclusive approach to design. <u>The requirement for these documents will be required to be agreed reviewed on a case-by-case basis</u> with the Council prior to the submission of any planning applications for the site."
778 Boyer on behalf of W J Channing and Sons (Woking) Ltd Minstead Ltd and Markfield Ltd, 982 Wellington College, 970 Jordan Construction, 654 Boyer on behalf of Nicholas King Homes	Support idea of strategic policy for design, but at present policy does not relate to strategy and duplicates wording of LP39. Both policies should be revisited and revised.

778 Boyer on behalf of W J Channing and Sons (Woking) Ltd Minstead Ltd and Markfield Ltd, 982 Wellington College, 970 Jordan Construction	Neither policy wording or supporting para's 9.61/14.1.12 clearly define 'larger or more complex' development is for purposes of these policies. Unclear what threshold is above which Masterplan/ Design Code sought. Also unclear at what stage they should be submitted.
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## Chapter 10 Changes to Policies Map (LP20)

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
551 Warfield Parish Council	Para 10.5: Confused by the numbering for the Limes. Numbers and description are contradictory.
551 Warfield Parish Council	If LP7 is brought forward expect to see Jealott's Hill designated as a defined employment area.
945 Environment Agency	When reviewing the draft policies maps 1 to 4, it was difficult to locate watercourses and determine if sites would impact on them. Rivers and lakes should be clearly shown on these maps as they are important features of the landscape.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
223 Chavey Down Association	<ul style="list-style-type: none"> <li>Proposed change to the settlement boundaries for example land to rear of Neuchatel and Brickfield will unlock the green gap between settlement – development pressure.</li> <li>Query inclusion of London Road tip within settlement – will increase development pressure in the future, and increased risk of coalescence.</li> </ul>
496 S Collings, 613 M Collings	Para 10.5: (Nos 17-16 The Limes) incorrect?
919 R Wallen, 858 C Wallen	<p>Para 10.11 – due to scale of Syngenta Business Park shouldn't it be listed as an Employment Area?</p> <p>Para 10.17 – if Jealotts Hill development is to be included it would be appropriate to include a Green Wedge between the new 'village' and the defined settlement boundary for the SA9 area. Need to protect land north of Forest Road against encroachment (Scotlands Farm and Moss End areas).</p> <p>Para 10.18 – fail to understand why none of the hamlets of Warfield are specified as Green Belt villages e.g. Tickleback Row/Moss End as have similar characteristics to Brockhill in Winkfield.</p>
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
144 Leigh	Objections raised in relation to the identification of Green Belt Villages (see comments summarised against Policy LP34).
507 Hawksbury Homes	<p>Draft Policies Map 2 – Warfield and Winkfield North</p> <p>Settlement boundary should be amended to include outline consents 19/00006/OUT and 16/01004/OUT.</p>
573 Woolf Bond Planning on behalf of Warfield Park Homes, 588 Woolf Bond Planning on behalf of JPP Land Ltd, 699 Woolf Bond Planning on behalf of JPP Land Ltd	<p>Generally support revisions to the Policy Map, but object on the following matters:</p> <ul style="list-style-type: none"> <li>Derby Field Site (Policy LP6) should not be included in the settlement boundary (see separate summarised comments relating to this site).</li> <li>All sites with planning permission (outline or detail) with adjoin existing residential areas should be incorporated within the settlement boundary *such as sites relating to land north of Tilehurst Lane). Only including sites within implemented (full or part) permissions at April 2019 will mean the plan will be out of date and not justified, when considering extent unimplemented permissions at this date, together with others granted since.</li> <li>No justification for amending settlement boundary to include land north of London Road. No evidence to justify include, when sites with permission have been unjustifiably excluded.</li> </ul>
573 Woolf Bond Planning on behalf of Warfield Park Homes,	<ul style="list-style-type: none"> <li>Full extent of Warfield Part Homes estate (including site with permission for addition 82 homes WINK16) should be included within the settlement boundary to reflect established residential status of the areas, and should be excluded from any strategic gap (map provided with representation). Refence made to other examples within BFC in terms of consistency such as proposed allocation of Herschel Grange (WAR9)</li> </ul>
627 BRP	Delete edge of centre designation of the Peel Centre. Strongly object to the substantial reduction in the primary shopping area of BTC. Refers specifically to the omission of southern part of Princess Square Shopping Centre, including the Sainsbury's store - no justification given.
688 Syngenta	Support the change to the Proposals (Policies) Map to amend the settlement boundary to include Jealott's Hill, Warfield, specifically LP20 criterion x, amendment to the Green Belt boundary (removal of park of Jealott's Hill allocation from the Green Belt).
762 S2 Bracknell Ltd	Comments on Bracknell Beeches site are summarised under section 6.3 in relation to sites.
716 Gladman	It is not necessary to provide a list of the changes to the policies map within policy wording.
966 Jordan Construction	Given likely Hayley Green will allocated and adopted ahead of BFLP and principle is supported by BFC, settlement boundary should be amended on policies map to reflect the future planned housing development.
797 Savills on behalf of M&G Real Estate	Requests removal and de-allocation of M&G's Homebase site from the designated Western Employment Area. Consider it a site in retail use, on the periphery of Employment Area that should be treated the same as Beneficial House and prior approvals to the west of the site (proposed for removal). Also summarised under LP25.
653 Thakeham Homes	Submitted a site near Binfield in Wokingham BC for consideration by BFC. Would like BFC to consider amending approach to how defines its settlement boundaries, Binfield in particular. Should adopt a cross-border approach.
691 Syngenta	We support the change to the Proposals (Policies) Map to amend the settlement boundary to include Jealott's Hill, Warfield.



## Comments on Non-allocated Sites

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY	None received.
RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS	<b>Residents comments on removal of sites in the previous Draft Plan</b>
015 Brown	<p><b>WINK22 - Land to south of London Road, east of Bog Lane and west of Swinley Road (Whitmoor Forest)</b></p> <p>Pleased that this site has been removed that agricultural land has been utilised over woodland/SSSIs. Delighted that the following constraints have been considered:</p> <ul style="list-style-type: none"> <li>• Groundwater flood risk</li> <li>• Climate change adaption</li> <li>• Biodiversity</li> <li>• Accessibility</li> <li>• Woodland</li> </ul>
032 Eustace	<p><b>WINK14 – Winkfield Row</b></p> <p>Pleased that area adjoining Braziers Lane has been removed which suffered a high water table</p>
080 Glover, 103 Smith, 268 Westbury, 283 Baker, 308 Sones, 449 Higgins, 483 Baloch, 648 Clark, 930 Wallace	<p><b>BIN6 – land south of Emmets Park and east of Cressex Close</b></p> <p>Support removal of the site.</p> <p>Various reasons cited in some representations, including:</p> <ul style="list-style-type: none"> <li>• Need to keep Binfield and Bracknell separate.</li> <li>• No suitable highway access.</li> <li>• Sight lines not adequate.</li> <li>• Bottom of field floods, particularly in winter.</li> <li>• Surface water flooding.</li> <li>• Slope of site means existing homes will be overlooked.</li> <li>• Loss of landscaping, mature/protected trees and wildlife.</li> <li>• Grassland has characteristics of lowland meadow UK priority habitat (where is land to offset any loss).</li> <li>• Elevated position of site would dominate the visual landscape.</li> <li>• Presence of protected trees.</li> </ul> <p>Other comments:</p> <ul style="list-style-type: none"> <li>• The site should be considered as greenspace/open space for the benefit of the village and wildlife.</li> </ul>
280 Runham, 483 Baloch	<p><b>BIN6 – land south of Emmets Park and east of Cressex Close</b></p> <p>Concerned that the site may be included at a later date, if BIN5 approved. Been previously misled about land staying as SANG.</p>
268 Westbury, 305 & 306 Shrimpton, 400 Mulroy, 437 Ketley, 445 Farthing, 578 Marriott, 447 & 599 Leary, 600 Apoux, 795 Osbourn, 804 Jacobs, 813 Gray	<p><b>BIN6 – land south of Emmets Park and east of Cressex Close</b></p> <p>Also objections to inclusion of site BIN6 (even though not proposed for allocation).</p> <p>Various reasons cited in some representations, including:</p> <ul style="list-style-type: none"> <li>• Impact to wildlife/biodiversity</li> <li>• Flood risk</li> <li>• Visibility of site due to elevation</li> <li>• Lack of access</li> <li>• Used as open space by local residents, sledging, walking, dog walking</li> <li>• Increased traffic</li> <li>• Loss of open space</li> <li>• Impact to local facilities</li> <li>• Would not result in housing which is affordable for the community</li> <li>• Protected trees/clearance of trees</li> <li>• Other better sites available</li> <li>• Noise pollution</li> <li>• Impact to landscape/rural character</li> <li>• Overlooking to existing properties</li> <li>• Previously assured that land would remain as open space</li> </ul>
026 Buffet	General support for the Plan, due to removal or large and inappropriate sites from South Winkfield.

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
417 Murphy	Dropping allocations in Winkfield is welcome to prevent adding to impact of ongoing SA development on the road network in east Bracknell and beyond.
	<b>Residents comments on other sites</b>
026 Buffet	Current planning application north of London Road near Martin's Heron for 81 houses which will cause congestion and accident risk on London Road. Should not be approved.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
	<b>Developer/Promoter comments on removal of sites in the previous Draft Plan</b>
297 Terence O'Rourke Ltd on behalf of Bracknell Land Ltd and Tingdene Parks Ltd	<p><b>BRA3 – The Hideout</b></p> <p>This version of the Plan removes the land at the Hideout, which is well relates to Beaufort Park, principal reasons appear to relate to climate change, flood risk and lack of a need for this site to meet overall housing requirement:</p> <ul style="list-style-type: none"> <li>• Response to housing requirement summarised under section 6.1 (rep 299).</li> <li>• Climate Change &amp; Flood Risk: the Housing Background Paper refers to ground water emergence across 74% of the site, with high ground water levels (19%) on further areas, with surface water flood risk co-occurring in some areas (191%). Stantec have reviewed the report, and it appears that the only differentiation between the Beaufort site (proposed for allocation) and the Hideout relates to groundwater modelling. JBA (acting on behalf of the Council) acknowledge that ground water modelling should not be used as a sole evidence for land use planning. Therefore, it is unreasonable for the Hideout to not be allocated on this basis. Stantec has undertaken on-site monitoring for both sites and there are discrepancies between their data in February 2019, and the results shown on the JBA and GeoSmart models. Stantec will be undertaking further work, which will be shared with the Council.</li> <li>• Ecology: Whilst the site does have areas of ecological interest, the Council has not given weight to existing lawful development certificates granted in 2018, which collectively confirm the existence of an implemented permission for development of as many residential units as may be sited and licenced within the 2ha of the site. There is also no reason why ecological net gain could not be achieved through development of the Hideout land (which is acknowledged in the Housing Background Paper).</li> <li>• Landscape: The LUC report only takes account of landscape sensitivity. A significant omission of the local plan evidence base is the absence of an assessment of each sites visual amenity – no justification for this approach. This is considered to be an oversight, and relevant for parcels BRA3 and BRA4 as both sites are well contained, and development would give rise to limited adverse visual effects and any residual effects could be easily mitigated on site. This is not given any weighting in the final scoring of the site's landscape capacity.</li> <li>• Odour: Current discussions underway with Thames Water in respect of odour from the wastewater treatment works, and potential mitigation strategy. Need to note that the October 2019 appeal decision relating to the Beaufort Office sites, the issue of odour was not considered to be a significant planning issue constraining the development of the sites, and was dealt with by way of a planning condition.</li> <li>• Transport: a review of the 'Draft Transport Accessibility Assessment of Potential Sites (September 2018) has been undertaken (further detail set out in representation), which concludes there are no transport grounds for removals of the Hideout, with significant transport benefits associated with allocating alongside Beaufort Park (such as internal bus loop, increase viability for bus improvements).</li> </ul>
399 - Crown Estate	<p><b>WINK22 - Land south of London Road, east of Bog Lane and west of Swinley Road (Whitmoor Forest), Bracknell</b></p> <ul style="list-style-type: none"> <li>• Very sustainable location adjacent to the built-up area with excellent access to existing services, facilities and employment opportunities.</li> <li>• Flood Risk Assessment and Drainage Strategy submitted alongside representations. The FRA explains that, informed by the detailed groundwater monitoring and a cut and fill assessment, development parcels can be provided 500mm above groundwater contours, together with shallow attenuation basins and consideration of additional SUDS techniques (such as bio-retention swales, rain gardens, tree pits and rainwater harvesting). The FRA concludes that on this basis, the proposed development will remain safe from flood risk and can be suitably drained for the development lifetime.</li> <li>• Phase II Ecological Survey submitted alongside representations. Results reflect the previous conclusions - the site supports a range of faunal species, but, the location and extent of areas with greatest ecological value largely coincide with areas of the site that would not be developed.</li> <li>• Nothing has changed since the site was proposed for allocation to justify extension of the Strategic Gap to incorporate the site at Bracknell East. LVA submitted alongside representations.</li> <li>• The site has capacity to accommodate at least 450 new homes, together with SANG, a primary school, community hub, playing fields and open space.</li> </ul>
654 Boyer on behalf of Nicholas King Homes	<p><b>WINK12 (forms part of WINK14) Land to rear of 89 Locks Ride, Ascot</b></p> <p>Consider site logical infilling and should be allocated following grant of permission for 17/00160/OUT. Land wholly associated with 89 Locks Ride. Land immediately west also granted planning permission 16/01153/FUL and is under construction. Land being promoted physically and contextually same as both other sites which it abut to east and west.</p> <p>Has good defensible boundaries and hedge/ tree buffer to north. Would be sustainable location. Medium allocation (less than 1ha with 5 net dwellings or more) for suggested capacity 9 dwellings. Would not meet threshold for affordable housing.</p> <p>Previously assessed and considered appropriate for development as part of draft Policy LP6 – Land at Winkfield Row in Draft Local Plan Feb 2018.</p> <p>Unclear why land not now proposed for allocation and now proposed as a strategic gap.</p> <p>Site location plan and aerial photos submitted.</p>
886 Boyer on behalf of Bloor Homes Ltd	<p><b>BIN6 – land south of Emmets Park and east of Cressex Close</b></p> <p>Bloor have an option on both BIN5 and BIN6. Whilst the SALP indicated that these two sites would be SANG land, as Bracknell Football Club did not relocate to the site, the SANG was located elsewhere within the site. The Blue Mountain application significantly overprovides open space (c 4.5ha) within the red line area (excluding BIN5 and BIN6), therefore, sufficient</p>

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
	<p>open space to serve Blue Mountain together with BIN4 and 5. Principle of development has already been established through previous Local Plan. As the full quantum of development (400 units) were shown within the red line area and masterplan relating to application 16/00020/OUT), the quantum of development for BIN5 &amp; BIN6 needs to be re-confirmed through the new Local Plan. Also consider that an additional piece of land could link BIN5 and BIN6 together providing a link road and additional dwellings (map and vision document provided). The larger site would be capable of delivering c.193 dwellings (at 35dph).</p> <p>Specific comments relating to BIN6:</p> <ul style="list-style-type: none"> <li>• Consider the site could be re-considered for allocation, and settlement boundary amended to include site.</li> <li>• The site will have the benefit from the ability to utilise excess SANG capacity at Blue Mountain.</li> <li>• A developer is already operation on the wider site, so housing could be delivered early in the plan period.</li> <li>• Site is accessed off Emmets Park by an existing gate. Whilst there is a group TPO adjacent to the date, Bloor have retained the ability to access the site by removing an existing dwelling on the corner of the site adjacent to the site.</li> <li>• The site is within flood zone 1, so low risk of flooding. Small part of northern boundary is at risk, which could be fully mitigated by a SuDS scheme.</li> <li>• No statutory or non-statutory nature conservation designations for the site.</li> <li>• The site is in a sustainable location.</li> <li>• Housing demand within Bracknell Forest is high, and the Borough have been underdelivering for several years. Retaining the allocation of this site would allow for much needed homes to be built, as part of a logical extension of Blue Mountain and Binfield.</li> </ul> <p>Comments on Housing Background Paper relating to the site:</p> <ul style="list-style-type: none"> <li>• Landscape: In response to the Landscape Assessment comment “Development of the site could fit relatively well in relation to the existing settlement pattern and form a natural extension to Binfield but only if designed to retain the valued features such as the clusters of trees on the boundary of the site.”; a detailed design would be assessed by the Council at planning application stage. From a landscape perspective, this assessment demonstrates that the development would not have an adverse impact.</li> <li>• Heritage: The Heritage Assessment noted that “the level of potential effect is low with development unlikely to cause changes in the setting of any local heritage assets”. Therefore, this is not a constraint for the re-allocation of Bin 6</li> <li>• Drainage: The Strategic Flood Risk Assessment indicates the site is located within Flood Zone 1, and 14.5% at risk of surface water flooding. The site should not be excluded from an allocation o as a result of the small area at risk from flooding, which can be mitigated and managed through the application process.</li> <li>• Transport: The Strategic Transport Assessment states financial contributions would be required towards capacity improvements and improvements to footways/cycleways. The additional area of land to link BIN5 and BIN6 would provide the opportunity to connect the sites to Forest Road, and create a direct link to Wood Lane. The Accessibility Statement confirms there is good access to education and employment. The site is within walking distance of Binfield Surgery and local bus to Bracknell Healthspace.</li> <li>• Ecology: The Ecology Assessment states that the site is predominantly neutral grassland with small areas of scattered scrub, and is not subject to any nature conservation designations. Hedgerow retention could be discussed as part of any future application. The area of Ancient Woodland is 15m from the site boundary in line with Natural England’s advice for buffer zones, therefore not a constraint.</li> </ul> <p>(Specific comments relating to new piece of land are summarised under 'non-allocated' sites, and comments under BIN6 are summarised under section 6.2 relating to sites proposed for allocation).</p>
	<p><b>Developer/Promoter comments on other omission sites</b></p>
218 & 224 Napper	<p><b>WINK19 – Land between London Road &amp; Longhill Road</b></p> <p>Response from owner of site.</p> <p>Site suitability assessment refers to the residual area being too small (5 dwellings) which is incorrect. The clear area is c.2000sqm. Within it, the area without trees or TPO is 1,525sqm, which could accommodate 5 dwellings with a density of less than 35dph.</p> <p>The access road could also provide access (should the owner wish) to the garden of Claverton, which could accommodate a 3 houses.</p> <p>It could also (if the owners wish) provide access to the rear of house on the south side of Church Road, which would solve longstanding parking problems.</p>
481 Solve Planning on behalf of Home Farm Land Ltd	<p><b>WAR23 – Land adjacent to Home Farm, Forest Road, Warfield</b></p> <p>Land is available and deliverable (as demonstrated by fact site is currently at a Public Inquiry – outline application for 197 dwellings). Settlement boundary should be amended to accommodate the site – which is located next to the settlement boundary created by the strategic development at Warfield – Woodhurst Park. (Other sites located adjacent to settlement boundaries are being amended such as BIN1, BIN5, BIN10, SAND5 and WAR9).</p> <p>The Landscape Appraisal for the site identifies Home Farm as medium sensitivity which is comparable to SAND5 and Bin1 which are proposed for allocation.</p> <p>Site is accessible to local facilities, and in easy reach of Bracknell Town Centre.</p> <p>Site should be included as an allocation (reference also made to previous representations made relating to the site).</p>
503 Strategic Planning Research Unit on behalf of Hawkbury Homes Warfield Ltd	<p><b>WAR8 - Land between Newell Hall and Cuckoo Cottage, Warfield Street</b></p> <p>Site is 0.55ha and is proposed by Hawkbury Homes (who have an interest in the land) for development of a care home facility.</p>

