

**TO: EXECUTIVE MEMBER FOR PLANNING AND TRANSPORT  
22 AUGUST 2017**

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**RESPONSE TO DRAFT WARFIELD NEIGHBOURHOOD PLAN  
(PRE-SUBMISSION CONSULTATION)**

**1 PURPOSE OF REPORT**

- 1.1 Warfield Neighbourhood Area was designated by Bracknell Forest Council on 23 July 2014. A Neighbourhood Development Plan for the area, which covers the whole Parish of Warfield, is being prepared for submission to the Council pursuant to The Neighbourhood Planning (General) Regulations (2012) (as amended) (“the Regulations”). In accordance with Regulation 14, Warfield Parish Council is required to undertake pre-submission consultation and publicity on its draft Neighbourhood Plan and send a copy of its proposals to the Local Planning Authority (Regulation 14(c)).
- 1.2 Warfield Parish Council has consulted Bracknell Forest Council, in its capacity as local planning authority, (“the Council”) on its draft Neighbourhood Plan. The purpose of this report is for the Executive Member for Planning and Transport to agree the Council’s response to the consultation.

**2 RECOMMENDATION**

- 2.1 **That the Executive Member for Planning and Transport approves the Council’s response to Warfield Parish Council on its draft Neighbourhood Plan as set out in Appendix A.**

**3 REASONS FOR RECOMMENDATION**

- 3.1 The reason for this recommendation is that the Council has a statutory duty set out in paragraph 3(1) of Schedule 4B of the Town and Country Planning Act 1990 (as amended) (“the Act”) to provide advice and assistance to qualifying bodies undertaking neighbourhood planning.

**4 ALTERNATIVE OPTIONS CONSIDERED**

- 4.1 The alternative option is for the Council not to respond to the pre-submission consultation, but for reasons explained at paragraphs 6.2, 6.5, 6.6 and 6.7 of the report, officers consider a response should be provided at this stage, in the spirit of co-operation and broad compliance with its statutory duty.

**5 BACKGROUND INFORMATION**

- 5.1 Warfield Parish Council is the qualifying body for the purposes of neighbourhood planning in Warfield, and applied for the designation of the Neighbourhood Area in April 2014. Following a six week consultation on the proposal in April/June 2014, this Council designated Warfield Parish as a Neighbourhood Area for the purposes of Neighbourhood Planning on 23 July 2014.
- 5.2 Warfield Parish Council notified the Council of the pre-submission consultation on their draft Neighbourhood Plan on 18 July 2017 and the consultation runs until 8 September 2017. The pre-submission Neighbourhood Plan contains 13 policies covering the following topic areas:

- An allocation of land for residential development at Hayley Green, with supporting infrastructure
- Promoting good design
- Retaining local gaps
- Supporting rural affordable housing
- Enhancing the green infrastructure network
- Protecting local green space
- Protecting community facilities
- Supporting rural diversification
- Protecting and Enhancing Heritage and Biodiversity
- Minimising light pollution
- Supporting drainage infrastructure
- Appropriate parking

5.3 Warfield Parish Council is undertaking this consultation in accordance with Regulation 14 of the Regulations. Regulation 14(a)(iv) requires that the qualifying body must publicise the draft proposal for a minimum of 6 weeks. Regulation 14(c) requires that the respective qualifying body sends a copy of the proposal to the local planning authority.

## **6 BRACKNELL FOREST COUNCIL'S RESPONSE**

### Context

6.1 The Council has a statutory duty set out in the paragraph 3 of Schedule 4B of the Act to provide advice and assistance to qualifying bodies undertaking neighbourhood planning.

6.2 It is considered that providing comments and suggested amendments on the pre-submission consultation forms part of this duty. Responding with detailed comments to this consultation provides Warfield Parish Council with the opportunity to address any concerns from the Council and to amend the Neighbourhood Plan accordingly. It is hoped that the comments made will assist in the preparation of a robust Neighbourhood Plan for submission, subsequent consultation, examination, referendum and bringing into effect.