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
	An outline application has been refused (19/00632/OUT). Despite refusal, consider the site remains an appropriate location for a care home facility, and should be allocated to meet the Borough's need in relation to C2 uses.
507 Hawksbury Homes	<p><b>WAR8 - Land between Newell Hall and Cuckoo Cottage, Warfield Street</b></p> <p>Plan's reliance on windfall sites for delivery of C2 is not sufficient. Land to the East of Newell Hall (site WAR8) should be included as an allocation in the Local Plan for older persons accommodation (Use Class C2). It is suitable, available and deliverable.</p>
566 Nexus Planning on behalf of Kingacre Estates	<p><b>WAR18 – Forest Farm, Forest Road, Hayley Green</b></p> <p>Site is in control of Kingacre Estates (Vision document relating to the site also provided with representation).</p> <p>Following points made:</p> <ul style="list-style-type: none"> <li>• The site is available.</li> <li>• It is sustainably located.</li> <li>• There is a blanket TPO at the southern part of the site, which is to be retained.</li> <li>• The Phase 1 Ecological Survey undertaken on behalf of the Council provides an indication of likely fauna on the site. Relevant survey work can be undertaken to confirm this and will provide suitable mitigation.</li> <li>• A landscape assessment would be carried out in support of a planning application, and measures implemented to mitigate the impact of development.</li> <li>• The Heritage Assessment undertaken on behalf of the Council concludes that archaeological potential is unknown and pre-determination work will be carried out in support of a planning application.</li> <li>• A flood risk assessment and drainage statement will be prepared and submitted in support of any planning application.</li> <li>• Noise and air quality assessment will be submitted as part of the application package. Appropriate buffers will be retained to ensure that the level of noise and air quality enjoyed by future residents is of a suitable standard.</li> </ul> <p>The SHELAA considers the site and suggests it is greenfield rather than previously developed land. However, the site includes residential land outside the defined 'built up' area. In line with High Court judgement (Dartford Borough Council v Secretary of State for Communities And Local Government &amp; Anor [2017] EWCA Civ 141), this makes clear that the term 'previously developed land' as defined in the NPPF glossary includes private residential gardens in areas which are not 'built up', therefore the site, in part is demonstrably previously developed.</p> <p>As the Council acknowledges that developed needs cannot not be met entirely within the urban area, it should prioritise previously developed sites in sustainable locations, such as this.</p> <p>Consider that the site should be allocated for c.35 dwellings (including affordable), and Policies Map amended to reflect the change.</p>
573 & 576 Woolf Bond Planning on behalf of Warfield Park Homes	<p><b>WINK17 – Chavey Down Farm, Longhill Road</b></p> <p>Site is in control of Warfield Park, containing house and commercial stables, therefore considered to be part of a previously developed site.</p> <p>Site should be allocated and would meet the aims of NPPF para. 61, through provision of park homes which meet the needs for different groups in the community including for older people.</p> <p>Object to the inclusion of the site within a proposed gap designation – not appropriately justified.</p> <p>Site is an accessible location for development, located adjacent to land already benefiting from residential permission, offers potential for highway improvements, and is partly PDL.</p> <p>The full extent of Warfield Park Homes estate should be included in the settlement boundary for Bracknell, to reflect established residential status of the site through planning permissions.</p> <p>The site should be excluded from any strategic gap.</p> <p>Should be allocated for c. 60 dwellings.</p>
593 Woolf Bond Planning on behalf of JPP Land Ltd	<p><b>BIN17 - Land north of Tile House and Honeysuckle Cottage, Tilehurst Lane</b></p> <p>Would form a logical area of development between two approved schemes allowed on appeal (BIN1, approved for 40 dwellings and BIN2 approved for 53 dwellings). Therefore comments in Housing Background Paper (page 308) relating to "would not be an urban extension to a settlement, rather it would be an isolated site, poorly related to the rest of the settlement of Binfield. The site would protrude into open countryside that is important to the setting of the village" do not reflect the approval of the appeal schemes.</p> <p>Should be allocated for c. 9 dwellings.</p>
656 Simmons and Sons	<p><b>Land adjacent to Jealott's Hill site</b></p> <p>Consider that field (forming triangle of land south of Lordlands Farm, north of Ascot Road) should be included as part of the allocation for either housing, infrastructure of leisure. (Plan provided with representation).</p> <p>(Also summarised under Jealott's Hill)</p>
692 Woolf Bond Planning on behalf of JPP Land Ltd	<p><b>WINK18 - Whitegates, Longhill Road</b></p> <p>Site is control of JPP Land Ltd.</p>

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
	<p>The assessment of the site in the Housing Background Paper discounts the suitability of the site, but permission has since been granted on appeal, it should be allocated for c. 13 dwellings.</p> <p>The site should be regarded as part of the wider extent of the Warfield Park Mobile Homes residential areas, and be included in the settlement area of Bracknell.</p>
728 Landsec	<p><b>The Peel Centre/Point</b></p> <p>Needs to include the site within the mixed-use allocations. In a sustainable area and has potential for residential as part of mixed use development. Could theoretically meet approximately 2 years of Councils identified housing requirement. Deliverable within the short to medium term.</p> <p>Site is currently relatively low rise and dominated by hard-standing and small buildings - not optimizing its potential in view of its Town Centre location. Could further strengthen the mix, sustainability and offer within the central town centre.</p>
801 Progress Planning	<p><b>Land adjacent to SAND9</b></p> <p>Developer of SAND9 has also secured interest in the adjacent site (map provided with representation) which should be considered as an addition to the development. Suitable buffers could be provided to preserve the amenities of adjoining residential occupiers. The site is deliverable within five years.</p> <p>(Also summarised under SAND9).</p>
886 Boyer on behalf of Bloor Homes Ltd	<p><b>Land linking BIN5 and BIN6</b></p> <p>Addition of the land between BIN5 and BIN6 would mean a single point of access for the combined site from Forest Road (as an alternative to accessing BIN6 via Emmets Park).</p> <p>Land forms part of the current golf course which was redesigned following closure of wider Blue Mountain Golf Course. Removal of a strip of land from the golf course would have minimal impact and not affect the use of the golf course. If allocated, the northern area of the golf course could be adjusted to allow the holes to be re-located.</p> <p>Design Vision document provided with representation.</p> <p>Site is 2.1ha and has capacity for 74 dwellings at 35dph (or 193 homes across the larger combined site including BIN5 and BIN6).</p>
893 Persimmon/Souter	<p><b>Land at Cabbage Hill (WAR4 and WAR5)</b></p> <p>Strategy is supposed to be based, first and foremost, on development which is well-related to Bracknell Town. This can be achieved by locating housing on south flank of Cabbage Hill – see submission to SHELAA for 150 dwellings and 13ha for open space plus elevated land as green space.</p> <p>Housing Background Paper is based on the incorrect assumption that the whole 18ha is to be developed. Better site than (i) Hayley Green (ii) South of Dukes Ride and (iii) Beaufort Park. Inclusion of Jealott's Hill is not justified. If Jealott's Hill is to be backed, suggest that the resulting loss of Green Belt land be made up, in part, by the use of the Hayley Green site as compensatory Green Belt.</p>
901 Shanly	<p><b>Additional land related to WINK34 - Palm Hill Extension (SA3), London Road</b></p> <p>Support the extension of SALP site WINK 34. Wish it to be extended further to reflect landownership and boundary of submitted planning application 19/00847/OUT for 81 dwellings – map submitted.</p>
989 Penfold	<p><b>Land adjacent to Pinewood Park</b></p> <p>Confirmed that land is available for a small development of affordable homes for over 50s.</p>
991 Boyer on behalf of W J Channing and Sons (Woking) Ltd Minstead Ltd and Markfield Ltd	<p><b>WINK30 - Land at the Rough</b> (including Pineways, The Victory and 32-42 New Road, Ascot)</p> <p>Whilst the site falls within land parcel B20 of the 'Green Belt Review' (Amec, June 2016) which sets out the parcel makes a contribution to the Green Belt, this does not provide an accurate assessment of the Rough as an individual site which ends to be considered on its own merits rather than groups with a larger area of land. Considers that the site meets the five purposes of the Green Belt contained in the NPPF:</p> <ul style="list-style-type: none"> <li>• To protect the unrestricted sprawl of large built-up area. The site is contained by residential development on three sides and is in a pocket of inaccessible land in a built-up area. Development of the site would not result in unrestricted sprawl of the urban area, and would result in a logical rounding off site, strengthened by trees on the western boundary.</li> <li>• To prevent neighbouring towns merging into one another. Development of the site would not extend any further west of the existing residential development to the north and south. Retention of trees along the western boundary would visually contain the development, so no visual coalescence would occur with Winkfield Row to the west.</li> <li>• To assist in safeguarding the countryside from encroachment. An amendment of the Green Belt boundary to follow the western boundary of the site would create a defensible boundary to the Green Belt which could be supported by the retention of a strong mature tree belt along this boundary.</li> <li>• To preserve the setting and special character of historic towns. Residential development on The Rough would be within an area which has a general suburban character and would not therefore have any impact on the setting and special character of a historic town.</li> <li>• To assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Although development of The Rough would not assist in meeting this purpose of the Green Belt, the scale of development likely to be proposed on the site would not materially reduce pressures to develop derelict and other urban land within the authority.</li> </ul> <p>Consider that release of Green Belt should be in locations which are close to settlements and reasonable distance to transport connections – the Rough is just north of Ascot High Street and north-west of Ascot train station.</p>

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
655 Spitfire Bespoke Homes Ltd	<p>Due to exceptional housing need in Bracknell Forest, The Rough is an alternative site to Jealott's Hill which can deliver in the short term if site is released (see separate summary comments in relation to land at Jealott's Hill).</p> <p><b>Wyevale Garden Centre, Forest Road (BIN4)</b></p> <p>Site acquired in 2018 – in single ownership and is available and deliverable in the short term. Retail use no longer viable – redundant PDL site that is sustainably located. Context of site has changed since SHELAA assessment was undertaken due to development proposals at Blue Mountain and Tilehurst Lane. Spitfire made a presentation on the proposed redevelopment to Binfield Parish Council on 28 August 2018. Members of the Parish Council considered this to be a suitable site for residential development.</p> <p>Majority of trees can be retained, flood risk and impact on heritage assets is capable of being mitigated as part of any application. BFC refused planning permission in May 2019 due to the site's location beyond the settlement boundary, considering it would have an adverse impact on the character of the area. There were also reasons for refusal in relation to the flooding and drainage, however, BFC and the Environment Agency have subsequently confirmed that the drainage position and proposed SuDS scheme would be acceptable. There were also reasons for refusal relating to the absence of a S106 agreement, which is being prepared in discussion with BFC and will be resolved through the planning appeal.</p> <p>On 5 August 2019 BFC determined a Certificate of Lawfulness, confirming that the lawful use of the site was Class A1 (shops) and was unrestricted with regards to the goods that could be sold. This means that the site is capable of coming into use at any time for any type of retail sales, without requiring planning permission. This could lead to significantly more traffic and impact on the character of the area than a residential use.</p> <p>It is proposed to extend the settlement boundary to include Land north of Tilehurst Lane, Binfield. In addition, planning permission was recently granted at appeal for two sites north of Tilehurst Lane (Land north of Tilehurst Lane and west of South Lodge and Land at Tilehurst Lane) for a combined 93 dwellings. Once these developments are built out, and with the Land north of Tilehurst Lane allocation, the line of development to the north of Binfield will be extended to be in line with the former Wyevale Garden Centre. Extending the settlement boundary to incorporate the former Wyevale Garden Centre within the settlement would make a logical extension. Capacity of site has been tested through the application process and up to 29 dwellings could be achieved on this site, along with landscaping, car parking and open space.</p> <p>Draft Policy LP4 should be amended to include the allocation of the former Wyevale Garden Centre for up to 29 dwellings.</p>
565 Turley on behalf of Berkley Strategic Land Ltd	<p><b>BRA1 Land at Parkview Farm, Old Wokingham Road</b></p> <p>The proposal is for a mixed use development comprising housing, retirement village, community facilities (including a local store, café, event space, medical centre, school, residents cinema / gym), employment land (including The Enterprise Hub) and 45 acres of accessible green space (which includes for areas for play, outdoor classrooms, picnic areas, formal open space, allotments, food growing) and SANG.</p> <p>The site is more sustainable than proposed allocations at Jealott's Hill and Beaufort Park and is clear and reasonable alternative in accordance with the spatial strategy and should be allocated. A number of technical documents, which demonstrate that the site is free from constraint and meets the availability, suitability and deliverability tests referred to in paragraph 67 of the NPPF (2019) are attached:</p> <ul style="list-style-type: none"> <li>• Transport Strategy Technical Note;</li> <li>• Landscape and Visual appraisal (February 2019);</li> <li>• Preliminary Ecological Review (June 2019);</li> <li>• Biodiversity Gain at Parkview Farm, Bracknell, Berkshire (June 2019);</li> <li>• Built Heritage Assessment (March 2018),</li> <li>• Heritage Rebuttal Statement (March 2018);</li> <li>• Built Heritage Assessment Addendum (February 2019);</li> <li>• Archaeological Desk Based Assessment (March 2018).</li> </ul> <p>The site should be allocated for the following reasons:</p> <ul style="list-style-type: none"> <li>• In proximity to community facilities and employment;</li> <li>• Site is in a highly accessible location with strong connections to the strategic road network; 3km from Bracknell Railway Station and Crowthorne Station.</li> <li>• Well related and connected to Bracknell;</li> <li>• In a more sustainable location than other sites in the Local Plan;</li> <li>• The proposed development (masterplan attached) seeks to provide self-sustaining and mixed use community with potential pedestrian and cycle links into Jennett's Park and employment opportunities;</li> <li>• Located within 400-5km buffer zone for the Thames Basin Heaths SPA;</li> <li>• No conservation area within or immediately surrounding the site. Nearest heritage asset more than 400m from the eastern boundary;</li> <li>• Acknowledge that a portion of the 'Adjacent to Wokingham Road/Peacock Lane Local Wildlife Site' is within south west corner. Site provides an opportunity to protect and enhance the site;</li> <li>• Long Meadow Coppice (ancient woodland) to the north west of the site. The design of the proposal would provide an appropriate buffer;</li> <li>• Capable of achieving 11% net biodiversity gain;</li> <li>• Majority of site in Flood Zone 1;</li> <li>• Site and surroundings are not designated for landscape.</li> </ul> <p>Consider site is deliverable without resulting in unacceptable coalescence between Bracknell and Wokingham as demonstrated by the Landscape and Visual Appraisal (report attached). A separation distance between the two settlements would be retained if the site was allocated which would be greater than that retained by the narrowing the gap between Bracknell and Crowthorne than a site currently being proposed for allocation in LP4 to the south of BRA1. Development of the South Wokingham SDL and development of land at Parkview Farm, will ensure a retention of a significant gap between the settlements.</p>

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
Michael Williams Planning on behalf of Schyde Investments	<p><b>Land north side of Bowyer's Lane (Moss End)</b></p> <p>Existing Moss End Garden Village/garden centre is a successful out of centre facility, therefore LP10 should be expanded to include the Moss End Facility as a local centre.</p> <p>Land north of Bowyer's Lane fulfils objectives in relation to meeting short-term housing requirements. Site should be released from the Green Belt alongside Jealott's Hill.</p> <p>No reasoned arguments with BFC documents for the exclusion of Schyde land, it appears that it simply falls outside the Taylor Wimpey controlled land.</p>
Bewley Homes	<p><b>SAND 8 - Eagle House Field, Crowthorne Road, Sandhurst</b></p> <p>Site is being promoted by Bewley Homes, a national housebuilder with an excellent record of bringing forward applications, and subsequently building sites out, in a timely manner. Wish to bring forward a high-quality scheme for much-needed older persons' accommodation (SHMA needs assessment is based on outdated evidence). Plan should be allocating sites for older people.</p> <p>Sustainable location for a C2 residential care facility. Located on the edge of the built-up area of Sandhurst, which provides a range of local facilities.</p> <p>Site should be removed from countryside designation. Development would have no adverse impact on character and appearance of area. Recent appeal (APP/R0335/W/18/3206527, decided 29 October 2019) concerned the effect of development on the character of the Bracknell/Crowthorne Strategic Gap. The implications of this are that development of a care home on the promoted site will not have a material impact on the character or appearance of the gap between Sandhurst and Crowthorne, or on the function of the gap in terms of the physical and visual separation of settlements.</p> <p>Site consists of lower-quality ecological and habitats environment. The housing estates at the edges of the landscape introduce suburban features and lighting that reduce the natural qualities associated with the woodland and heathland. Site is enclosed by trees that screen it from view.</p> <p>As part of a previous application/appeal on this site (12/00507/FUL), an ecological and hydrological assessment has been carried out, which demonstrated that water flows can be suitably accommodated across the site at the same levels after development and that the chemical quality would be unchanged</p> <p>No issues preventing the site from being adequately serviced.</p>
	<p><b>Developer/Promoter comments on other sites outside the borough</b></p>
653 Thakeham Homes	<p><b>The White Cottage, Forest Road Binfield</b></p> <p>Site situated in administrative boundary of Wokingham BC, but is physically and perceptually tied to Binfield. Concern that the site should be considered by BFC through joint working and in draft Local Plan since part of Binfield. Unclear extent of joint working and "further work... potential cross boundary sites" referred to in West of Berkshire Spatial Framework (para. 36) has taken place in preparation of Local Plan.</p> <p>Site considered to be available, suitable and achievable. Could be delivered in first 5 years of plan period.</p>

## **APPENDICES**

### **A1 Summary of LP Evidence Base (Housing Background Paper)**



NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY	
556 Warfield Parish Council	WPC expects to see a commitment to the provision of a community Landshare with an orchard as part of the proposals for any garden village.
RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS	
415 Murphy	<p>Page 226 onwards. Cluster 7, Warfield NP allocation:</p> <ol style="list-style-type: none"> <li>Note some studies have been updated and some not. Repeat Feb 2018 comment that a few studies were hampered variously by some inaccurate information, being asked to draw conclusions beyond what was scientifically reasonable, or limitations of remit. New studies included here and further surveys done at appropriate times of year and drawing on new available evidence and requirements will presumably inform future opinion.</li> <li>The updated section includes in places a site to the west (WAR12), which is not in the allocation. It is referred to only in the evidence base and it is not explained why this (non NP, non BFLP Feb 2018) site was assessed and included here. It will come as a surprise to residents.</li> <li>Land to the east and west of Hayley Green represents settlement gaps (separating Winkfield Row to the east and Warfield Street to the west). The rural edge and open countryside all the way to Maidenhead are to the north, as OS maps indicate.</li> </ol>
415 Murphy	<p>Page 241 onwards. Appendix D, LP 7. As noted in comments on LP 7, no evidence is presented in original evidence documents or in this summary paper to support removal of Land at Jealott's Hill from the Green Belt and its allocation for 4000 homes. The evidence tells a consistent story. The Green Belt study, Landscape assessments, Heritage assessments, and Strategic transport and Accessibility assessments describe its isolated, rural location, its significant contribution to Green Belt purposes, and the value of the heritage assets and unspoilt farmland rural landscape. They all support the conclusion in the Feb 2018 Plan version that it should not be allocated. In this Plan new strategy, allocation is argued on the basis of 'global importance of work carried out by the owner of the site' and 'Development on site would provide necessary investment and facilities'. No evidence is provided for this. In terms of evidence then, nothing has changed to support discarding the Feb 2018 conclusion, or the current proposal to remove the site from the Green Belt and allocate it for 4000 homes. The summary identifies the key constraints: "Chiefly, this large site is located in an area of rural character in an elevated position, and development on-site has the potential to have a medium-high effect on the both the surrounding landscape and the landscape within the site. The site also contains listed buildings, with further listed buildings being in close proximity of the site. Lastly, the requirement to increase the capacity of the highways linking the site to other destinations could have an urbanising effect on roads that are currently rural in character."</p>
921 R Wallen, 862 C Wallen	<p>Appendix D covering WAR3 Page 243 states:</p> <p>"The site is within the Green Belt and contributes to all five purposes of the Green Belt, the most significant contribution being 'assist in safeguarding the countryside from encroachment'.</p> <p>How can it be concluded that it is acceptable to remove the site from Green Belt?</p>
862 C Wallen	<p>Inconsistencies between this report and the details in LP7, specifically –</p> <ul style="list-style-type: none"> <li>- Number of dwellings</li> <li>- Number of schools</li> </ul> <p>Para 4.3.7 makes no mention of provision of a community landshare with orchard. Ideally the Landshare would remain in its current place to secure the future of the 450 tree orchard and minimize disruption to users. Orchards are a priority item in the current BF Biodiversity Action Plan.</p> <p>Several BFC documents refer to the Landshare as 'Community Allotments' (example Appx 5 – WAR3 in the SHELAA Part 2 results pg 124). The site is not just allotments as it is a more varied and valuable resource than allotments. Please ensure all documents refer to it correctly.</p> <p>Appendix D WAR3 site - no evidence is presented in evidence documents or in this summary paper to support removal of Land at Jealott's Hill from the Green Belt and its allocation for 4000 homes. The Green Belt study, Landscape assessments, Heritage assessments, and Strategic transport and Accessibility assessments describe its isolated, rural location, its significant contribution to Green Belt purposes, and the value of the heritage assets and unspoilt farmland/rural landscape. All support the conclusion in the Feb 2018 version of the Plan that it should not be allocated.</p> <p>Site is in Flood zone 1 which may be a risk. Does not pass the sequential test.</p>
DEVELOPERS / PROMOTERS OF SITES	
593 JPP Land	<p>BIN17 Tilehurst Lane: Although the assessment of the site in the Council's Housing Background Paper (October 2019) (page 304) acknowledges that the site submission indicated that access was to be provided through the adjoining land off Tilehurst Lane site allowed on appeal (LPA ref 15/00452/OUT), it indicates (page 308) that it "would not be an urban extension to a settlement, rather it would be an isolated site, poorly related to the rest of the settlement of Binfield. The site would protrude into open countryside that is important to the setting of the village". However, this appraisal is not considered to reflect the changes that will arise through implementation of the appeal scheme (outline application for 28 dwellings allowed on appeal). The layout is provided.</p>
766 Wilson Developments	<p>BIN12:</p> <ul style="list-style-type: none"> <li>- site is well enclosed, therefore landscape sensitivity of the site should be 'low', not 'low-medium'.</li> <li>- Under 'Strategic Transport Assessment', wording should be revised to make clear that any financial contributions towards off-site highway measures will be considered further at the planning application stage. Revise wording to: "A transport assessment of the site has shown that financial contributions would be required towards the following offsite highway works however the details and extent of these contributions will be considered further at the planning application stage."</li> <li>- Under 'Green Infrastructure', no reference is made to open space at Amen Corner North, which would be within walking distance.</li> <li>- In the Appropriate Assessment it is noted that SANG would be achieved by a financial contribution towards the Piglittle Field SANG at Amen Corner North, which was secured by our client. This represented an over-provision of SANG. The extent of the financial contribution should be considered at the planning application stage.</li> </ul>

565 Turley on behalf of Berkeley Strategic Land Ltd	<p><b>BRA4 Beaufort Park</b> Identifies a number of issues and constraints that need to be taken into account. Site forms a physical and visual separation between Crowthorne and Bracknell. Oil pipeline restricts development along southern boundary. Not clear what the impact of the pipeline, need to retain plantation woodland across the south of the site and heathland and woodland habitats will have on capacity or developability.</p> <p>Other alternative sites available.</p> <p>(Comments made with reference to Parkview Farm, BRA1)</p>
565 Turley on behalf of Berkeley Strategic Land Ltd	<p><b>BRA1 Parkview Farm</b> Consider that the findings are not fully representative of the potential effects of development</p>
694 Syngenta	<p>Para 4.3.7 should refer to 3 new primary schools rather than 2, and development completion date of 2051.</p> <p>Response to exceptional circumstances set out under LP7.</p>

## A1 Summary of LP Evidence Base (IDP)

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY	
409 DfE	The IDP does not provide any estimate of cost for school provision as part of the Jealott's Hill development, and no viability assessment has been published as part of the evidence base accompanying this consultation. In DfE's opinion, this weakens the plan. The next iteration of should properly identify and incorporate education costs into a published viability assessment, to demonstrate that the plan has been positively prepared and is deliverable.
556 Warfield Parish Council	WPC is disappointed in the site-specific transport infrastructure information in the IDP. In addition to any capacity improvements to junctions, consideration should be given to the road network joining this junctions. The current road network in the area is already coping with additional capacity from the Warfield SALP and we do not believe this matter can be left until the planning application stage. We are very concerned that Highways England have not identified any site-specific requirements to the strategic road network, particularly because the site will have regional, national and international importance and will generate additional journeys to it, with some requiring further travel from train stations and airports.
RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS	
334 BBOWT	Section 4, IDP: sets out clear delivery schedules and timescales for OPPV, SANG, SAMM, biodiversity, green corridors, flood management and drainage. WAR 2 (Jealott's Hill) is only place where specific biodiversity net gain percentage is set out. A specific target for each development or allocation should be set.
023 McNab	<p>Various typographic errors</p> <p>P35, 3.07 table 7 "Police" "ducking" should be "ducting"</p> <p>"publically" should be "publicly" in these boxes  P22 - What are SANGs? – last line  P53 – Top line of boxes. middle box  P63 – Top line of boxes. middle box  P72 – <i>Suitable Alternative Natural Greenspaces (SANGs)</i> – middle box, item 3.  P74 – Top line of boxes. right hand box  P83 - <i>Suitable Alternative Natural Greenspaces (SANGs)</i> – middle box, item 3.</p> <p>For consistency "council" should have capital C. in these boxes  P24 – Demand and need  P24 – How is provision secured?  P31 – Table 6 (twice)</p> <p>Possessive - Councils should be Council's in these boxes  P28 – How is provision secured?  P29 – How is provision secured?  P33 – How is provision secured?  P33 – Demand and need  P34 – How is provision secured? (twice)  P53 – Third line  P56 - <i>Primary Health Care Infrastructure</i> '  P63 – First box, 7th line  P63 – Bottom left box, Bottom line  P85 – <i>Libraries infrastructure</i> Middle box  P85 – <i>Affordable Housing</i> - Left box</p> <p>Use of "Council are" instead of "Council is" in these boxes  P76 - <i>Primary Health Care Infrastructure</i>  P85 – <i>Libraries infrastructure</i> Middle box  P56 - <i>Primary Health Care Infrastructure</i></p> <p>P26 – Top Box – text reads "JBA Consulting on behalf of Bracknell Forest Council have produced". This should read "... has produced"</p>
152 & 448 CVAG	<p>1. Omissions in the overall IDP document</p> <p>1a. Contents section should be expanded. 7 lines deal with pages 1 - 12, pages 13 to 48 covered by 1 line. The 4.01 sections War3, Bra4 and Sand5 on pages 49, 59 and 69 should be identified in contents. General Infrastructure Delivery Schedule should also be identified and called section 4.0.2.</p> <p>1b. Term "BFLP strategic sites" should be defined.</p>

152 & 448 CVAG	<p>2. Broadmoor Hospital - IDP page 38 3.0.8 Table 8 Broadmoor Hospital should not be included in this Infrastructure Category because its services are not available to the general or local public.</p> <p>IDP page 91 <i>“Mental Health Infrastructure”</i> – Part of the General Infrastructure Delivery Schedule table – under “1” (Who (Delivery Organisation)) The same comment applies here. WLMHT has no responsibility in Bracknell Forest other than Broadmoor Hospital which is not available to local population.</p>
152 & 448 CVAG	<p>3. “Geographical Infrastructure” - Half of Crowthorne is in Wokingham Borough IDP does not recognise much of “Crowthorne” is in Wokingham Borough. Various Infrastructure Categories have different boundaries than BFC. For these categories, the effect that developments in Bracknell Forest Borough has on Wokingham Borough and vice versa must be clearly explained. Suggest an Infrastructure Category called “Geographical Infrastructure” to explain how settlements relate to and are affected by adjacent unitary authorities.</p>
152 & 448 CVAG	<p>4. Primary and Acute Health Infrastructures IDP at various points says “No site-specific infrastructure requirements have been identified by the [various] Health Care Providers” (Pages 56,57, 66,67, 76, 91,92 – associated with each of these is reference to using multi-functional community hubs). This is misleading as there will be a real need for additional health provision for local residents. A stronger plan should be stated so developers are aware of their responsibility to provide for health care of existing and incoming residents. Crowthorne PC have discussed with L&amp;G and BFC the planned community hub at Bucklers Park and a medical room has not been considered. It is difficult to get GPs in Crowthorne area due to high perceived cost of living. CVAG believes NHS should have a plan for the health future in Bracknell Forest and remarks in the IDP are not strong enough.</p>
152 & 448 CVAG	<p>5. Strategic Gap Strategic Gaps are vital parts of the infrastructure but the term does not appear in the IDP and it should do. CVAG is desperately keen to ensure that the Strategic Gap between Bracknell and Crowthorne is preserved.</p>
152 & 448 CVAG	<p>6. Transport infrastructure - General In part 4 “BFLP Infrastructure Delivery Schedules”, the IDP indicates sums of money to improve transport infrastructure IDP should give guidance on the extent to which developers should contribute to transport improvements.</p> <p>The IDP omits to point out severe constraints on transport infrastructure from developments in Wokingham Borough as well as BF. This particularly applies to the South Wokingham development south of the Wokingham to Bracknell railway line and to sites Bra 4 and Sand 5.</p>
152 & 448 CVAG	<p>7. Transport infrastructure – Bra 4 It is likely (though not specifically shown in the IDP) that the only road from BRA 4 will be South Road. From South Road you can only get to the busy Nine Mile Ride or the private West Road past the golf course. South Road is narrow. Is it also private? (we are unable to find out from Internet enquiries). This constraint makes Bra 4 unsustainable. A road from Bra4 direct onto Nine Mile Ride would disturb the strategic Gap between Bracknell and Crowthorne and also put more strain on the Nine Mile Ride.</p>
152 & 448 CVAG	<p>8. Utilities Infrastructure, Table 10 - Water Supply Infrastructure (Pages 41/42 ) The IDP section on Water Supply is weak Demand and Need section states “Bracknell Forest Borough is a water stressed area ... therefore new and existing developments must ensure they are connected to an above average water supply network at all times.” The IDP should indicate by what level water supplies should be “above average”.</p>
152 & 448 CVAG	<p>9. Charging Points for Electric Vehicles (EVs) The government intends that all cars sold after 2040 will be zero emission, which currently means that they will be electric. Therefore, every newly built property should have an EV charging point supported by a suitable power network within the development.</p>
152 & 448 CVAG	<p>10. Electricity Supply The IDP is ambivalent on this. It states “New housing and commercial growth in the borough would not have an adverse impact on NG’s electricity infrastructure provision”. CVAG is concerned about this as anecdotal suggestions are that, if all cars were electric, the national grid would not be able to cope. CVAG is pleased that IDP says “developers and local authorities should pay careful attention to new developments’ potential impact on this network”</p>
152 & 448 CVAG	<p>11. Air Quality The IDP is weak on air quality. It provides no responsibility on local authorities or developers to take necessary steps to address local air quality, which is dire in some areas, Guidance should be detailed in the following sections to make developers and planners really aware of their responsibilities 3.0.2 Transport Infrastructure 3.0.4 Green and Blue Infrastructure 3.0.8 Health Infrastructure - Table 8 Health Infrastructure - Public Health Infrastructure and The three site specific areas, War 3, Bra 4 and Sand 5 and The General Infrastructure Delivery Schedules starting on page 79</p>

865 C Wallen, 913 R Wallen	Page 49 – SRN improvements needed to A330 at Holyport/Braywick roundabout. There is no provision for this in the RBWM Local Plan. This is a highly congested road at peak times for access to M4/M40 and Maidenhead (Cross Rail future). BFC should comment on this in response to the RBWM local plan. 4,000 new homes plus existing housing developments to North Bracknell area will make this a critical improvement. Does not comply with NPPF p104b.
913 R Wallen, 852 C Wallen	No evidence of joint working with adjoining councils on infrastructure for roads. For example, scale of housing proposed at Jealotts Hill and Maidenhead Golf Course could add a large amount of traffic.
852 C Wallen	Adult and Community Learning Infrastructure (page 51) - landshare reference needs strengthening. As a condition of granting the development this must be retained in situ or re-provided with good transport links. Landshare provides a valuable facility for disadvantaged people and for volunteers and corporate responsibility.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
	No Comments received
<b>PROMOTERS OF SITE</b>	
	No Comments received
<b>PROMOTERS OF OTHER SITES</b>	
680 Quod on behalf of Legal and General Homes Communities (Crowthorne) Ltd (L&G)	Comments made in relation to the former Transport Research Laboratory (TRL) site, Old Wokingham Road, Crowthorne.  The Draft IDP for the Beaufort Park & Derby Field sites (Policies LP5 & LP6) include references to TRL site. L&G keen to ensure that reliance upon the former TRL site to provide infrastructure/mitigation of other sites is discussed and agreed at an early stage, and if appropriate, necessary financial contributions are identified to help secure this.  (Also summarised against Policies LP5 & LP6).
694 Syngenta	IDP only considers the plan period to 2036, but for Jealott's Hill, the infrastructure requirements for the whole development should be set out.  Specific comments on WAR3 delivery schedule: <ul style="list-style-type: none"> <li>• Transport: detailed cost estimates will need to be agreed in discussions with the Council however mitigation measures have been designed in an economically feasible manner. Should be noted their assessment of impact on roads did not identify the junction of the A3095/A330 as requiring improvements. Appendices contain cost estimates, have independently proposed a number of mitigation measures, which will need to be discussed.</li> <li>• Education: Page 51 details requirement for a single primary school, however three are identified in the proposal. A 2.2ha site is identified for a secondary school (safeguarded land), the Jealott's Hill proposal includes 6.75ha. The IDP should consider the requirements of the whole development, beyond the plan period.</li> <li>• Open Space: requirement for while development should be in eth IDP. Page 52 separates passive OSPV from SANG, despite the table on page 21 stating that OSPV can include SANG. Assessment should clarify that SANG can provide required OSPV, meaning no need for separate provision.</li> <li>• Biodiversity: Page 53 incorrectly refers to WAR3 containing 'traditional orchard' (a NERC Act Section 41 Priority Habitat Type).</li> <li>• Heritage: page 56 should be updated to refer to Hawthorndale as a locally listed building, and omit reference to White House.</li> <li>• Renewable Energy: Page 59 includes a listed of types of renewable energy. The IDOP should identify this is a list and the specific solutions for allocated sites will need to be considered on a site by site basis.</li> </ul>

## A1 Summary of LP Evidence Base (Appropriate Assessment)

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY	No Comments received
RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS	
333 BBOWT	<p>The appropriate Assessment identifies likely significant effects of the draft Plan on the integrity of the Thames Basins Heaths SPA in relation to human disturbance, recreational pressures and air pollution.</p> <p>Avoidance and mitigation measures for the first two are identified through exclusions zones for development, parking controls and alternative recreational land. Specific comments on adequacy of mitigation is set out in relation to specific sites (see separate summary comments).</p> <p>In relation to air quality, the AA finds that the integrity of all habitat sites has the potential to be adversely affected by air pollution, particularly nitrogen deposition and in-combination effects. Note that the air quality assessment is still in progress, and looks forward to results being made available.</p>
414 Murphy	<p>How are potential air quality impacts from SALP sites on the Windsor Forest and Great Park SAC being taken into account?</p> <p>Slight concern that the updated RBWM AA might not have considered the implications of the Supplementary Advice released in Jan 2019 with detailed guidance on Windsor Forest and Great Park SAC management. The original RBWM ecological assessment discounted, for example, young trees in the study area, species not recorded, and might or might not now be relevant habitat. It is to be hoped that any potential gap in RBWM work with respect to BFC's conclusions on in-combination impacts will have been dealt with by the BFC study.</p> <p>Accepting that a mitigation strategy (if needed) for air quality impact is work in progress, will it be possible to devise a generalised mitigation approach, analogous to the SANG approach for leisure impacts on TBH SPA, that will allow mounting impacts from disparate developments on allocated and windfall sites to be tracked and managed in-combination?</p>
DEVELOPERS / PROMOTERS OF SITES	
694 Syngenta	Para 1.9 refers to the old Bird's Directive (now codified as Directive 2009/147/EC).

**A1 Summary of LP Evidence Base (Sustainability Appraisal)**



NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
524 Binfield Parish Council	<p>Para. 1.24 – no definition of the abbreviation AA.</p> <p>Para. 1.25 – impact of the plan upon Air Quality is critical, impact of this is not yet known, therefore no confidence in assessing the plan at this stage.</p> <p>Para. 2.10 – states that the 25 year Environment Plan supports large scale woodland creation, yet this is not reflected in Section 9 of the Plan (relating to climate change and natural environment).</p> <p>Para. 2.21 – in relation to historic environment, should mention be made to local listed assets? No reference made to conservation areas.</p> <p>Where objectives in Table 5 (section 3) are highlighted as amber (1, 5, 6 and 7), cannot be assessed as green, should overall growth number not be viewed as working against the overall Government objective to be carbon neutral by 2050?</p> <p>Why is overall increase in the causes of climate, waste, air quality be amber and not red?</p> <p>The overall sustainability impact is not positive against the objectives for climate change, adapt climate, biodiversity, landscape, historic, waster, pollution and resources. This implies that the negative impacts of development would bring additional harm working against any climate change action plan.</p> <p>In relation to air quality, sites chosen for schools, sport, community provision should be subject of stringent air quality monitoring, taking account of future development. This would avoid a school such as Oakwood in Binfield being sited close to a known problem junction (A329).</p>
555 Warfield Parish Council	WAR3 Jealott's Hill: Note the low scores against SA4a and note para 3.157 of the Draft SA which identifies the site as the most significant landscape impact. Site requirements include the need to develop a comprehensive masterplan for the site; and to undertake and integrate an Environmental Impact Assessment. This supports WPC's view that the site should be removed from the plan and considered separately so that time is taken to gather the required evidence and develop a comprehensive plan.
555 Warfield Parish Council	<p>Table 8 of the SA (Sustainability Appraisal Results for Sites Proposed for Allocation) demonstrates the less than positive effects of WAR3 for allocation. 9 out of 13 of the influences shown demonstrate either negative or very negative effects against the SA objectives, the worse performance of all the potential sites listed. WAR3 scoring particularly badly for SA4a landscape, SA6b wastewater pollution, SA7 resource use (other) and SA18 land use.</p> <p>WPC would also question the evaluation that SA11 housing need is met. The proposals for 4000 homes in WAR3 are in excess of the requirements outlined in the local plan and as the reason the site is brought forward, we are told, is to develop the science park on the site. We therefore dispute that the site has a very positive effect on the SA objective.</p> <p>Table 9 shows the results with mitigation. We note that even after mitigation 6 of the 13 influences remain either negative or very negative.</p> <p>WPC also fails to understand how the proposals which include the science park only lead to a neutral impact, depending on implementation for objective SA9 economy and employment, particularly as the proposal is made on the basis of improving and developing new economic and employment facilities through the science park.</p> <p>WPC notes the comments in para 3.194 which says that “a further review is underway to determine if this is the 'best and most versatile' land and to assess the potential loss of this resource; this is included as a site requirement.” We would suggest that consideration is an important factor that needs to be assessed before the proposal moves forward.</p>
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
335 BBOWT	<p>The SA identifies key environmental issues in the Borough including:</p> <ul style="list-style-type: none"> <li>• Poor air quality</li> <li>• Fragmentation of wildlife habitats. A review of Green Infrastructure found that woodlands are generally well connected but grasslands and heathlands are more fragmented. Habitat creation through development should focus on maintaining woodland connectivity and enhancing ecological connectivity of grasslands and heathlands.</li> <li>• Concern about the impacts of development nature conservation areas with international designation, i.e. Thames Basin Heaths SPA and Windsor Great Park SAC.</li> </ul> <p>It is not clear why Table 6 Summary of the appraisal findings for strategic polices and special strategy shows that LP3 Provision of Housing and LP4 Sites allocated for residential / mixed use development as positive or neutral for biodiversity.</p> <p>In Table 7: Summary of the appraisal findings for Development Management policies, we disagree that SA3 Biodiversity is positive for LP49 Pollution and hazards due to our concerns about lighting set out in Section 9 above.</p>

422 Murphy	The SA demonstrates that WAR3 is the poorest for sustainability, even mitigated, of any site, with three 'xx' scores and 3 'x' scores, just one other site has two 'xx' scores; three have one 'xx'. Adverse impacts of WAR3 in terms of landscape, resource (farmland) use, poor access to services, travel and land use are all unchanged after mitigation: i.e. it is a poor choice of site and this cannot be mitigated. Its impacts over short to long term are negative for SA1 climate change ("isolated from settlements, routes to the site are physically restricted which may limit the potential to achieve sustainable transport improvements"), SA4a Landscape ("The most significant land impact as a result of the proposed site allocation"), SA7a Resources ("a 242 ha site largely in agricultural use"), and SA17 travel choice ("Transport is a key issue ... isolated from other settlements, especially Bracknell Town Centre and other larger centres beyond the Borough boundary. Routes to the site are physically restricted which may limit the potential to achieve sustainable transport improvements"). Overall, allocation of this site will impede meeting SA objectives and policy related to addressing climate change. <i>[Also summarised under LP7]</i>
922 R Wallen, 848 C Wallen	Proposal at Jealott's Hill scores badly even after mitigation, against: SA4a – Landscape (for two of the four parcels) – see para 3.157 "The most significant landscape impact as a result of the proposed site allocations is that at WAR3, Jealott's Hill" and "The site contributes to all five purpose of the Green Belt, the most significant contribution being 'assist in safeguarding the countryside from encroachment" SA7a – Resource use (other) SA18 – Land Use
866 C Wallen	3.121 pg 76 <i>"In line with the site selection process identified in Figure 2 above and following on from the publication of the SHELAA and Site Selection Methodology, an evidence base was developed to inform the site selection process. Site specific evidence was commissioned on sites outside of the Green Belt (and for site WAR3 in the Green Belt) to ensure that the comparative assessment of sites was based on the same evidence. It would not have been cost-effective or pragmatic to commission evidence for all Green Belt sites, given the policy protection afforded to the Green Belt."</i>  This implies that that the Council has not assessed WAR3 on the same basis as other Green Belt sites which is not acceptable.  Tables 8 and 9 (pages 78-81) WAR3 scores worse than any other site in Tables 8 and 9, even after allowing for mitigation. It particularly scores badly against SA4a (see also 3.157): "3.157 The most significant landscape impact as a result of the proposed site allocations is that at WAR3, Jealott's Hill."  3.177 (pg 97) What is going to happen to the Waste Water Site within WAR3 and what is its current purpose?  SA7a (pg 101) All studies (must be independent) should be concluded (water, minerals, agricultural land, waste water) before the Council can consider releasing this land from the Green Belt.  Its likely that it is Grade 3 agricultural. Agricultural land in UK is under continual pressure from housing. Should be by trying to protect and better utilize agricultural land.  3.204 There is sufficient space within the existing designated employment area of Syngenta to expand the facilities without having to release Green Belt land for 4,000 houses.  SA10 (pg 103) 3.206 - statement is incorrect. The requirement is for 3 primary and one secondary school.  SA17 (pg 105) 3.218 Study must be concluded before any decision is made. The SRN is key and requires improvement intra-borough  SA18 (pg 106) Figures 3, 4 and 5 For the sake of an open comparison and given the weight being given to WAR3 in this SA, comparative tables including the WAR3 site should be provided (enclosed).
<b>DEVELOPERS / PROMOTERS OF SITES</b>	