### Internal Consultation

6.3 Comments have been sought from officers in other service areas where proposed policies relate to their area of work and expertise. These service areas include Children Young People and Learning, Parks and Countryside, Planning, Highways and Transport, Environmental Health, Business Enterprise and Public Health. In addition to seeking written comments, the internal consultation has involved workshops with other officers to discuss the draft Warfield Neighbourhood Plan (WNP).

### Details of Response

6.4 The WNP will form part of the Development Plan once 'made.' Therefore it is important that the Council provides comments on wording in the Neighbourhood Plan to ensure policies are clear and unambiguous, enabling a decision maker to apply policies consistently and with confidence when determining planning applications.

6.5 Whilst the Council does not have a legal obligation to consider or assess the content of Neighbourhood Plans in relation to the 'basic conditions' (as set out in Schedule 4B, paragraph 8(2) of the Act) until after the Examination, National Planning Policy

Guidance states that a local planning authority should provide constructive comments on an emerging plan. It also states that if it is considered that a draft neighbourhood plan falls short of meeting one or more of the 'basic conditions', such concerns should be discussed with the qualifying body so that these can be considered before the draft neighbourhood plan is formally submitted.

6.6 Therefore, compliance with the 'basic conditions' has been borne in mind in preparing the Council's response. In particular, officers have looked at whether the pre-submission Neighbourhood Plan appears to be on track with regard to national policies and advice, and being in general conformity with strategic policies contained in the Development Plan. At the Examination stage, the independent examiner will test whether or not the Neighbourhood Plan meets the 'basic conditions', amongst other matters.

6.7 The Council has carefully considered the content of the draft WNP and has identified the following main technical issues that are set out in Appendix A of this report and summarised below:

- The link between the WNP objectives and policies needs to be clearly set out.
- The terminology used in the Plan needs to be clearer in terms of meaning to ensure that policies are implemented in a consistent way. To assist this, the Neighbourhood Plan would benefit from having a glossary that defines terms used.
- The policies and supporting text need to be more clearly linked to the evidence base used to inform policies.
- Amendments are required to ensure consistency with BFC's policies map, in particular the locational principles for development set out in Core Strategy Development Plan Document policy CS2 and Green Belt policy set out in the National Planning Policy Framework (NPPF).
- The evidence and justification underpinning the allocation for residential development at Haley Green needs to be clearly set out, with explanation as to how this has informed development layout on the concept masterplan.
- Further clarification is required in terms of proposals to maintain 'local gaps' to avoid the coalescence of settlements and the separation between settlements and countryside.
- Justification for rural exception affordable housing policy and safeguarding measures is required.
- Green Infrastructure Network sites need to be reappraised to ensure exhaustiveness and appropriateness, and to avoid conflict with the Council's strategic development plan policies.
- The reasoning behind the choice of local green space designations and community assets needs to be clearly set out to demonstrate consistency.
- Greater consideration for 'blue infrastructure' and Sustainable Drainage Systems (SuDS) is required in the development of policies.

6.8 The Council's full response to the pre-submission consultation on the WNP is set out in Appendix A. (This includes a covering letter that highlights the main technical issues together with an associated schedule which deals with these points in greater depth and which covers other editorial/ presentational points).

#### Next Stages

6.9 Following the close of the pre-submission consultation, the next stage is for Warfield Parish Council to consider comments received and make any amendments it considers appropriate. Once the Neighbourhood Plan has been prepared, it must

then be submitted to the local planning authority, checked for legal compliance and publicised for a minimum of six weeks (Regulation 16 consultation). It is then subject to examination by an independent examiner who will check that it meets the 'basic conditions' and then issue a report. The local planning authority must then consider the report and make a decision on whether to hold a referendum on the WNP. If the referendum is successful, the Council will be required to 'make' the Warfield Neighbourhood Plan and bring it into legal force. The Plan will then form part of the Bracknell Forest Development Plan and would be used in the determination of planning applications relating to land in Warfield Parish.