694 Syngenta	<p><b>Comments relating to the unmitigated and mitigated scores for each SA objective:</b></p> <p><b>SA2 Climate Adaptation</b>  There is potential for significant benefits in addressing climate change issues and how development response to climate adaptation. Development will meet needs well beyond plan period in highly sustainable way, reducing impact of (necessary) development. Positive effect in reducing greenhouse gas emissions, encourage more sustainable lifestyle, reduce private car use, walking and cycling.</p> <p>Sustainable development with employment, facilities and services within walking/cycling of housing and enhance public transport to Bracknell and Maidenhead. Internalisation of journeys. More sustainable than current employment at Jealott's Hill. Sustainable construction methods and materials at scale would have a potentially significant positive effect on limiting energy usage. At scale, low carbon and renewable energy technologies can be deployed.</p> <p><b>SA3 Biodiversity</b>  Proposals would have significant benefits with mitigation. Current valuable ecological habitat along tree belts/boundaries throughout the site, the predominant agricultural land offer far more limited ecological value. Significant SANG would offer biodiversity enhancements through creation of new semi-natural habitats. Therefore, higher positive scoring would be justified (e.g. positive or very positive).</p> <p>As a general point, the SA results tables would benefit from greater clarity e.g. Table 8 on page 80, provides SA scores for allocations (including WAR3) in the absence of mitigation, yet, Objective 3 (biodiversity) is scored as 'Imp' (i.e. the score depends on implementation) for the majority of allocations, including WAR3. However, Table 9 which follows it, provides the SA scores for allocations once mitigation has been taken into consideration, but still puts the WAR3 score as "Imp". Table 8 of the SA should, in terms of biodiversity, consider the likely unavoidable biodiversity impacts from each allocated site (e.g. such as the loss of habitat), and Table 9 should then have contemplated the prospects for mitigation and enhancement being feasible. In the case of Jealott's Hill, as an example, the Council's Biodiversity Study (February 2018 report), rates almost the whole of Jealott's Hill as having a 'low' level of ecological constraint. The SA scoring needs to take full account of such findings, including the significant potential for ecological enhancement generated as a result of the proposals at Jealott's Hill.</p> <p><b>SA4a Landscape</b>  Whilst the SA has concluded that parts of the site were well enclosed by topography and woodland, thereby reducing visual sensitivity, it concludes that there are other elements with intervisibility. It is considered that through an appropriate landscape design strategy, existing woodland / hedgerows which provide current screening could be significantly enhanced throughout the development in order to limit wider views of built development over time. This is supported by Landscape Appraisal technical work that we have submitted. Accordingly, the mitigated score against this objective should negative at worst, and we would suggest "Imp" would be more appropriate as it very much depends on the quality of landscape feature implementation.</p> <p><b>SA4b Historic</b>  We broadly agree with the narrative concerning heritage assets, however, it is considered that the scoring could be justifiably improved. The indicative masterplan produced demonstrates that consideration has been made to the location of relevant built heritage assets through the inclusion of appropriate buffers and mitigation of any key views through landscaping. Further, the proposals seek to minimise the loss of hedgerows, whilst seeking enhancement wherever possible. The impact on heritage objectives would therefore depend very much on the eventual masterplan that is implemented and any mitigation included; the scoring against this objective therefore should be "Imp", in that performance depends on the implementation.</p> <p><b>SA6a (air, soil, noise)/SA6b (wastewater) Pollution</b>  We have no comments on the SA scoring against SA6a. The SA scores SA6b as very negative without mitigation on the basis that the SA states wastewater treatment works infrastructure and / or treatment upgrades will be required, but as "Imp" with mitigation; We have no particular comments on this score other than to state that the upgrades, as required, would be delivered. The ability for the proposals to deliver upgrades as required is a benefit of the critical mass provided to support infrastructure improvements.</p> <p><b>SA7a Resource (other) and SA7b (water)</b>  The SA provides a very negative score against objective SA7a with or without mitigation. We do not consider this to be a correct scoring. This objective considers the impact on minerals and agricultural land as a resource. Firstly, an assessment of the minerals resource, which is predominantly limited to a northern area of the site, reveals that the mineral at the site (mixed unit comprising sands, gravels and fines) do not constitute a high quality resource and that the data obtained suggests that the mineral resources may be economically unviable owing to the limited resource available and potentially high processing / sorting costs associated with its development. Secondly, an agricultural land quality assessment has revealed that the land is classified as Subgrade 3b, i.e. of moderate quality. Therefore, the proposals would not result in the loss of the best and most versatile agricultural land. It is considered that the score against SA7a should be improved to "Imp" or "0". We have no comments to make with regard to the SA score for SA7b (water) which it scores as "positive". Page 32 of Appendix 4 confirms that there is:  "Surface water flood risk present, with three flow routes forming across the site during flood events and areas of ponding. On a large site such as this, there is potential to take a sequential approach to avoid these areas and implement an exemplar scheme to deliver multiple benefits including water quality, biodiversity, amenity, green infrastructure and reduced flow off-site."</p> <p><b>SA9 (economy) and SA11 (housing)</b>  We have no comments to make on the scoring against these objectives given the extremely significant economic benefits that would be provided by the allocation of the site for the proposed new Science and Innovation Park and sustainable new community based on Garden Village principles. Significant benefits would be experienced by Syngenta, the region and the UK which would have the capability to maintain and grow its influence in global agri-tech R&amp;D. In terms of housing, there would be significant benefits in enhanced certainty for housing needs delivery through the Plan period and beyond, including the significantly beneficial quantum (1,200 units) of affordable housing. This is important given the 1,545 people on the Council's housing waiting list at June 2019.</p> <p>Page 28 underscores the importance of scientific and technical activity to the local economy: <i>"Bracknell Forest has particularly high percentages of firms in the two largest sized-firm bands relative to both England and the South East. This can make the area more vulnerable to individual establishments leaving. Professional, scientific and technical activities are another important sector for Bracknell, and these have very high employment relative to other Berkshire Unitary authorities."</i></p> <p><b>SA12 Health</b></p>
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We have no substantive comments to make on the SA scoring for objective SA12, which “positive” score reflects the clear health benefits offered by the proposals in terms of encouraging walking/cycling to employment, facilities and services (including health care facilities), encourages a healthy outdoors lifestyle with a significant 46ha SANG / country park surrounding the development, significant other open green spaces LEAP, NEAP and LAP areas, community gardens and allotments, and would provide health facilities within sustainable convenient walking/cycling reach of residents, thereby encouraging use. Further, increased internalisation of vehicle trips through a genuinely sustainable new community would help mitigate greenhouse gas emissions caused by vehicle usage and thereby help combat the negative effects of air pollution on human health.

#### **SA15 Community**

We have no substantive comments to make on the SA scoring for objective SA15 for the with mitigation scenario, which it scores as both “positive” and “negative”. However, we would draw attention to the significant opportunity to create a well-integrated community with facilities and services within reach of all, the creation of high-quality open spaces and community facilities to foster interaction across all sects of society. A well-designed masterplan provides the opportunity to reduce poverty and significantly reduce social exclusion. Further significant benefit to the community would be available through the significant delivery of 1,200 affordable dwellings, particularly helping young people take the first step on the housing ladder and thereby increasing their potential retention in the area. The ability for young professionals to be retained and attracted to the new sustainable settlement would significantly benefit Syngenta, those other businesses which would be attracted to the new Science and Innovation Park, and notably a healthy and balanced community.

#### **SA16 Services**

We consider that the score for the scenario of the proposed development with mitigation should be more positive. A key component of the proposals is the enhancement of services and facilities. At present, the 850 employees at Syngenta’s Jealott’s Hill facility, plus local residents, do not have access to local facilities (retail, leisure and community); however, it is a key aspect of the proposed new Science and Innovation Park and sustainable new community to support the delivery of a significant amount of new services to the benefit of the existing population and those who would be new to the area. A new local centre would provide for daily and weekly shopping needs, enabled through a sufficient critical mass of residential to support it, whilst there would also be substantial new leisure, community and education facilities (three primary schools and a secondary school). Enhanced public transport and cycling routes would also help residents and employees viably access the greater range of services available in Bracknell Town Centre, such as the Lexicon, and those at Maidenhead. In light of the above, the with mitigation scenario should be scored as “positive” at worst, and potentially “very positive” given the level of change proposed in terms of access to services. This would be supported through high quality broadband.

#### **SA17 Travel**

It is recognised that public transport, highways and other infrastructure across the site and wider surrounding area would need to be upgraded. Such improvements, whilst primarily designed to mitigate any additional traffic flows arising from the development, would have wider benefits. It is considered however, that the potential significant improvements to public transport, notably the increased frequency of the no.53 public bus service, would create significant transport benefits which need to be recognised by the SA.

At present, public transport is not a viable option for the 850 employees at Jealott’s Hill, and as such there is complete dependence on the private vehicle. Public transport enhancements, as identified, would provide a viable alternative to the private car for employees working in Bracknell and Maidenhead, whilst the new sustainable community would provide significant affordable housing which could be taken up by employees. Employees would, with housing available adjacent to the new Science and Innovation Park, provide an attractive option to significantly reduce commuting time and cost whilst providing a healthier more sustainable option.

Section 2.16 highlights changes to the baseline since the scoping report was published in 2015. It notes that whilst road traffic has grown slightly, peak flows have reduced, whilst rail passenger numbers have increased by 25% in the past 9 years, and pedestrian and cyclist numbers have increased by over 25% since 2001. These trends in increased usage of sustainable modes, and reduction in peak flows could have a significant impact on modelling outcomes for the year 2036; this impact would be positive in that it could support the use of lower vehicle trip rates to represent the development, but could also point to a requirement for a greater provision of public transport services.

The Sustainable Appraisal objective 17 seeks to improve travel choice and accessibility, reduce the need for travel by car and shorten the length and duration of journeys. The proposals put forward support this objective through improved bus connections, pedestrian and cyclist links, and improved junctions to reduce congestion and shorten journey times.

Section 3.218 further emphasises that transport is a key issue for the proposed allocation at WAR3, the site encompassing the Land at Jealott’s Hill. This is further reiterated on page 112. Again, the proposals put forward are considered to address the issues highlighted by the council regarding transport to and from the site.

In light of the above, it is considered that the SA would justify a “positive” score against this objective for the mitigated scenario (including enhancements and work based / personal travel plans for employees and residents).

#### **SA18 Land Use**

We have no substantive comments to make on the SA score against this objective as the land is designated as Green Belt. However, it is relevant to state that there are very significant exceptional circumstances that fully justify the release of Green Belt land in this location as set out elsewhere in our representations.

#### **SA Scoring Review Summary**

The SA also provides a further breakdown in the assessment between four parcels of the development area, labelling them a, b, c and d. Syngenta wish to highlight two areas where the SA would require further consideration.

The first is the scoring of the four parcels in relation the objective SA4a Landscape, which states that parcels c and d, those to the east of the overall development site area, would score lower than parcels a and b in terms of landscape sensitivity. Landscape Appraisal evidence provided will demonstrate that the with mitigation scenario should benefit from more positive scoring. Accordingly, a revised SA should reflect such further consideration.

Secondly, the scoring rightly places “very positive” effects against SA9 (economy and employment) for parcel WAR3b which would include the new Science and Innovation Park. It is correct that this parcel would deliver very significant economic benefits. However, Syngenta would consider that parcels WAR3a, c and d are not devoid of economic / employment benefits and such should be recognised in the SA scoring. Whilst the other parcels will not house the Science and Innovation Park, they will include significant housing which would deliver significant employment and economic benefits through the construction period well beyond the Plan period. Further, those other parcels would also include some facilities which would also deliver employment benefits, such as the proposed third primary school within parcel WAR3c as shown on the indicative masterplan. Parcels WAR3a, c and d should have a “positive” score to reflect such benefits, rather than the current “Neutral” score.

694 Syngenta	<p><b>General comments on the Sustainability Appraisal report</b></p> <p>Paragraph 3.194: states that it is indicated that the site accommodates grade 3 agricultural land. We can confirm, as evidenced through technical work, that the land within the site has been found to be sub-grade 3b, and would therefore not represent the 'best and most versatile' agricultural land.</p> <p>Paragraph 3.196 and comments regarding minerals, a report has been prepared and provided to the Council which demonstrates the mineral resource, to the north of the site (sands, gravels and fines) would not constitute a high quality resource, and data indicates this may be economically unviable owing to the limited resource available and the potentially high processing / sorting costs associated with its development.</p> <p>Paragraph 3.206 recognises that WAR3 would include a requirement for new primary school facilities, however, given the scale of the development, and as included within the proposals presented, allowance within the indicative masterplan has been made for a new secondary school which would be a significant benefit.</p> <p>Paragraph 3.207 refers to the housing provision that would come forward through the delivery of the allocation of WAR3, however, it should also recognise the significant affordable housing provision which would bring significant benefits to Syngenta, the other businesses that would occupy the Science and Innovation Park, and the Bracknell community which would have access to substantial new affordable housing.</p> <p>Paragraph 3.147 to 3.154 (SA3 biodiversity) misses the opportunity to recognise the significant benefits on biodiversity brought by the proposals. This would include not only a biodiversity net gain in the form of significant new habitat created within the new 46ha SANG and other green infrastructure across the site. A strategic SANG of this scale would help go far beyond just mitigating the recreational pressure from future residents on the Thames Basin Heaths SPA to the south of the Borough and at such scale can help reduce habitat fragmentation. The strategic scale of the SANG would also help improve the baseline impact on the SPA by being of a scale sufficient to draw residents from the northern Bracknell area away from the sensitive SPA and to the new SANG proposed at Jealott's Hill (which could be even larger through connections with the Frost Folly SANG area to the south of the site).</p> <p>Paragraph 3.210: It is welcomed that the SA recognises the significant benefit that would arise through the increased public access to the Green Belt through open space and footpath provision at WAR3, however, Syngenta would suggest the latter part of the paragraph is not wholly accurate in stating a "neutral" effect on the SA12 Health objective; presently there is very limited access for the 850 employees at Jealott's Hill (plus local residents), whereas the SANG, other green space types and leisure facilities would provide a significant health benefit that currently doesn't exist. This must be a positive rather than neutral benefit.</p> <p>Table 12, objective SA11 (housing) states that 1,200 dwellings would be delivered within the Plan period. We consider this figure to be higher, with a potential 1,800 dwellings delivered by 2036, including significant affordable housing. Within the same table, the contribution of WAR3, with 1,200 affordable dwellings proposed, would make a significant contribution against objective SA13, which thus far, appears not to have been fully recognised within the SA.</p>
653 Thakeham	<p>BIN8 shown on draft policies map under LP18 and LP35 as a strategic gap. But strategic gaps have not been considered in conjunction with neighbouring authority, and how designation may affect sites along boundary. In interests of soundness, BFC is advised to clearly identify in the latest version of SA which sites straddle boundary so issues of a strategic nature are accommodated in a flexible manner. Council should be proactive in discussing sustainable sites such as White Cottage, Forest Road, Binfield [N.B. Site is located in Wokingham BC] with neighbouring authorities.</p>

565 Turley on behalf of Berkeley Strategic Land Ltd

**General**

The SA has not assessed the alternative spatial strategy options against the SA criteria – only provided a commentary. Don't consider this approach to be sound. Local Plan in its current form cannot progress as it has not considered sufficient reasonable alternatives through the SA process.

**Policy LP3**

The alternative options do not consider allocating additional land above the LHN. Needs to be considered as a reasonable alternative. Flaw in the legal tests in this regard.

**Beaufort Park (BRA4)**

Previous versions of the Draft Local Plan considered BRA4 alongside neighbouring site BRA3. BRA3 is now an omission site. Comments regarding BRA4 and its assessment in the SA and Housing Background Paper as follows:

- Climate adaption (SA2): does not have a positive score so questions why being progressed.
- Biodiversity (SA3): does not take into account potential impact on protected species. Council's Phase 1 Habitat Surveys (2017) included breeding site of the woodlark. Should be scored XX as will result in negative impact on biodiversity of more than local importance. Northern part of the site has both medium to high ecological value (part of the site being considered for designation as a Local Wildlife Site) and higher landscape sensitivity. Significant woodland cover would be lost. Considered to have a severe negative (XX) score.
- Landscape (SA4a): severe negative impact. Landscape sensitivity is high and habitats to the north having high sensitivity to potential development.
- Pollution (SA6): potential for noise pollution from neighbouring A road and residential amenity with odour from nearby Wastewater Treatment Works.
- SA6a and SA6b: needs to be updated to take account of oil pipeline.

Considers SA should be revised to reflect the comments above.

**Jeallott's Hill (WAR3)**

- Climate adaption (SA2): unmodelled potential sources of fluvial flooding which may increase flood risk at the site and surrounding area. Even with mitigation score should be negative.
- Landscape (SA4a): site in Green Belt and makes contribution to the 5 purposes. Of high landscape sensitivity and visually prominent from surrounding countryside and parts of Bracknell. Urbanising effect in rural setting. SA score is correct.
- Historic (SA4b): should be scored severely negatively with respect to protecting and enhancing heritage assets even with mitigation due to harm to heritage assets, their potential loss and merging of historic settlements.
- Community (SA15), Services (SA16) and Travel (SA17): isolated and connections by foot/cycle to town centre are undesirable and would require significant off-site improvements. Little evidence whether facilities provided as part of the development will come forward during the plan period. Should score severely negative, even with mitigation.

Considers SA should be revised to reflect the comments above.

**Land at Parkview Farm (BRA1)**

The site does not perform materially different to other proposed allocation such as Beaufort Park and Jeallott's Hill therefore question why not been included as a proposed allocation. An assessment of the site against the SA objectives using the same methodology has been undertaken as follows:

- Climate Adaption (SA2): good accesses to services which will minimise greenhouse gases. The sustainable Transport Strategy (report attached) identifies highway improvements, bus loop to enhance bus services, opportunities to improve pedestrian and cycle connectivity. Provision of site facilities will reduce travel demand. Site scores well in Council's Transport Accessibility Assessment (2017). No transport related grounds why site is not suitable therefore should have a neutral effect.
- Biodiversity (SA3): the Landscape and Ecological Vision (report attached) demonstrates how biodiversity gain of 11% can be achieved. Site mainly habitats of low ecological value. Opportunity to protect and enhance biodiversity. Consider has limited negative impacts on biodiversity connectivity and a positive effect.
- Landscape (A4a): Landscape and Visual Appraisal (report attached) which confirms site not visible from surrounding area. No overriding landscape or visual constraints that prevent development. Acknowledges key sensitivity relates to retention of strategic gap between Bracknell and Wokingham and setting of Easthampsted Park. Can be addressed through location of development and planting. Site has a medium landscape sensitivity and as the development would include mitigation should be single rather than double negative.
- Historic Environment (SA4b): the Built Heritage Assessment (report attached) concludes that development will not affect setting of identified heritage assets (Old Oak Farm, The Clockhouse and Old Oak Court (all Grade II), Locks House (Grade II\*), Locks Barn, the barn at Sutton Court Farm and stables at Sutton Court Farm (all Grade II)). Easthampsted Park has limited views from site and only northern area of site contributes to setting. Therefore, there are no heritage constraints that haven't been accounted for in the design. Should be considered to have neutral effect.
- Economy and Employment (SA9): development of the site will create jobs and economic growth therefore will have a positive impact and score should be amended.
- Community (SA15): development likely to deliver sufficient community facilities and it close to many existing therefore should be amended from neutral to positive.
- Services (SA16): regard to the site BRA4 (Beaufort Park) note a single positive scoring in the SA. However, the land at Parkview Farm's overall score rating is a positive and negative. Considers that these comparative ratings appear to be misplaced, as BRA4 is located further away from strategic employment locations, centres and health facilities than Parkview Farm. The SA rating should be increased to a single positive score.
- Travel (SA17): development of the site will dissipate traffic to strategic road network, provide opportunity for junction improvements, pedestrian and cycle access within the development and public transport to town centre. Therefore, will have positive effect on SA as will deliver a mix of facilities and will internalise trips to reduce demand.

Considers SA should be revised to reflect the comments above. The site is more sustainable than proposed allocations at Jeallott's Hill and Beaufort Park and is clear and reasonable alternative in accordance with the spatial strategy and should be allocated.

## A1 Summary of LP Evidence Base (Sequential Test and Exception Test)

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
949 Environment Agency	<p>This allocated site is partly located in Flood Zones 2 and 3. This site must pass the Sequential and Exception Tests to ensure that your Local Plan is deliverable and compliant with National Planning Policy Framework paragraphs 157-161.</p> <p>We have reviewed your draft Sequential Test and Exception Test (dated October 2019) which states that the site 'passes the sequential test... due to the fact that the identified development needs cannot be accommodated on sequentially preferable sites within the Draft BFLP'. Table 1b of your Sequential Test states that various sites have not been allocated in Flood Zone 1 as they are 'located within the Green Belt and 'exceptional circumstances' have not been evidenced'. In order for this decision to be justified, you should explain why the Green Belt outweighs flood risk in Bracknell Forest.</p> <p>As part of the site is within Flood Zone 3, the Exception Test would also need to be passed. Your Sequential Test document states that the 'indicative developable area' is entirely within Flood Zone 1, and we welcome this use of the sequential approach.</p> <p>As the site is mostly in Flood Zone 1, it may be possible to change the red line boundary to exclude areas at high risk of flooding.</p> <p><b>Without justification of why SAND9 has been put forward, you plan may be found to be unsound.</b></p> <p>[Comment duplicated under Sites allocated for development, SAND9]</p>
949 Environment Agency	<p>This allocated site is also partly located in Flood Zones 2 and 3. This site must pass Sequential and Exception Tests to ensure that your Local Plan is deliverable and compliant with National Planning Policy Framework paragraphs 157-161.</p> <p>This site is included in table 3a of your Sequential Test which contains 'sites in Flood Zone 3 (not immediately passed the sequential test), that are not proposed for allocation'. Therefore it appears there is no evidence that the site has passed the Sequential Test or the Exception Test. These must be passed for this site to be allocated.</p> <p>It is not clear if the land at Hayley Green site (CLU7), which has been allocated in the emerging Warfield Neighbourhood Plan for 235 homes, is to be included in the Local Plan figures. Please can this be clarified. We note that the site is included in the housing figures in LP4 of Part 1 of the Local Plan.</p> <p>If this site is to be included in the Local Plan housing figures, both the Sequential and Exception Tests should be passed and included in the evidence base.</p> <p><b>Without justification of why land at Hayley Green has been put forward, you plan may be found to be unsound.</b></p> <p>[Comment duplicated under Hayley Green Warfield NDP section]</p>
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	No Comments received
<b>DEVELOPERS / PROMOTERS OF SITES</b>	No Comments received
<b>PROMOTERS OF SITE</b>	No Comments received
<b>PROMOTERS OF OTHER SITES</b>	No Comments received

## A1 Summary of LP Evidence Base (SHELAA)

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY	No Comments received
RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS	No Comments received
DEVELOPERS / PROMOTERS OF SITES	No Comments received
PROMOTERS OF SITE	No Comments received
PROMOTERS OF OTHER SITES	No Comments received
565 Turley on behalf of Berkley Strategic Land Ltd	<p>The SHELAA identifies a number of constraints affecting the site (reference: BRA1) which can be addressed as follows</p> <ul style="list-style-type: none"> <li>• Located outside of a defined settlement <ul style="list-style-type: none"> <li>○ Not a constraint and should not preclude allocation. Bracknell is most sustainable settlement and site is to west of built up edge with good access to facilities and employment.</li> </ul> </li> <li>• Contains trees along boundaries and change in levels across site. <ul style="list-style-type: none"> <li>○ Landscape and planting strategy would minimise impact</li> </ul> </li> <li>• Contains agricultural land at grade 3, some of which may be 'the best and most versatile' (grade 3a). <ul style="list-style-type: none"> <li>○ Not an impediment to site suitability as Grade 3 land will have to be developed to meet housing needs</li> </ul> </li> <li>• Partly contains/adjacent to Local Wildlife Site, Ancient Woodland, and area of land liable to flooding. <ul style="list-style-type: none"> <li>○ Provides an opportunity to protect and enhance</li> </ul> </li> <li>• Setting of adjacent listed building (Easthampstead Park College). <ul style="list-style-type: none"> <li>○ Have commissioned an 'Addendum to Built Heritage Assessment' to examine relationship (report attached). Report has concluded that site makes a limited contribution to the setting of the house.</li> </ul> </li> <li>• Site is above an archaeological asset. <ul style="list-style-type: none"> <li>○ An Archaeological Desk Based Assessment (report attached) established that no protected assets recorded on site. Site has potential remains however post-depositional impacts are considered likely to have had a widespread negative impact and "are likely to be no more than local significance".</li> </ul> </li> <li>• Within Thames Basin Heaths SPA 400m - 5km buffer <ul style="list-style-type: none"> <li>○ Not an impediment as will include SANG.</li> </ul> </li> </ul> <p>Note the SHELAA finds the site potentially suitable. The SHELAA should be updated to reflect the above and supporting documents.</p>



## A2 Housing Trajectory

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
550 Warfield Parish Council	Accept that housing is needed at a national and local level, however cautious about housing demand/supply and need based on experience of Warfield SALP site.  Progress on some sites in the SALP suggest that either developers are sitting on land to maximise returns or demands placed by BFC on developers are challenging to meet. Timetables have slipped, and Suggest BFC be mindful that complex sites (and those in multiple ownership) take longer to bring forward.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
475 Warfield Environmental Group, 920 R Wallen, 859 C Wallen	The trajectory shows that expectations are not always being met in terms of delivery e.g. Policy SA9. Area 3 is of particular concern as no master plan has been agreed. Possible risk that Area 3 is not developed (thus leaving a shortfall of 421 homes). The Council needs to push for this area to be developed and thus protect other green field/Green Belt sites.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
690 Syngenta	Provide revised trajectory for Jealott's Hill proposal: Application submitted in 2021 Permission in 2022 Commencement in 2023 First completions 2024  Reference made to Bordon Hampshire
<b>PROMOTERS OF SITE</b>	
	No Comments received
<b>PROMOTERS OF OTHER SITES</b>	
565 Turley on behalf of Berkeley Strategic Land Ltd	Consider that the assumptions made about first completions and annual delivery rates are overly optimistic and are flawed as it does not factor in an appropriate allowance for the lead in times associated with the delivery of large scale strategic sites. Also concerned that the approach does not make an appropriate allowance for the delivery of infrastructure which may be required before the completion of dwellings. We reserve the opportunity to present more detailed evidence on supply and the housing trajectory as the Local Plan progresses and in light of new evidence being prepared and/or made available during the course of the Examination.
565 Turley on behalf of Berkeley Strategic Land Ltd	Notes that Bracknell Forest is required to have a 20% buffer due to the Housing Delivery Test results giving an annual requirement of 738 dwellings from 2019/20-2023/24. An analysis of the rolling 5 years periods from 2019/20 to 2024/25 is included and concludes that there is a gap in supply between the period 2021/22 to 2025/25 (2021/22 – 2025/26 = 4.90 years; 2022/2023 – 2026/27 = 4.83 years; and 2023/2024 – 2027/28 = 4.98 years).  Additional land should be sought to deliver within this period.  (Reference made to Parkview Farm Site, BRA1)

### A3 Borough and parish maps showing allocations

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY	
	No Comments received
RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS	
	No Comments received
DEVELOPERS / PROMOTERS OF SITES	
PROMOTERS OF SITE	
	No Comments received
PROMOTERS OF OTHER SITES	
901 Shanly	Should include sites allocated in the SALP

## A4 Site profiles for sites proposed for allocation

Where comments relate to the site profiles contained in Appendix 4 of the Draft Local Plan, these have been summarised against the relevant sites listed in Policy LP4 (section 6.2) of the Draft Local Plan, in order that comments relating to sites are covered in one location.

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY	
	No Comments received
RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS	
434 Murphy	Jealott's Hill: Overall, many requirements are unachievable and/or insufficiently specified. They do not protect from inappropriate development. Development guided by these requirements is unacceptable.
434 Murphy	Jealott's Hill requirements: Note 'consultation' is not included. This is a requirement at all stages for a garden community (MHCLG 2018 Garden Communities, para. 12). Absence here clearly shows LP 7 is not a garden community proposal or policy. Therefore inappropriate to use the 'garden' label anywhere in Plan.
434 Murphy	Jealott's Hill requirements bullet 4 (GB compensation): inappropriate to stipulate "a package of compensatory improvements" without first establishing whether it is possible and elaborating what it might comprise if it is. Rules out allocation.
434 Murphy	Jealott's Hill requirements bullet 5 (habitat regs): site not included in Habitats Regulations Assessment. Who would do this work, including in-combination assessment for development, including projected business growth, for this Plan period and the next? The wording refers largely to TBH SPA and SANG provisions; air quality and the Windsor Forest and Great Park SAC by allusion only.
434 Murphy	Jealott's Hill requirements bullets 7 and 8: disingenuous to include when evidence base in SA indicates "routes to the site are physically restricted which may limit the potential to achieve sustainable transport improvements". Rules out allocation.
434 Murphy	Jealott's Hill requirements bullet 12: 1) Replace 'protect and enhance' with 'deliver net gain in'. Starting points would be: (i) the biodiversity that should be present in clay farmland managed under environmental schemes, and (ii) whether biodiversity net gain is therefore achievable. Rules out allocation.
434 Murphy	Jealott's Hill requirements bullet 14: acknowledged that visual impact will be "reduced" only. Insufficient. Rules out allocation
434 Murphy	Jealott's Hill requirements bullet 15 and 16: note already an 8 km network of 10 established rural PRoW within the site. Should stipulate protecting rural nature of GI/PRoW (e.g. LP Part 2, para. 18.2.6). Not achievable. Rules out allocation.
434 Murphy	Jealott's Hill requirements bullet 18: Inadequate wording. Undeliverable requirement (SA cumulative impact for SA4a landscape impact). Rules out allocation.
434 Murphy	Jealott's Hill requirements bullet 22: unnecessary loss of high-quality farmland is not justified. Climate change and food security impact. Rules out allocation
434 Murphy	Jealott's Hill requirements bullet 23: the site should not be considered until Environmental Impact known. Rules out allocation.
336 BBWOT	All sites should refer to biodiversity net gain.
477 Warfield Environmental Group, 921 R Wallen	Jealott's Hill Requirements bullet 16: revise to "... Retention of important existing trees, <b>copses</b> and tree belts..."
477 Warfield Environmental Group, 921 R Wallen, 860 C Wallen	Jealott's Hill Requirements bullet 12: should refer to following as important for biodiversity - existing copses (eg Wellers Copse), Drown Boy Pond, mature 450 tree species rich orchard within the Community Landshare site
921 R Wallen, 860 C Wallen	Bullet 2 - The illustrative concept plan is incorrect. Copses are missing. Orchard area on Jealott's Hill Community Landshare site should be shown and protected.
DEVELOPERS / PROMOTERS OF SITES	
766 Wilson Development	Part 1: (BIN12) The last bullet under 'Requirements' should state " <u>where possible</u> " the site should improve the biodiversity value of the site and connectivity to the wider area, to provide flexibility in incorporating new vegetation.
PROMOTERS OF SITE	
976 Wellington College	Vision document demonstrates Wellington College will seek to retain all existing vegetation where possible: <i>"Retain hedgerows and trees on site <b>wherever possible</b> and improve the existing biodiversity connectivity through the site such as through the enhancement of the trees and hedgerows".</i>
976 Wellington College	Revised settlement boundary cuts across southern portion of site to maintain a gap between Crowthorne and the linear development, but considered BFC have minimal justification for this. If south of site developed sustainably, would help integrate future housing with surroundings. More appropriate places on site for open space to be located. Request draft revised settlement boundary amended to include the whole of Derby Field allocation to allow for appropriate and sustainable development.
PROMOTERS OF OTHER SITES	
	No Comments received

## A5 Defined 'Town Centre' maps

<b>NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT</b>	<b>SUMMARY OF MAIN ISSUES RAISED</b>
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
552 Warfield Parish Council	The proposed community hub at Priory Field should be included as a local centre with shops.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
	No Comments received
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
	No Comments received
<b>PROMOTERS OF SITE</b>	
	No Comments received
<b>PROMOTERS OF OTHER SITES</b>	
	No Comments received

## A6 Changes to designated Employment Areas

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY	
	No Comments received
RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS	
	No Comments received
DEVELOPERS / PROMOTERS OF SITES	
	No Comments received
PROMOTERS OF SITE	
	No Comments received
PROMOTERS OF OTHER SITES	
	No Comments received

## A7 Landscape Character Area

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY	
	No Comments received
RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS	
016 Brown	Pleased that Bog Lane is included within a landscape character area.
435 Murphy	Unclear why the clay farmland was divided into two or the reason for the location of the boundary, as the LUC study notes that changes in landscape are gradual (noting the Malt Hill boundary as an example of where change is not apparent on the ground). Has the division of Warfield parish led to less consideration of its landscape over the past 20 years, and has that contributed to looming overdevelopment in this parish? SA9, other allocations in Warfield north of Forest Road, and LP 7 urbanises the parish to the northern boundary with RBWM. Warfield would become an urban extrusion into the countryside and Green Belt, devoid of its current landscape character. Is this good planning?
864 C Wallen	4 - Strategic Gaps (pg 45) – if Jealotts Hill goes ahead there needs to be a Strategic Gap between JH and Warfield Street in order to safeguard against development at Moss End and Scotland's Farm.
DEVELOPERS / PROMOTERS OF SITES	
	No Comments received
PROMOTERS OF SITE	
	No Comments received
PROMOTERS OF OTHER SITES	
	No Comments received

## A8 Green Belt Villages

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY	
	No Comments received
RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS	
499 S Collings, 615 M Collings, 863 C Wallen	Why are no Green Belt villages identified in Warfield? Moss End?
DEVELOPERS / PROMOTERS OF SITES	
	No Comments received
PROMOTERS OF SITE	
	No Comments received
PROMOTERS OF OTHER SITES	
	No Comments received

## A9 Existing policies to be replaced by BFLP

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
352 Ministry of Defence	Support retention of SA10.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
	No Comments received
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
574 Woolf Bond Planning on behalf of Warfield Park Homes	<p>Object to the replacement of existing BFLP Policy EN11 (relating to Warfield Park Mobile Home Site) with Policies LP33 and LP35.</p> <p>An appropriately worded 'new' EN11 Policy in conjunction with the settlement designation would allow flexibility whilst still ensuring that any new development would still retain the special character of the Park.</p>



## A10 Glossary and Abbreviations

<b>NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT</b>	<b>SUMMARY OF MAIN ISSUES RAISED</b>
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
554 Warfield Parish Council	Garden village should be included in definition
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
Berkshire Gardens Trust	Welcome the description of 'Heritage Asset' in particular the reference to local assets as well as registered assets. However, under 'Historic Park and Garden' there is neither mention of the word 'Registered' as defined by Historic England nor any differentiation between Registered and non-designated areas. It is hoped that Bracknell Forest Council will commit to compiling a list of parks and gardens of local value, expanding on the work already done through the Character Areas and Landscape character areas studies to date. Willing to assist the Council in this work.
478, Warfield Environment Group, 500 S Collings, 617 M Collings, 922 R Wallen, 861 C Wallen	Add a definition of Green Belt Village/Settlement. Choose one or the other term to be consistent.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
	No Comments received
<b>PROMOTERS OF SITE</b>	
	No Comments received
<b>PROMOTERS OF OTHER SITES</b>	
	No Comments received

## PART 2 - Non-Strategic Development Management Policies

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
	LP21 – Protection of Housing Stock
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
524 Binfield Parish Council	Policy supported.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
	None received.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
	None received.

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
	<b>LP22 – Housing for older people and people with disabilities</b>
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
524 Binfield Parish Council	Housing stock for older people is often not in a good location, and is not accessible. Should be attractive and close to transport and community facilities. Adequate visitor parking must be provided.
557 Warfield Parish Council	Policy supported, although comment that siting of homes is important, with good access to healthcare and other facilities. Sufficient parking for staff and visitors required.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
410 Murphy	LP22 (Housing for older people) Para 10.2.5: Are categories C2 and C3 too restrictive? Would it be helpful to incorporate care industries categories (informally?), to monitor demand/provision?
867 C Wallen	Para 10.2.1.1 – need to explain what 'wider western housing market area' means.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
672 RPS on behalf of Bewley Homes	LP22 (Housing for the elderly and people with disabilities) PPG refers to need to consider whether specific allocations should be made for specialist older-persons housing - may be appropriate where there is an unmet need for this type of housing. Making firm allocations can provide both greater certainty for developers and encourage growth in suitable locations.  Unsound as does not allocate any sites for older persons' accommodation. Has failed to properly consider the implications of the updated PPG. As settlement boundaries are tightly drawn, very limited scope for delivery beyond brownfield opportunity sites.
507 Hawksbury Homes	As there are no site allocations for C2 within the plan, LP22 should be amended to read: "the proposed development would be located within a sustainable location, <b><i>in or near an existing settlement</i></b> , with access to essential every day services including transport, shops, community and healthcare facilities".
712 Gladman	With reference to the PPG, regards to policy seeking to introduce optional housing requirements, in particular that new homes will be required to be built to optional standard M4(2), insufficient information has been provided to justify this requirement. In particular, it is not clear how this proposed requirement relates to future needs within the area, whether the adaptability of existing housing has been considered, whether needs across different tenures has been taken into account, or whether consideration has been given to the impact that the requirement will have on the overall viability. Policy must be consistent with the PPG, e.g. that policy is modified to make it clear that the introduction of any optional M4(3) requirement for wheelchair accessible homes standards is not to be applied to market housing. The provision of specialist housing to meet the needs of older people is of increasing importance and the Council needs to ensure that this is reflected through a positive policy approach, based on a robust understanding of the scale of this element of need across the district. Specialist housing with care for older people is a type of housing that provides choice to adults with varying care needs and enables them to live as independently as possible in their own self-contained homes, where people are able to access high quality, flexible support and care services on site to suit their individual needs (including dementia care). This differs from traditional sheltered/retirement accommodation schemes.
501 Bracknell Land Limited and Tingdene Parks Limited	LP22 - Policy should include a provision that the requirements should be 'subject to viability considerations' in respect of accessible and adaptable dwellings, and wheelchair accessible dwellings. Pertinent given the policy includes a provision for 'any subsequent updates' to building regulations, which could mean the requirements are made more onerous in the future, which could significantly impact upon viability.  Not clear from the supporting evidence base published alongside the draft Local Plan consultation whether BFC has considered the full range of evidence required by the PPG to justify these requirements as part of draft Policy LP22. This requirement therefore currently appears unjustified based on the information available at this time. Suggested amendments to policy as follows:  <b><i>"On development of 20 or more dwellings, at least 5% of dwellings will be constructed in accordance with the requirements of Part M (3) Category 3 – Wheelchair user dwellings of the Buildings Regulations 2010 (Approved Document 'M' – Access to and use of Buildings – dwellings 2015) and any subsequent updates, unless it can be clearly demonstrated that this is unviable"</i></b> .
779 Boyer on behalf of W J Channing and Sons (Woking) Ltd Minstead Ltd and Markfield Ltd, xxxxx Bloor, 971 Jordan Construction, 983 Wellington College	Unclear from supporting evidence published alongside draft Local Plan, whether the full range of evidence required by PPG (Housing: optional technical standards) to justify requirements in LP22 (development of 20 or more dwellings). Currently appears unjustified.  Suggested amendment: <b><i>"On development of 20 or more dwellings, at least 5% of dwellings will be constructed in accordance with the requirements of Part M (3) Category 3 – Wheelchair user dwellings of the Buildings Regulations 2010 (Approved Document 'M' – Access to and use of Buildings – dwellings 2015) and any subsequent updates, unless it can be clearly demonstrated that this is unviable"</i></b> .
655 Spitfire Bespoke Homes Ltd	Onerous requirement. Policy should be amended to allow for viability considerations, as well as local need.  The PPG includes a separate section on 'Housing: optional technical standards' and states that (Paragraph: 007; Reference ID: 56-007-20150327): <b><i>"What evidence should local planning authorities use to demonstrate a need to set higher accessibility, adaptability and wheelchair housing standards? "Based on their housing needs assessment and other available datasets it will be for local planning authorities to set out how they intend to approach demonstrating the need for Requirement M4(2) (accessible and adaptable dwellings), and/or M4(3) (wheelchair user dwellings), of the Building Regulations. There is a wide range of published official statistics and factors which local planning authorities can consider and take into account, including:</i></b> <ul style="list-style-type: none"> <li><b><i>• the likely future need for housing for older and disabled people (including wheelchair user dwellings).</i></b></li> <li><b><i>• size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes).</i></b></li> <li><b><i>• the accessibility and adaptability of existing housing stock.</i></b></li> <li><b><i>• how needs vary across different housing tenures.</i></b></li> <li><b><i>• the overall impact on viability (...)"</i></b></li> </ul>

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
	<b>LP22 – Housing for older people and people with disabilities</b>
	Not clear from the supporting evidence base whether BFC has considered the full range of evidence required by the PPG to justify these requirements in Policy LP22. Requirement therefore appears unjustified based on the information. Should be amended to allow for viability considerations, as well as local need. Suggested revised wording is as follows: <i>“On development of 20 or more dwellings, at least 5% of dwellings will be constructed in accordance with the requirements of Part M (3) Category 3 – Wheelchair user dwellings of the Buildings Regulations 2010 (Approved Document ‘M’ – Access to and use of Buildings – dwellings 2015) and any subsequent updates, unless it can be clearly demonstrated that this is unviable”.</i>
Syngenta	Support the objectives of the Policy.  Note the requirement for 5% on sites of 20+. Whilst this may be effective on non-strategic sites, it is important to consider the need on strategic sites such as Jealott’s Hill.

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
	<b>LP23 Housing Mix</b>
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
524 Binfield Parish Council	Mix should be considered in line with what community facilities are needed to create a balanced community.
557 Warfield Parish Council	Policy supported.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
867 C Wallen	Para 10.3.5 - planning restrictions should be put in place to discourage the conversion of bungalows into two storey dwellings as this decreases the bungalow stock.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
723 Escrillion	Physical factors under criterion 2 (iii) should be applicable to all proposal types in determining a variation from the Housing Mix (Table 1) – not just conversions.
753 S2 Bracknell Ltd	Support the provision of a proportion of family sized housing, but object to current wording due to lack of flexibility in relation to the recommended housing mix in Table 1.  Suggested amendments as follows:  "1. Proposals will be supported which include a mix of housing to meet existing and future housing needs as set out in the most up to date evidence. i. All residential developments, including conversions of more than 10 dwellings (gross) will be <u>encouraged</u> expected to provide a mix of dwellings and tenures. <del>reflecting the requirements of Table 1 'Housing Mix' in the supporting text to this Policy or any more recent evidence published by the Council.</del> ii. Developments of fewer than 10 units will be encouraged to provide a mix of unit sizes. 2. In determining <u>unit mix</u> <del>any variation from this policy</del> the Council will have regard to: i. the appropriate mix for the site's size; ii. the most up to date evidence on local housing needs; iii. for conversions, physical factors limiting a particular mix; iv. site specific viability; and, <u>v. tenure models that can operate differently from traditional housing models.</u> "
994 Gladman	It's essential that the housing mix remains flexible in order to ensure that site specific circumstances can be considered on a case-by-case basis (including in the consideration of issues such as site size, location, scale, local needs, local demand and viability).
763 Willson Development	Support and welcome the need to consider more recent evidence, plus an appropriate mix for a particular site, and having regard to viability.
779 Boyer on behalf of W J Channing and Sons (Woking) Ltd Minstead Ltd and Markfield Ltd, 972 Jordan Construction, 984 Wellington College, 654 Boyer on behalf of Nicholas King Homes	Consider that in addition to site's size, existing character of area is often a material consideration when determining housing mix, which may justify variation from mix set out in Table 1. Recommend adding this factor to bottom of list in LP23 for completeness.
632 Pegasus on behalf of Redrow Homes and Persimmon Homes Thames Valley	Concerned that the LPA is seeking to interfere with the market by attempting to prescribe the housing mix. Whilst affordable may be able to be provided in line with identified needs, the mix for private housing is demand related and should be left to the market to determine. Developers are best placed to respond to the fast changing market conditions, than Local Plan policies that can quickly become out of date.  There are factors which may justify a departure from the preferred mix: a. The nature of the development site b. The character of the area, c. The existing mix, and d. Turnover of properties at the local level.  These points are referred to in the SHMA (para 10.78) but have not been carried forward in the policy (noted that some points are referred to in the supporting text at para. 10.3.4)
Syngenta	Welcome recognitions within the policy for the need to consider more recent evidence, and that a 'rigid' application of housing mix may not be appropriate in all cases (as with Jealott's Hill).

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
	<b>LP24 – Gypsies, Travellers and Travelling Show People</b>
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
368 Wokingham Borough Council	Note that policy LP26 has been amended following comments about it not being positively worded.
459 Historic England	In criterion ii, the reference to heritage assets has been removed. This should be rewritten to include reference to heritage assets.
524 Binfield Parish Council	Policy supported.
957 Environment Agency	Sites for gypsies, travellers and travelling showpeople are identified as highly vulnerable development in accordance with table 2 of the flood zone and flood risk tables of the PPG. Therefore these sites should be located in Flood Zone 1. Where this is not possible they can be located in Flood Zone 2 if the Sequential and Exception Tests are passed, but not within Flood Zone 3.  We welcome paragraph 10.4.6 which states that the policy 'should be read in conjunction with Policy LP 17 Flood Risk' and 'new or extended traveller sites will not be supported in areas at high flood risk'. To strengthen this approach to ensure gypsies, travellers and travelling showpeople are not located in areas at high risk of flooding, we suggest that wording on flood risk should be included in policy LP24.  In addition, water quality should be highlighted as a key consideration to prevent pollution of aquifers or streams in line with paragraph 170 of the NPPF. Sites should be connected to foul sewers, or where this is not possible the waste should be disposed without impacting on water quality.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
867 C Wallen	Policy number missing.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
	None received.
NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
	<b>LP25 – Designated Employment Areas</b>
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
524 Binfield Parish Council	Policy supported.
557 Warfield Parish Council	Consider that Syngenta should be a designated employment area, on the basis of the importance of employment the site to the Borough.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
	None received.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
797 Savills on behalf of M&G Real Estate	Object to M&G's Homebase site being designated in the Western Employment Area. Existing and long-established (20 years) A1 use of the site does not contribute to policy objectives since not traditional BIDS. Site should be removed from designated employment area since Policy LP25 cannot apply to the site and it would act as a 'barrier to investment' at the Site and would not accord to flexibility promoted within NPPF para. 81. Reasons for requested deallocation: length of time since site was allocated in the development plan (since at least 1992) but not contributed to employment since construction in mid-1990s; site been in retail use for 20 years; site is not available for employment use and unlikely to ever be. Para 120 NPPF requires planning policies to reflect changes in demand for land; allocation of the site for uses that will not be delivered means plan will not be justified and therefore cannot be considered sound. Request removal of site would not damage wider integrity of wider employment area.
797 Savills on behalf of M&G Real Estate	Office buildings to the immediate west of the Homebase site that have been converted under Prior Approval are proposed for removal from defined employment area when on periphery. Same approach should be taken to M&G's Homebase site; it should be removed from designated employment area.

<b>NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT</b>	<b>SUMMARY OF MAIN ISSUES RAISED</b>
	<b>LP26 – Employment development outside designated Employment Areas</b>
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
524 Binfield Parish Council	Policy supported.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
	None received.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
997 Gladman	Support. Important that policy approach to enabling economic growth is positively framed in a manner that is flexible enough to accommodate needs not anticipated in the Plan and enable a rapid response to changes in economic circumstances.

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
	<b>LP27 – Smaller Businesses</b>
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
524 Binfield Parish Council	Policy supported.
557 Warfield Parish Council	Recognise the important role of smaller businesses to local and national economy. Smaller units should be protected from change of uses.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
	None received.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
793 S2 Bracknell Ltd	Outside of allocated employment areas, applications involving loss of floorspace should be determined in accordance with the NPPF and government objectives to boost housing.
	Suggested amendments as follows to Point 3, part ii:
	“the proposal is for an alternative use – the benefit of which clearly outweighs the loss (to be determined in accordance with the objectives of the NPPF); or”



<b>NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT</b>	<b>SUMMARY OF MAIN ISSUES RAISED</b>
	<b>LP28 – Development in Bracknell Town Centre</b>
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
321 Bracknell Town Council	Transport interchanges should be located so that they are effective hubs for public transport and sustainable modes.
524 Binfield Parish Council	No comments.
557 Warfield Parish Council	Policy supported.  Further development of the town centre needs to ensure the viability of commercial activity. Other supporting infrastructure such as lighting is required. Transport infrastructure, particularly public transport, pedestrian and cycle facilities are essential to delivery of development within the town centre.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
	None received.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
642 BRP	Consider there to be an urgent need to update the Retail Study as The Lexicon has now been trading successfully for a while. Also need to take account of the closure of Sainsbury's and the impact of the loss of a key town centre anchor which facilitates linked trips. Object to reduction in extent of PSA.

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
	LP29 – Development proposals in centres
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
524 Binfield Parish Council	No comments.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
	None received.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
643 BRP	Queries whether updated shopping frontages are to be defined. Due to the challenging retail market, there is a need for flexibility to re-let units for alternative non-Class A1 retail use. The overriding strategy should be to secure occupiers within the primary shopping area rather than have a restrictive policy which could extend the period over which floorspace remains vacant.

<b>NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT</b>	<b>SUMMARY OF MAIN ISSUES RAISED</b>
	<b>LP30 – edge of centre and out of centre development</b>
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
524 Binfield Parish Council	No comments.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
867 C Wallen	Para 11.6.6 is a contradictory paragraph. Says sufficient car parking should be provided but that it should not add to traffic generation. Any expansion of a facility or creation of a new one will encourage people from the local area to go there not always by means other than car. The Jealott's Hill proposal will lead to "traffic generation on the surrounding roads".
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
644 BRP	Welcomes a 'local' impact threshold of 1,000 sq. m but have concerns about policy wording, particularly reference to 'defined centres' given that the NPPF definition of a centre and radii, as set out in Annex 2 (Glossary), differs between retail, leisure and offices. Modify wording to make it clear that 'defined centre' for the purposes of Class A1 retail means the primary shopping area.
797 Savills on behalf of M&G Real Estate	No justification for the 1,000sqm threshold, which is 60% below national threshold (2,500sqm). Contrary to PPG (para. 015) which is clear on what the expectations are for setting a reduced threshold. Para. 89 implies impacts of developments below 2,500 sqm unlikely to lead to a significant impact. Consider BFC should determine applications on their own merits, including the application of national threshold of 2,500sqm (NPPF para. 86-90). Request removal of 1,000sqm impact threshold and use of default national threshold.

<b>NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT</b>	<b>SUMMARY OF MAIN ISSUES RAISED</b>
	<b>LP31 – protection of community facilities and services</b>
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
321 Bracknell Town Council	Community facilities important to residents and community cohesion. Development should require contributions to enhance them
353 Ministry of Defence	Still has concerns relating to application of this policy on MOD sites. Public use of MOD facilities is strictly controlled, and facilities on RMAS are based on requirements arising from National Defence needs. Therefore would be inappropriate to require MOD to meet various criteria of policy to demonstrate surplus to requirement. No definition of 'community facilities and services', so LP31 can be read to apply to RAS also. Would like to see the inclusion of additional wording within either the policy itself or supporting text which exempts MOD facilities and services from this policy.
524 Binfield Parish Council	Community infrastructure is vital to provide 'balanced communities' and must be considered for every development.
557 Warfield Parish Council	Loss of community facilities not supported. Policy supported.  Policy should ensure that existing parking provision is maintained.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
	None received.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
	None received.

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
	LP32 – Play open space and sports provision
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
524 Binfield Parish Council	Improvement of existing and additional provision is vital, and should not be compromised by development. Level of provision in northern parishes should be enhanced, parallel with level of development.
557 Warfield Parish Council	Policy supported.
	Requested BFC works with towns and parishes to ensure provision meets local needs.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
410 Murphy	Para12.2.15: Meaning of second part of sentence unclear; “acceptable standard” and ‘improving’ should not negatively impact rural attributes.
410 Murphy	Para 12.2.18: artificial light is not appropriate in rural areas and the Green Belt where Dark Skies should be norm, both as intrinsic to local character and in recognition of impact of light pollution on biodiversity.
410 Murphy	LP32 (Play, open space and sports provision) para 12.2.20: Agree to promote enjoyment of the countryside, which needs no elaborate provision.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
	None received.

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
	<b>LP33 – Protection of countryside</b>
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
353 Ministry of Defence	Would be useful if supporting text to Policy LP33 included a reference to Policy SA10 given that it falls within a different policy document. Policy LP33 and supporting paragraph 13.1.2 recognise that there may be a need to locate essential utility provision in the countryside. Given that this policy already recognises the need for other forms of nationally important development, it would be reasonable to also include a reference to development for National Defence purposes within this policy, in accordance with NPPF paragraph 95.
524 Binfield Parish Council	Policy supported. Strongly agree that countryside should be protected for its own sake.
557 Warfield Parish Council	Policy welcomed.
958 Environment Agency	LP33 Protection of countryside It is important that green and blue infrastructure in the countryside are also protected and enhanced. We suggest the following wording is added to point 3 of policy LP33:  <i>All development proposals will be expected to demonstrably protect and enhance the intrinsic character and beauty of the countryside as well as green and blue infrastructure.</i>  Paragraph 13.1.5 should also state that any change of use of existing buildings should be of an appropriate vulnerability in relation to flood risk, in accordance with the flood zone and flood risk tables of the Planning Practise Guidance (PPG).
672 RPS on behalf of Bewley Homes	Overly restrictive and inconsistent with the NPPF as it prevents growth above housing needs and prevents all development outside defined settlement boundary. Boundaries are not sound (reference to site SAND8) and policy not justified as it is not supported by evidence base (Landscape Character Assessment in relation to site SAND8).
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
410 Murphy	Point 2 "will be permitted" seems more certain than possibly intended, cf. text 13.1.2–13.1.4, where wording is more demanding, i.e. "must" be designed, "required", etc. Could clarify by switching LP 33 points 2 and 3?
410 Murphy	Para 13.1.7: Support first sentence.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
145 Leigh	Consider wording of policy to be unclear with ambiguous wording. Part 1 seeking consistency with national policy not considered to be a development management policy and therefore does not achieve anything (cites appeal decisions). Considers Part 2 to be a 'closed list' of types of development that would be permitted. Approach not considered appropriate, and states that Government and NPPF do not include closed lists for development that can occur in the countryside. Considered to be similar to Green Belt policy and no basis in national policy for such restrictions in the countryside. All development should be considered on the character and appearance of the countryside. Consider parts 1 and 2 should be deleted. Part 3 considered appropriate but repeats what is set out in LP35. In order for Local Plan to be concise, LP33 can be deleted.
672 Bewley	Applies a blanket approach to protection of the countryside, rather than distinguishing between areas with more or less environmental or amenity value, in accordance with landscape and visual evidence.  Paragraph 170 of the NPPF states that policies should contribute to and enhance the natural and local environment by, amongst other things, protecting and enhancing valued landscapes, commensurate with their statutory status or identified quality in the development plan. Paragraph 171 provides that plans should allocate land with the least environmental or amenity value. The Council has not had regard to these points.
507 Hawksbury Homes	As no sites are allocated for older persons accommodation (C2) and there is a significant need for it, suggest an additional bullet is added to Policy LP33, paragraph 2 as follows: <b>"vi. Older persons accommodation"</b> .
998 Gladman	(and LP 35 Landscape Character (outside of defined settlements) and separation of Settlements) – Policies are inconsistent with the NPPF, which indicates that the planning system should recognise the intrinsic character and beauty and character of the countryside and support thriving communities within it, rather than 'protect and enhance' it. As drafted it is too rigid, especially when considered alongside other proposed policies, e.g. LP2. Policies do not provide any flexibility in relation to otherwise sustainable housing proposals or provide any criteria to support economic development within areas that the plan defines as countryside, even though the NPPF expects plans to be flexible to adapt to rapid change. Flexibility should be provided in LP33 to support development in sustainable locations to meet housing need, including the needs of particular groups of people, e.g. affordable housing or serviced plots for custom/ self-build housing.
655 Spitfire Bespoke Homes Ltd	Draft Policy LP33 states that: <i>"1. Outside the defined settlement and the Green Belt, development proposals will be permitted where they are consistent with national planning policy. 2. In addition, the following types of development will be permitted. ....".</i> This list of developments permitted should be expanded to include "re-use of appropriate brownfield sites in sustainable locations".

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
	LP34 - Green Belt
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
524 Binfield Parish Council	Policy supported. Strongly support protection of the Green Belt.
557 Warfield Parish Council	Policy supported.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
909 R Wallen	Note that none of the hamlets of Warfield are specified as Green Belt villages in the 2016 Green Belt review. Why aren't Tickleback Row/Moss End judged to be Green Belt villages since Brockhill in Winkfield exhibits very similar characteristics.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
145 Leigh	Objection raised to part 3 of policy 'Green Belt village areas' and supporting paragraph 13.2.7 NPPF clear that land should either be in the Green Belt or out of it, quotes paragraph 140 of the NPPF. Considers Local Plan attempting to reintroduce policy approach that is inconsistent with national policy – would mean that remainder of Green Belt land within borough could not be considered against criterion e) of paragraph 145 which allows for limited infilling in villages, contrary to NPPF and case law. Provides: <i>Julian Wood v SSCLG and Gravesham Borough Council [2015] EWCA Civ 195</i> ). The judgement in <i>Braintree BC v SSCLG, Greyread Ltd &amp; Granville Developments Ltd [2017] EWHC 2743 (Admin); [2018] EWCA Civ 610</i> Considers LP34 should be modified to remove part 3 and Proposals Map altered accordingly.
145 Leigh	States that paragraph 13.2.4 has misunderstood NPPF with regards to not taking into account existing outbuildings. NPPF para 140(d) does not include a test in seeing if an outbuilding is somehow related or not to another. Any building can be replaced. NPPF does not state replacement of an outbuilding is inappropriate. Paragraph should be modified.
145 Leigh	States that paragraph 13.2.5 seeks to introduce a test relating to whether re-use of buildings in the Green Belt is acceptable in principle. Considered likely conversion works would require planning permission, so wording of paragraph 13.2.5 could be used to act as a trigger - if any element requires a planning application other than a simple change of use submission, the Council could refuse permission for that change of use. Paragraph should be modified.
145 Leigh	States in paragraph 13.2.10 reference to basements should be removed. Not considered to effect the openness or have any impact on the Green Belt, therefore not consistent with the objectives of Green Belt policy.

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
	<b>LP35 – Landscape Character</b>
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
459 Historic England	Support but like criterion ii to refer to the East Berkshire Historic Landscape Character Assessment.
524 Binfield Parish Council	Policy supported.
557 Warfield Parish Council	Policy supported.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
	None received.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
669 Lightwood Strategic	<p>Supporting text form LP18 &amp; LP35 should correlate so there is no doubt as to the purpose of as settlement gap.</p> <p>Supporting text to LP18 (paras. 9.50-9.54) landscape function, with further information set out in LP35.</p> <p>Given the supporting text to LP18 notes settlement gaps are a landscape function, object to the function of two concepts in the title of LP35.</p> <p>Although not that the two concepts are covered separately by points 1 and 2, suggest point 2 should have its own policy reference, i.e. development in settlement gaps.</p> <p>Suggest that the policy test in clause 2 is different to the supporting text of 13.1. Unhelpful to have two different concepts. Policy wording refers to the need to "development would not adversely affect the function of the land, and not unacceptably reduce physical and visual separation"</p> <p>Comments on para 13.1.1 – no need to refer to coalescence if the objective is the need to maintain a significant gap. Suggested text amendment to supporting text:</p> <p>"Development proposals in strategic gaps will be resisted if they lead to the coalescence of settlements or fail to maintain a significant gap between them"</p> <p>Suggest that clause 2 of LP35 is given its own policy reference, and be amended as follows:</p> <p>"2. Within defined separation of settlements (gaps), development will only be supported where it can be demonstrated that it would maintain a significant gap between not adversely affect the function of the land, significantly and not unacceptably reduce the physical and visual separation of settlements either within or adjoining the borough. The LPA will have regard to both physical and visual matters in determine the significance of the proposed effect on settlement identity."</p> <p>Undisputed that effect on landscape character will need to be assessed, but consider a conflict to relate character to separateness. The supporting text to LP18 deliberately keeps the two concepts separate, but 13.3.11 to LP35 does not.</p>
998 Gladman	Support proposals for development within settlement gaps where it can be demonstrated that it would not adversely affect the gap's function and not unacceptably reduce the physical and visual separation of settlements either within or adjoining the borough.
501 Bracknell Land Limited and Tingdene Parks Limited	LP35 - It is not clear what 'adversely affecting the function of the land' means, and what a decision maker should be considering when assessing a planning application within a defined separation of settlement. This should be deleted.
654 Boyer on behalf of Nicholas King Homes	Supportive of the flexibility in draft Policy LP35 that allows development to come forward if it can be demonstrated that development would not adversely affect the function of the land, and not unacceptably reduce the physical and visual separation of settlements either within or adjoining the borough. However do not consider policy should not be imposed in relation to this Land to Rear of 89 Lock's Ride, Ascot in the first place.



<b>NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT</b>	<b>SUMMARY OF MAIN ISSUES RAISED</b>
	<b>LP36 – Dwellings for rural workers</b>
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
524 Binfield Parish Council	Policy supported.
557 Warfield Parish Council	Policy supported.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
	None received.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
	None received.

<b>NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT</b>	<b>SUMMARY OF MAIN ISSUES RAISED</b>
	<b>LP37 – Occupancy conditions</b>
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
524 Binfield Parish Council	Policy supported.
557 Warfield Parish Council	Policy supported.
	Where a change of occupancy condition is requested, review of evidence should be rigorous.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
	None received.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
	None received.

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
	<b>LP38 – Equestrian uses</b>
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
524 Binfield Parish Council	Policy supported.
557 Warfield Parish Council	Policy supported.
	There is a need to recognise that the amount and speed of development in the north of the Borough has resulted in many established stables now finding a lack of opportunities to hack and exercise. No new facilities should be permitted in areas where increased vehicle, cycle and pedestrian activity make horse riding dangerous.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
	None received.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
145 Leigh	LP38 (Equestrian Uses): Policy is considered redundant – criteria are covered by other draft policies in the Plan (LP13, LP15, LP17, LP18, LP19, LP33, LP34, LP35, LP39, LP42, LP43, LP44, LP45, LP49 and LP51). Only matter in LP38 not covered elsewhere is reference to British Horse Society standards, but any equestrian user would already have regard to this non-planning guidance. Singles out one particular user for special treatment, with no justification as to why should be an additional policy. Policy should be deleted.

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
	<b>LP39 – Design</b>
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
459 Historic England	Welcome the policy, particularly iii and v. In the evidence section refer to the recently published National Design Guide, which also sets out the need to understand the site and its context (C1) and in particular, heritage, local history and culture (C2).
524 Binfield Parish Council	Policy supported, in particular retention of trees and hedgerows.  Planning conditions should include TPOs and make clear long term retention is the goal.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
410 Murphy	LP39 (Design): Good to see placemaking a 'must. e.g. expect that development of greenfield sites will recognise importance of points iii, iv, v, vii, viii, xi, and xii, & that new developments respect existing character, patterns of development and landscape and not impose inappropriate development that destroys amenity and setting of existing homes in the rural landscape. The policy applied positively could create integrated enlarged communities where existing 'Countryside' settlement and new development fit together.
410 Murphy	Point v: add biodiversity; terms 'value' 'important', 'quality' and 'where reasonable' are not defined, therefore open to dispute. Could they be clarified?
060 P Holland	Proper bin stores should be provided in new developments to ensure wheelie bins are not in the streetscene Roads need to be wider to stop churned up green areas and broken kerb stones. The roads need to accommodate all forms of public transport. No visitor parking is provided. The car will not disappear in near future so more park and ride schemes and public transport needs to increase. Street lighting is poor in some places, particularly garage areas create unsafe and non-secure environments
792 S2 Bracknell Ltd	Supports design standards, but consider there to be duplication of point 2 of the policy with LP19.  Suggested amendments as follows:  "Masterplans and Design Codes <del>will</del> <u>may</u> be required for larger, complex or more sensitive developments <u>submitted in outline format in order to</u> agree an overall vision and strategy for a development as a whole that demonstrates a comprehensive and inclusive approach to design. These documents will be <del>required to be agreed</del> <u>reviewed on a case-by-case basis</u> with the Council prior to the submission of any planning applications for the site."
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
723 Escrillion	Site-specific circumstances, feasibility and viability will need to be considered for each site with contributions only being sought if they meet all the relevant national tests as set out in paragraph 56 of the NPPF. This will ensure that development on sites, including development that has been strategically identified, is achievable and deliverable.
723 Escrillion	Site-specific circumstances, feasibility and viability will need to be considered for each site with contributions only being sought if they meet all the relevant national tests as set out in paragraph 56 of the NPPF. This will ensure that development on sites, including development that has been strategically identified, is achievable and deliverable.
763 Willson Development	Support.
982 Wellington College, 970 Jordan Construction	Final paragraph could be misread to imply that Neighbourhood Plans are a form of Supplementary Planning Document rather than part of Development Plan. Should be clarified.
654 Boyer on behalf of Nicholas King Homes	Policies LP19 and LP39 appear to duplicate wording. Not efficient to have repetitive policies. Both should be revised to avoid duplication.
Syngenta	Requirements for masterplan and design code need to be clarified Unclear why they are prerequisites for planning applications, applicants has a statutory right to submit an application.

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
	<b>LP40 – Tall Buildings</b>
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
320 Bracknell Town Council	Whilst it is accepted that tall buildings are appropriate in Bracknell town centre, care needs to be taken over the appearance and functionality of the buildings, and its impact on the quality of life of occupants and town centre users.
321 Bracknell Town Council	Agree tall buildings appropriate in Bracknell Town Centre, but consider that care needs to be taken over appearance and functionality of buildings for both occupants and town centre users. Provided copy of Bracknell Town Centre Policy HO6 'Safety in Design of Tall Buildings'
456 Historic England	Criteria iii) and v) of the policy is welcomed. However, reference should be made in the evidence section to the National Design Guide which sets out the need to understand context, heritage, local history and culture.
459 Historic England	Welcomes the alteration of criterion iii to include reference to the historic environment. However, we would recommend this is reworded as:  <i>"they will not detract from the significance of heritage assets or the appreciation of that significance, nor have a negative impact on the local environment, including the micro-climate and the general amenity of surrounding buildings and spaces;"</i>
524 Binfield Parish Council	Tall buildings must be confined to town centre locations or industrial areas.
548 Warfield Parish Council	WPC expect BFC to ensure that any tall building proposals take account of the findings of the Grenfell Inquiry.
557 Warfield Parish Council	Any proposals for tall buildings should take account of the findings of the Grenfell Inquiry.
894 Winkfield Parish Council	Welcome policy for sensitively designed tall buildings in Bracknell Town Centre but does not support tall buildings outside of town centre.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
	None received.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
632 Pegasus on behalf of Redrow Homes and Persimmon Homes Thames Valley	In relation to historic assets, which developers will certainly seek to avoid harm, this is inconsistent with the NPPF and the Planning (Listed Buildings and Conservation Areas) Act 1990. Neither of these impose a nil detriment requirement on development control decisions. Therefore the policy should be amended to better reflect national policy.  In relation to para 14.2.7 'high standards of sustainability' is imprecise in that it fails qualify what is meant by these terms, and what is expected in terms of submitting a planning application.  Also question why tall buildings will be treated differently from other buildings which it comes to sustainability (which is taken to mean construction specification).
752 Savills on behalf of Morgan Sindall Investments	Support is welcomed however concern over implication of definitions in supporting text as it is a low starting point for a tall building. Within the town centre a site could be surrounded by existing buildings of 5/6 storeys in height or more and be considered a tall building. Outside of the town centre a 3 storey building adjacent to a single storey building could be a tall building. Should be increased for example 10 storeys of commercial or 12 storeys (36 meters tall) of residential.
752 Savills on behalf of Morgan Sindall Investments	There a number of multi storey car parks in Bracknell Town Centre. Town Centre is ideal location to promote sustainable transport which would be encourages by limiting parking provision on site. Adaptive parking strategies should be adopted to ensure car parking capacity is utilised as efficiently as possible by mixture of existing and proposed town centre uses to reduce the need for additional parking provision like at Winchester House.
763 Willson Development	Support. Regards residential schemes, tall, high density schemes can help the Council meet its housing need.
791 S2 Bracknell Ltd	Strongly supports the policy, however considers wording is too prescriptive. Comments also made in relation to impact of parking standards creating a conflict with sustainable brownfield sites, and implications upon deliverability.  Suggested amendments as follows:  "The Council will support proposals for tall buildings where <u>they demonstrate suitable consideration of the following:</u> i. the location is sustainable and suitable for high intensity development; ii. they are located at a point of townscape or transport significance and have a height, scale and massing that is proportionate to the proposed location and size of site;...."

<b>NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT</b>	<b>SUMMARY OF MAIN ISSUES RAISED</b>
	<b>LP41 – Advertisements and shop fronts</b>
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
459 Historic England	Support criteria 1i and 2i.
524 Binfield Parish Council	Consider that local crime statistics should be taken into account to prevent unsightly and unnecessary security measures.
557 Warfield Parish Council	Policy supported.  However suggest para. 14.3.4 is amended to include provided of a reduction in illumination out of hours. This would result in a reduction of light pollution and save energy.  Businesses should have a turn off lights policy.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
	None received.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
	None received.

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
	<b>LP42 – protection and enhancement of the historic environment</b>
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
321 Bracknell Town Council	Supportive of non-strategic polices. Welcome inclusion of locally listed buildings in Policy LP42, and policies LP45, LP46 and LP47. Note they will need to be reviewed as rapid change occurs during plan period.
459 Historic England	Support section 15 as a positive and clear strategy for enhancing historic environment as required by NPPF
459 Historic England	Welcomes additional sentence to A 2 however to align with NPPF recommend wording: “ 3.i There will be a presumption against granting planning permission for development proposals which would cause harm to the significance of designated heritage assets. <i>Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.</i> ”  “3.ii: Where an application would affect the significance of a non-designated heritage asset, a balanced judgement will be made, having regard to the scale of the harm or loss and the significance of the heritage asset.”
459 Historic England	Covered partly by paragraph 15.1.8, we encourage an additional specific development management policy or policies setting out the requirements of development proposals and providing a clear indication of how a decision maker should react to a development proposal affecting a heritage asset or assets as required by paragraph 154 of the NPPF. <ul style="list-style-type: none"> <li>• This policy or policies should include criteria for assessing the potential impact of development proposals on the significance of all relevant designated heritage assets:</li> <li>• Listed buildings,</li> <li>• Scheduled monuments (and non-scheduled archaeological assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments),</li> <li>• Conservation areas,</li> <li>• Registered historic parks and gardens,</li> <li>• Locally important heritage assets.</li> </ul> <p>The policy or policies should identify those particular characteristics of each type of heritage asset that contribute to its significance and which therefore should be protected or enhanced through development proposals. (Further advice on considerations for heritage assets in development management policies is set out in an appendix to this letter and we would be pleased to assist the Council with the drafting of such a policy or policies).</p>
459 Historic England	Paragraph 15.1.9: alteration welcomed
459 Historic England	Paragraphs 15.1.10 and 15.1.11: pleased the Council has and maintains a Local List and support aims of the paras which provides certainty to owners and developers. policy could also make clear that the selection criteria could also be used, should the local authority, or a qualifying body producing a neighbourhood plan, choose to add further heritage assets to the list/their neighbourhood plan in the future. Has the council considered whether any of the assets listed on the local list should be registered as assets of community value? Has the council added those assets on the list to the HER?  The selection criteria for local lists are matters for the local planning authority and their communities to develop, and the defined criteria would appear to be a sound approach for the identification of buildings and structures to the local list. However, does the council envisage the addition of heritage assets other than buildings and structure to the list? For example, some asset types are not currently well-recorded. The Register of Parks and Gardens of Historic Interest in England, for example, is thought to represent only around two-thirds of sites potentially deserving inclusion. Historic England would therefore recommend the council considers adapting the criteria to account for other types of heritage assets that could be locally listed. Historic England has produced guidance on Local Heritage Listing: Historic England Advice Note 7, 2016. Civic Voice has also produce guidance on local lists, with a focus on community involvement.
459 Historic England	Paragraphs 15.1.12 and 15.1.13: welcomes the paras which satisfy para 185 of the NPPF. Currently 2 assets at risk (Historic Park and Garden of Newbold College and Broadmoor Hospital).
458 Historic England	Key evidence: suggest adding Historic England Heritage at Risk Register and the East Berkshire Historic Landscape Character Assessment.
459 Historic England	Consider that the words “positive”, “enhancing” and “deliver” in the requirements of the NPPF for local plans are significant, and we believe that the plan (and council) should be proactive in the conservation and enhancement of the historic environment. Therefore look to local plans to contain commitments to positive measures for the historic environment e.g. a programme of conservation area character appraisals and management plans; the use of Article 4 Directions where harm is being caused to the special interest, character and appearance of a conservation area by the exercise of permitted development rights; the preparation of a list of locally important buildings and features; and/or a survey of Grade II listed buildings to ascertain whether any are at risk of neglect, decay or other threats. Welcome the commitment to monitor, in relation to heritage at risk, the existing local list, and criteria for augmenting the list through the development management process. However, we also look for explicit commitments to update conservation area appraisals, consideration of the use of Article 4 Direction and working with the local community, in order to demonstrate a “positive strategy” for the conservation and enjoyment of, and a “clear strategy” for enhancing, the historic environment. If these have been considered, but are not considered appropriate at this time, the plan should state this.  Further advice on the use of Article 4 directions can be found in Historic England Advice Note 1: Conservation Area Designation, Appraisal and Management.
459 Historic England	We consider that there are a number of examples of a positive strategy for the conservation and enjoyment of, and a clear strategy for the enhancing, the historic environment in the Draft Plan that we have welcomed, but also a number of instances we have identified where those strategies could be reinforced, in particular as regards proactive measures that the Council will undertake or seek to undertake to conserve and enhance the historic environment of the Borough.  Overall, we do not consider that the Plan demonstrates an adequate positive strategy for the conservation and enjoyment of, or clear strategy for enhancing, the historic environment as required by the NPPF, and is therefore not sound in this respect.
524 Binfield Parish Council	Suggest removal of words “where possible” from A.1
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
	<b>LP42 – protection and enhancement of the historic environment</b>
569 Berkshire Gardens Trust	Welcome this policy and the supporting text. The 6 Registered Parks and Gardens are listed. We note that the plan rather relies on the identification of non-designated historic landscapes through the development process. However, in the absence of an independent list of assessed assets across the Borough, it is difficult for Development Management to identify whether a potential developer has properly recorded and assessed a local asset. We urge the Council to compile its own list of parks and gardens of local value and are happy to assist.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
145 Leigh	Parts 3 and 4 of the Policy contain an inappropriate test for works to a heritage asset and is not consistent with national policy. NPPF paragraphs 194 to 196 quoted. LP42 is not considered to contain provision for a balanced judgement to be made (determining the degree of harm and then weighing that against public benefits), i.e. In part 3i) it simply says there is a presumption against granting planning permission that causes harm, 3ii) non-designated heritage assets will be protected from harm, and part 4 proposals harming significance will not normally be permitted. Policy should be modified.
999 Gladman	Concern that the policy is inconsistent with the NPPF's nuanced approach that is required in considering proposals affecting heritage assets and any potential impacts.
501 Bracknell Land Limited and Tingdene Parks Limited	The requirement for all new residential development to be designed to achieve zero carbon is not practical and should be removed. There is no definition of what constitutes a 'zero carbon home', therefore the policy provides no assistance to developers as to what will or will not be acceptable. Furthermore, what actually makes a home zero carbon, includes issues of air tightness, space heating requirements, which are not planning matters. This is an issue better addressed through building regulations, not through planning, as was proposed back in 2016.
632 Pegasus on behalf of Redrow Homes and Persimmon Homes Thames Valley	Support the inclusion of policies which seek to protect and enhance the historic environment. However, the policy needs to include balancing the provisions in the NPPF (for example weighing the public balance against harm) on a case by case basis.  Policy includes the following, but is unclear what is meant, and additional working is therefore required:  "Proposals [sic] affective heritage assets will be determined in accordance with the NPPF."  With additional wording, if public benefits were to outweigh the harm, that proposals would accord rather than conflict with the policy.
763 Willson Development	'A. General': 1 <sup>st</sup> para, is not consistent with the NPPF, as it does not allow harm to a designated asset's significance with a schemes public benefit (NPPF paras 195-196). Similarly for non-designated assets (NPPF para 197) it does not allow a balanced judgement to be made between harm to the asset's significance and its level of significance. It also includes the setting of an asset to be considered as though considered as part of the asset, which is not the case. 2 <sup>nd</sup> sentence: 'affective' should read 'affecting'. Suggested rewording: "Development proposals affecting the significance of heritage assets will be considered in light of a desirability on the part of the Council to sustain and, where possible, enhance the significance of affected heritage assets. Development proposals affecting the significance of heritage assets will exhibit sympathetic design in terms of siting, mass, scale and materials." 4 <sup>th</sup> para: not consistent with the NPPF. Policy does not allow for the balancing of any harm to a designated asset's significance with a scheme's public benefits (NPPF paras 195-196). Consequently, there can be no presumption against granting planning permission for a development that causes any degree of harm to the historic environment. Suggested rewording: "The retention, repair and re-use of heritage assets will be encouraged. For development proposals which would cause harm to the significance of non-designated heritage assets, this harm will be weighed by the Council with the proposal's public benefits."
Syngenta	The second sentence under A should say 'affecting' instead of 'affective'.  In order to be consistent with national policy, addition text required: <b>"including weighing a development proposals' harm to designated assets' significance with that development's public benefits"</b>



<b>NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT</b>	<b>SUMMARY OF MAIN ISSUES RAISED</b>
	<b>Chapter 16 – general comments</b>
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
	None received.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
413 Murphy	Chapter 16 (Natural Environment) Could 'Dark skies' be addressed here? Impact now evidenced and significant given global and local biodiversity declines. e.g. for insect species, a single 'flash of light' in the darkness can disrupt circadian rhythms. Behaviour and thus survival of a wide spectrum of animal taxa is affected, and not only nocturnal species. There is also growing evidence that plant physiology is affected by artificial light.
413 Murphy	Chapter 16 (Natural Environment) para 16.1.2: Compliance with Habitats Regs seems split between two polices in the two LP Parts (LP 16, LP 44) for TBH SPA/SANG provision, while other European sites and impacts are mainly in LP 44 and seem subordinated. Would it be better to have it all brought together in a policy section for designated/European sites.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
	None received.

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
	<b>LP43 – Biodiversity</b>
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
524 Binfield Parish Council	Request the following amendments: <ul style="list-style-type: none"> <li>2. (i) replace "adequate" with "comprehensive"</li> <li>3 – the inclusion of a hierarchy could lead to developers simply paying compensation; hierarchy does not make it clear that compensation is a last resort and not a simpler route to planning approval.</li> </ul>
557 Warfield Parish Council	Policy supported.
959 Environment Agency	<p>LP43 Biodiversity</p> <ul style="list-style-type: none"> <li>In line with paragraph 174 of the NPPF, this policy should seek enhancements to biodiversity.</li> <li>In addition, it would be useful to include a reference to ecological buffer zones and culverts in policy LP43 as in policy LP15 Green Infrastructure. Suggest: <p><i>2. Relevant development proposals will be expected to:</i></p> <p><i>i. provide an adequate level of suitable ecological survey information and assessment to establish biodiversity net gains and the extent of any potential impact on wildlife corridors (including river corridors), ecological features such as ancient woodland, veteran trees, hedgerows, orchards, waterbodies, protected species, priority species or priority habitat that may be affected during and after development (16), protected species, priority species or priority habitat may be affected during and after development. This information shall be provided prior to the determination of an application;</i></p> <p><i>ii. Retain, protect, buffer and enhance ecological features and provide for the appropriate management of those features (including de-culverting rivers where possible);</i></p> <p><i>iii. Where possible, create new ecological features and design-in provisions for wildlife to maximise opportunities for biodiversity and enhance existing ecological features;</i></p> <p><i>iv. Avoid fragmentation of habitats and create coherent ecological networks through the urban and rural areas such as improvements to Biodiversity Opportunity areas and creating or maintaining a 10m ecological buffer zone between the top of the river bank and the development (20m wide undeveloped area in total).</i></p> </li> <li>To achieve enhancements of biodiversity within river corridors, the following guidance could be included as supporting text for policy LP43: <p><i>Opportunities for Natural Flood Management, creating wetland features and reconnecting rivers with their floodplains should be considered, where appropriate, to enhance biodiversity and help manage flood risk.</i></p> </li> </ul>
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
413 Murphy	LP43 (Biodiversity) point 1: reword to "Development in the borough will only be permitted if it can be demonstrated it will achieve..."
413 Murphy	LP43 (Biodiversity) point 2: Phase 1 ecological surveys mostly conducted before biodiversity net gain was introduced. Will this be rectified for proposed allocations? If sites prove significantly less suitable as a result, will allocation be reconsidered? Eg Mushroom Castle.
413 Murphy	LP43 (Biodiversity) point 3: Given biodiversity net gain is required, why should development that can't avoid adverse impacts be permitted? Could this be explained?
413 Murphy	LP43 (Biodiversity) point 5: Should also apply to farmland to provide a reasonable baseline for assessing net gain. Farmland is a BFC BAP habitat. Would promote farmland biodiversity, currently in decline locally and nationally owing to land-use change, notably intensive agriculture in temperate regions including UK, and exacerbated in the borough by farmland loss to development.
413 Murphy	LP43 (Biodiversity) paras 16.1.3 and 16.1.4: farmland is missing from list It is one of six Bracknell Forest BAP habitats. Farmland area is declining nationally and in the borough (Defra data in the BAP: 26% loss 2006-2010; & large SA allocations since). Farmland biodiversity is being squeezed out by this loss, which exacerbates globally/nationally significant loss reliably ascribed to intensive agriculture. Since the Feb 2018 consultation, environmental threats are acknowledged globally, with potential impacts of biodiversity decline on food security increasingly flagged. If farmland is not added to habitat list here, please add text to explain why a BAP theme habitat is omitted.
413 Murphy	LP43 (Biodiversity) paras 16.1.7: What is the mechanism to ensure biodiversity gain at individual sites delivers net gain across the borough? i.e. How is it monitored and managed?
413 Murphy	LP43 (Biodiversity) paras 16.1.8 - 16.1.11: Important that this translates to biodiversity being given appropriate (=much higher) weight in the site selection and planning application processes.
413 Murphy	LP43 (Biodiversity) para 16.1.13: this should apply to farmland where biodiversity has suffered as a consequence of management. This does not indicate 'blame' but is a reasonable response to a land management situation that has led to biodiversity decline and conservation status for many farmland species. Approach likely to be supported by the new agriculture bill and environment land management schemes.
341 BBOWT	LP43 (Biodiversity): Several of greenfield allocations include arable farmland, so will have significant impact on farmland birds. Quote DEFRA guidance and consider that where possible on-site compensation, or otherwise off-site compensation should be provided for farmland birds where these are impacted, to ensure populations maintained in line with legislation. Notes that impacts on farmland birds will not be captured in biodiversity metric for calculating net biodiversity gain and need to be mitigated separately. Recommend farmland bird mitigation added to LP43.
383 BBOWT	<ul style="list-style-type: none"> <li>LP43 (Biodiversity): Welcome changes made to Section 1 of this policy. Whilst references to net biodiversity gain mentioned throughout consultation documents, no specific target set, apart from the Jealott's Hill site and in the Biodiversity measures section of the IDP. Consider that a specific biodiversity net gain target of 20% should be included, applicable to all developments. Higher target considered achievable without compromising deliverability of sites (see Lichfield District for example). Would have multifunctional environmental benefits, including sequestration of carbon.</li> <li>Would like further details about what constitutes 'relevant development' in part 2 of policy. Consider all new development should be exemplary in terms of integrating biodiversity features. Provided link to report published by Wildlife Trust <a href="https://www.wildlifetrusts.org/sites/default/files/2018-05/homes_for_people_and_wildlife_lr_-_spreads.pdf">https://www.wildlifetrusts.org/sites/default/files/2018-05/homes_for_people_and_wildlife_lr_-_spreads.pdf</a> provided table of features that could be included in developments to encourage biodiversity.</li> </ul>
340 BBOWT	LP43 (Biodiversity): Remain concerned that no reference to irreplaceable habitats (including, but not limited to, ancient woodland and veteran trees). Recommend LP43 includes "Development that would lead to individual or cumulative significant harmful effects on irreplaceable habitat will be refused unless there are wholly exceptional reasons where the public

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
	<b>LP43 – Biodiversity</b>
	benefit would clearly outweigh the loss or deterioration of habitat, and a suitable compensation strategy exists. The compensation strategy must be agreed with the Local Planning Authority".
867 C Wallen	Para 16.1.3 - farmland should be a biodiversity habitat.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
763 Willson Development	As it would be difficult to define what intentionally remove or degradation actually is, and how to prove that this has happened, this para should be removed: "Where the biodiversity has been intentionally removed or degraded (including through neglect), the Council will view biodiversity value to be as it would likely to have been had the removal or degradation not have occurred." Undoing years of neglect and improving a habitats' future prospects should be reasonably considered a mitigation measure as part of a development proposal.
Syngenta	Criterion 2i: second half of first sentence is duplicated.

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
	<b>LP44 – designated nature conservation and geological sites</b>
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
557 Warfield Parish Council	Policy supported.
960 Environment Agency	<p>LP44 Designated nature conservation and geological sites</p> <ul style="list-style-type: none"> <li>Request that the following sentence is included within this policy to ensure that the species within the nature conservation and geological sites are considered: "<i>protected species will be safeguarded from harm or loss</i>".</li> <li>the word 'normally' should be removed from point 1. ii. of policy LP44 as this would make the policy should be stronger and would ensure that SSSI's are protected from development.</li> <li>wording in part 1. iii. should also be strengthened as locally designated sites can have just as much importance as nationally designated sites and can support locally and nationally threatened wildlife. They provide essential wildlife refuges and contribute to the ecological network. We request that the wording is changed to reflect a stance that development proposals on or affecting locally designated sites will not normally be permitted.</li> </ul>
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
343 BBOWT	Accepts changes previously made to this policy.
410 Murphy	Policy for European sites in Bracknell Forest has reasonably evolved under the umbrella of the SPD for the TBH SPA. Air pollution was added as an additional potential threat in the early 2010s. Policy for TBH SPA now seems split between this policy on Appropriate Assessment for impacts including air quality, and LP 16 (Part 1, section 9.3) for leisure impact/SANG. Would it be better to have it all brought together, in a policy section for designated/European sites?
412 Murphy	LP44 (Designated nature conservation and geological sites): point i. Where there is no agreed mitigation strategy, how will in-combination impact (e.g. for air quality) be assessed at individual site application level, and translated to the borough level?
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
985 Wellington College	Eagle House requests boundary of Edgbarrow Woods LNR is revised to remove the long established playing fields from this designation. Do not contain features to warrant inclusion in LNR, Phase 1 habitat survey identified them as 'amenity grassland'.

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
	<b>LP45 – Protection and enhancement of trees and hedgerows</b>
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
524 Binfield Parish Council	No reference to construction of foundations should ensure that trees are not affected.
557 Warfield Parish Council	Policy supported.
894 Winkfield Parish Council	Wholeheartedly supports policy. Considers wording "of value" too vague – need to know what it means and who will decide.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
342 BBOWT	Welcome policy but remain concerned no reference to irreplaceable habitats in plan. Provided recommended wording for LP43.
412 Murphy	Great policy. Text could be reviewed to ensure consistency
412 Murphy	What does "of value" mean and who will decide? (Also 16.2.5)
500 Collings	Welcome policy, newly-planted tree or hedge does not have the
412 Murphy	Point B5 1: Implies both are essential in all cases, which would be ideal and mesh with global awareness and emerging policy. (2) Will there be guidance for urban/brownfield/greenfield/etc, with very different issues? e.g. How net landscape gain could be delivered on a greenfield site adjoining a rural settlement: inevitable urbanisation of landscape, so how is gain judged? Very welcome that this policy sets higher bar for landscape and biodiversity considerations.
412 Murphy	Paragraph 16.2.8: helpful to have this earlier in the section, when 'valued' first appears
412 Murphy	Paragraph 16.2.8 point vii: NPPF 2018 175c gives strong protection to ancient woodland and veteran trees, which should put them in a separate category to trees/hedgerows of 'value' for other reasons described here? It is unclear how high the bar will be set, how decisions made. Can this be clarified.
412 Murphy	Paragraph 16.2.10: Under what circumstances? This weakens the policy, elaborated well up to this paragraph.
412 Murphy	Paragraph 16.2.10 final sentence: Weakens policy which stipulates on-site landscape gain, provides a loophole, & risks development with poor landscaping.
412 Murphy	Paragraph 16.2.12: The RPA is designed to prevent adverse impact. Why might there be "no practical alternative solution"? e.g. a little less development might resolve the problem. Policy should not support adverse impact.
412 Murphy	Paragraph 16.2.14: Why might a landscaping strategy not be able to be submitted with the application? Again, this seems to weaken the policy.
412 Murphy	Paragraph 16.2.15: No problem with this for urban sites. (Where above caveats cater for urban or other specific situations, suggest making clear in what circumstances they apply.)
867 C Wallen	Large trees can be left marooned through development e.g. creation of polo fields. Repeated use of fertilizers/weed killers on grassed areas can cause long term damage to isolated trees or those on field margins (see trees in field off Hazelwood Lane). Is it possible to stipulate root exclusion zones for applying fertilizers/weedkillers to protect existing mature trees?
867 C Wallen	Para 16.2.10 - there shouldn't be exceptional reasons if trees and hedgerows are so important. Undermines the rest of this policy.
867 C Wallen	Para 16.2.12 - do not accept this as if harm is likely, don't site a building there. Trees inevitably grow which mean that they are hacked back to stop encroachment on a property.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
723 Escrillion	Object to current policy wording as it has the potential to undermine the viability and feasibility of new schemes coming forward as it does not allow for due consideration to be given to site-specific circumstances. Suggested re-wording: <input type="checkbox"/> Criterion 2(ii) – "creating green corridors through the site <b>around the site boundaries, and where possible, through the site</b> " <input type="checkbox"/> Criterion 2(iii) – " <b>Where possible</b> , making a specimen tree or group of trees focal points in the development". 7 <input type="checkbox"/> Criterion 2(iv) – " <b>Where possible</b> , fronting development onto significant trees or woodland; and, ". <input type="checkbox"/> Criterion 5 – "Proposals will be required to provide a net gain in landscape quality ...". This is on the basis that net gain is a metric term associated with biodiversity, not landscape quality. <input type="checkbox"/> Criterion 6 – as per above, reference to "net gain" in terms of landscape quality should be deleted.
723 Escrillion	Current policy wording at criterion (i) lacks a clear definition of what would constitute "larger developments which are not Local Plan allocations". A clear threshold needs to be set.
1000 Gladman	It is important that the criteria-based approach proposed reflects the provisions set out in NPPF Section 15, i.e. make clear distinctions between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight in decision making to their importance and the contribution that they make to wider ecological networks.

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
	<b>LP46 – Sustainable construction</b>
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
524 Binfield Parish Council	Queries whether policy goes far enough. How robust and objective will the assessment of whether can zero homes are viable be?  Why does this only apply to major developments? All net new homes should be aiming for zero carbon.
557 Warfield Parish Council	Policy supported.  A percentage of new homes should renewables.
894 Winkfield Parish Council	Support policy in principle. Threshold of major being 10 or more means many infill and windfall development would not have to meet requirement. Suggest 'major' is removed from item 'i'. 'ii' term 'unviable' should be defined in detail and not just a commercial decision. Should add a reference for "minimum 19% improvement..." or add "or any updated standard" as regulations will change over time. Item 'iv' seeking BREEAM excellent or equivalent contrary to clause 17.1.13 which states Council will seek at least BREEAM 'Very Good'. BREEAM requirement should be clarified. In 17.1.6 after "offset may be possible through planning contributions" suggest adding "including specific measures to offset carbon emissions".
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
500 Collings	Welcome this policy but all residential development should achieve zero carbon homes, with no get-out clause and non-residential development should meet the same net zero standards as residential development.
867 Wallen	Para 17.1.10 – how can household water usage be controlled to 110ltr/person/day? All new builds should include brown water storage tanks
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
716 Gladman	Proposed standards to meet climate change objectives should be thoroughly considered and tested through the proportionate evidence base, including any assessment of viability. Policy wording should accurately reflect the NPPF. Furthermore, LPAs should carefully consider and reflect the Government's approach to the setting of optional technical standards for new housing within local policies.
632 Pegasus on behalf of Redrow Homes and Persimmon Homes Thames Valley	Requirement for major developments to achieve zero carbon homes is unduly onerous. Building specification should be left to Building Regulations.  It is noted that criterion (ii) allows for a lesser standard. Neither this nor the zero carbon homes requirement features in the BNP Viability Assessment to assess whether this is achievable when factored alongside all other standards and requirements of the Plan.
763 Willson Development	Support the transition to low carbon futures and sustainable construction. Regards the ongoing MHCLG consultation on the Future Homes Standard, the Government proposes to remove the ability of local planning authorities to set higher energy efficiency standards than those in the Building Regulations. We therefore seek clarification of the definition and application of zero or low carbon policy in the draft Local Plan.
779 Boyer on behalf of W J Channing and Sons (Woking) Ltd Minstead Ltd and Markfield Ltd, 889 Boyer on behalf of Bloor Homes Ltd, 973 Boyer on behalf of Jordan Construction, 986 Wellington College	Zero carbon homes aspiration is onerous on developers - likely to result in reduction in affordable homes and S106 contributions.  Consider policy should be more flexible: <i>"i. All major new residential development should be designed <b>where possible</b> to achieve zero carbon homes, unless it can be clearly demonstrated that this is unviable, in such criterion ii will apply.</i>
655 Spitfire Bespoke Homes Ltd	Zero carbon homes aspiration is incredibly onerous on developers - likely to result in reduction in provision of affordable housing and S106 contributions. More flexibility should be added to this policy as follows: <i>"i. All major new residential development should be designed <b>where possible</b> to achieve zero carbon homes, unless it can be clearly demonstrated that this is unviable, in such criterion ii will apply ii. All other new residential development will achieve at a minimum a 19% improvement in the dwelling emission rate over the target emission rate, as defined in the 2013 Building Regulations".</i>
Syngenta	Clarification need on the definition and application of zero or low carbon policy.

<b>NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT</b>	<b>SUMMARY OF MAIN ISSUES RAISED</b>
	<b>LP47 - renewable and low carbon energy</b>
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
524 Binfield Parish Council	Policy supported.
894 Winkfield Parish Council	Supports policy but needs tighter controls and enforcement Clause 17.2.6 'limited renewable energy resource to support significant low carbon generation capacity' – how does BFC intend to meet its stated target of eradicating net contribution to climate change by 2050? Should investigate solar farms, heat pumps and biofuels further. Promote heat pumps and better insulation on new build residential properties rather than gas central heating.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
867 C Wallen	Need to accept that there will be some loss of visual amenity if the UK is to be able to exist on renewable energy. Referring to 'visual impacts' in this policy might severely hamper the ability to install renewables such as solar farms and wind turbines.  Ground source heat pumps in new builds should be encouraged.  Para 17.2.26 - where are the suitable wind turbine areas?
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
	None received.

<b>NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT</b>	<b>SUMMARY OF MAIN ISSUES RAISED</b>
	<b>LP48 – Sustainable Drainage Systems (SuDS)</b>
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
524 Binfield Parish Council	Suggest reference to permeable solutions only for paving and parking etc.
557 Warfield Parish Council	Recognises the importance of SuDS. Request that policy requires householders to install permeable driveways and paved areas wherever possible.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
	None received.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
763 Willson Development	Support. Consider that development should be permitted if all the following criteria are met <u>where possible</u> , and especially major developments should give priority to the use of SuDS.



NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
	<b>LP49 – Pollution and hazards</b>
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
524 Binfield Parish Council	Policy supported.
557 Warfield Parish Council	Policy supported, however considered this could go further in relation to light pollution, particularly in the countryside. Welcome the need for lighting assessments with applications.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
411 Murphy	Para 17.4.12 – 17.4.16: Agree strongly with minimizing light pollution, for health & wellbeing, biodiversity protection, landscape impact, etc.
411 Murphy	Paras 17.4.29-17.4.31: Concerned about air quality associated with LP5, especially with allocation of LP6: (i) impacts on AQMA; (ii) impacts on TBH SPA. Could tackling air quality on a site basis underestimate cumulative impacts? Is a mechanism in development to track/manage AQ borough-wide on European sites and develop mitigation strategy.
411 Murphy	Para 17.3.34: Very concerned at continuing failure of water courses to meet good status. What will be done to tackle the deficiencies listed in footnote 21 and improve their status? Is there capacity to collate information on what is going wrong and where, and work towards developing an action plan? Perhaps including local environmental groups, NGOs, charities, etc.
344 BBOWT	State that development on greenfield allocations will introduce artificial lighting into currently unlit areas. Opportunity to consider lighting strategically in terms of lighting used, how much and where used, as well as design, particularly for species affected by light at night. Suggest key principle is to keep dark corridors. Suggest should be conditions or covenants to control the type, power and direction of security and outside lighting that can be installed on homes and other buildings.
867 C Wallen	New developments invariably involves lit footpaths and open spaces. Such development in rural areas conflicts with dark skies. Can street lighting be turned off for some hours of darkness?
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
632 Pegasus on behalf of Redrow Homes and Persimmon Homes Thames Valley	iii) refers to “avoid locating sensitive uses in areas with existing or likely future pollution or hazards”. Whilst not made clear within the policy, this could include noise and air quality. The policy should be amended to make clear that proposals will be assessed against the residual adverse effects (i.e. with mitigation in place) and will only be resisted in such locations if the residual effects are unacceptable. This will avoid sterilising land, which could be made acceptable with mitigation.  The extent to which noise and air may influence development should be left to the planning application stage and tested against recognised industry standards.

<b>NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT</b>	<b>SUMMARY OF MAIN ISSUES RAISED</b>
	<b>LP50 – development of land potentially affected by contamination</b>
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
524 Binfield Parish Council	Agrees that proposals close to/on sites should only be approved with strict controls. However queries whether there are sufficient resources to manage regular monitoring and control. Particular concerns regarding Amen Corner South (SA8).
557 Warfield Parish Council	Policy supported.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
	None received.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
	None received.

<b>NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT</b>	<b>SUMMARY OF MAIN ISSUES RAISED</b>
	<b>LP51 – assessing transport impacts and requirements</b>
524 Binfield Parish Council	No mention of EV charging facilities.
557 Warfield Parish Council	Policy supported.
894 Winkfield Parish Council	Support requirements for Transport Assessments and Transport Statements but need more comprehensive approach to non-car modes of travel as part of wider move towards a zero net carbon Borough.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
411 Murphy	Paras 18.1.3 and 18.2.4: Meeting BFC's transport policies and requirements is clearly not achievable for LP 7. Dealt with further in comments against that policy. In general, it is good to see addressing transport issues acknowledged as very significant (essential) for meeting climate change policy and obligations.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
	None received.

<b>NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT</b>	<b>SUMMARY OF MAIN ISSUES RAISED</b>
	<b>LP52 – transport infrastructure provision</b>
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
524 Binfield Parish Council	No mention of EV charging facilities, or parking hubs for 'smart' vehicles (as well as taxis e.g. Zipcar).
557 Warfield Parish Council	Policy supported.  Strongly support the protection, enhancement and maintenance of public rights of way.
894 Winkfield Parish Council	Support policy in relation to improvements to public transport, but would like to see policy go further and require integrated approach to provision of public transport infrastructure i.e. home to work, home to school etc journeys, by multi-mode methods. Part 1 Clause 8.15 – journey times to London Waterloo remain poor compared to similar towns in Berkshire/ Surrey. Should have a stated aim to improve rail infrastructure between Bracknell and London Waterloo. Improvements needed in public transport to stations such as Martins Heron. Car parking is an issue at Martins Heron. Should also provide charging points.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
	None received.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
790 S2 Bracknell Ltd	Supports the policy. However consider the policy is too ambiguous in relation to requirement to provide taxi and rail infrastructure. Wording to be updated to include clarification on this. Policy also needs to be updated to reflect CIL being a primary funding source for new infrastructure, and make clear that it reflects site-specific mitigation as required by the CIL regulations.
723 Escrillion	Site-specific circumstances, feasibility and viability will need to be considered for each site with contributions only being sought if they meet all the relevant national tests as set out in paragraph 56 of the NPPF. This will ensure that development on sites, including development that has been strategically identified, is achievable and deliverable.

<b>NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT</b>	<b>SUMMARY OF MAIN ISSUES RAISED</b>
	<b>LP53 – travel plans</b>
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
524 Binfield Parish Council	No comment.
557 Warfield Parish Council	Policy supported.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
	None received.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
	None received.

NUMBER OF COMMENTS MADE BY TYPE OF RESPONDENT	SUMMARY OF MAIN ISSUES RAISED
	<b>LP54 – Parking</b>
<b>STATUTORY CONSULTEE / DUTY TO CO-OPERATE BODY</b>	
524 Binfield Parish Council	Parking is a major issue in Binfield. No development has adequate parking for residents or visitors.
557 Warfield Parish Council	Note that all relevant proposals must have regard to Council's current parking standards.
<b>RESIDENTS AND OTHER LOCAL ORGANISATIONS/GROUPS</b>	
	None received.
<b>DEVELOPERS / PROMOTERS OF SITES</b>	
789 S2 Bracknell Ltd	<p>Object to the policy. Any requirement to increase the amount of parking (as per point ii), in sustainable Town Centre locations should be removed. Current parking standards do not reflect this, and conflict with the NPPF aspiration to deliver high density housing in sustainable locations.</p> <p>Suggested amendments as follows:</p> <p>"1. Development will be approved which:</p> <p>i. provides vehicle and cycle parking (including parking for people with disabilities) and electric vehicle charging facilities <u>reflective of site location, access to amenities and sustainable transport modes in line with the NPPE</u>;</p> <p>ii. <del>improves the quality and/or increases the amount of parking in defined town centres where identified as being appropriate and needed;</del> and,</p> <p>iii. improves the provision, quality, convenience and security of public parking facilities for cycles.</p> <p><del>2. All relevant proposals must have regard to the Council's current parking standards.</del></p>
779 Boyer on behalf of W J Channing and Sons (Woking) Ltd Minstead Ltd and Markfield Ltd, 974 Jordan Construction, 987 Wellington College, 654 Boyer on behalf of Nicholas King Homes	Policy does not set out what standards are required by draft BFLP itself. Appears BFC seeking to rely on adopted Parking Standards SPD and successors. Should not be established outside of draft BFLP because cannot be interrogated or challenged at examination despite clear impact they may have on viability/ decision making. Cites: William Davis Ltd & Ors v Charnwood Borough Council [2017] EWHC 3006 (Admin) (23 November 2017) where a SPD strayed into an area that should be considered by a development plan document. Should BFC wish to adopt parking standards, these should be set out in BFLP.