#### Resource Implications

- 6.10 As indicated above, this Council, as local planning authority, has a statutory duty to provide advice and assistance and to carry out certain parts of the neighbourhood planning process, including holding and arranging the examination and the referendum.
- 6.11 The Council has already received £5,000 of Government grant funding following the designation of the Warfield Neighbourhood Area. A further £5,000 will be available to claim once the Council has completed the Regulation 16 consultation, and an additional £20,000 will be available for the Council to claim upon receipt of the Examiner's report which will help fund the referendum on the Neighbourhood Plan.
- 6.12 The work of supporting the preparation of the Warfield Neighbourhood Plan has been carried out by staff within the Spatial Policy section (with support from the Council's GIS team), as this section has access to relevant data and experience of preparing planning policy. To date the work has been resourced from within existing budgets supplemented by the grant money from Government. As set out above, there will be future financial resource implications in arranging the Examination and referendum of the Neighbourhood Plan.

## **7 ADVICE RECEIVED FROM STATUTORY AND OTHER OFFICERS**

### Borough Solicitor

- 7.1 The recommendation of the report seeks the Executive Member of Planning and Transport's approval of the Council's formal response to draft Warfield Neighbourhood Plan submitted by Warfield Parish Council, detailed comments are as set out in Appendix A.
- 7.2 Neighbourhood planning is a relatively new legal process, which the Council has a statutory duty to facilitate and administer. The Act, Regulations and the Local Government (Functions and Responsibilities Act) England Regulations 2010 are silent as to the appropriate decision making process. Consequently and given the recent enactment of these provisions, the Bracknell Forest Borough Council Constitution May 2017 is also silent as to the mode or reservation of such decisions.
- 7.3 Broadly speaking key decisions include the designation of Neighbourhood Areas, qualifying bodies, the making of Neighbourhood Development Plans, Neighbourhood Development Orders and the holding of referendums.
- 7.4 Consideration has been given to the nature of and the appropriate level at which Neighbourhood Planning decisions can be made, whilst ensuring the process is fair and transparent.

- 7.5 The Regulations are directed at the Council as Local Planning Authority, although, most decisions are of an administrative nature and to be taken against a specific set of criteria (e.g. as to the characteristics of a qualifying body). Therefore, it is considered that most Neighbourhood Planning decisions can be taken either by the Executive Member for Planning and Transport or the Chief Officer for Planning and Transportation.
- 7.6 In accordance with Section 5 of the Bracknell Forest Council Constitution 2015. Paragraph 5.7 the Executive Member has authority to agree the recommendation in relation to his area of responsibility.
- 7.7 Further, the Executive Member will note that, whilst applications for a Neighbourhood Development Plan (post designation of a qualifying body or Neighbourhood Area) are submitted to the Local Planning Authority, this process does not entail making new planning policy. Neighbourhood Development Plans must first and foremost be in general conformity with the strategic policies of the Development Plan, thus amounting to administrative decisions which do not require the exercise of substantive discretion. Therefore, the implementation of these administrative decision making processes in relation to Neighbourhood Planning falls within the Executive Member for Planning and Transport's individual decision making remit and he is advised to approve the recommendation.

#### Borough Treasurer

- 7.8 There are no financial implications for the Council in responding to the pre-submission consultation. However, as stated in the report, there are future costs for the Council in relation to the Examination and referendum. The Council will be able to apply for a grant towards the additional costs involved in this work. The ongoing use of staff resources can currently be met from within existing budgets.

#### Equalities Impact Assessment

- 7.9 An Equalities Impact Assessment is not considered relevant as the policies do not prejudice any particular section of the community and the Council has not prepared the policies.

## **8 CONSULTATION**

- 8.1 The Council has been consulted by Warfield Parish Council on its Neighbourhood Plan pre-submission consultation (Regulation 14 consultation).
- 8.2 Internal consultation has been undertaken with relevant service areas in compiling the response set out in Appendix A, as described in paragraph 6.3 above.

#### Background Papers

- The Neighbourhood Planning (General) Regulations 2012 (as amended 2015)
- Town and Country Planning Act 1990
- Warfield Parish Neighbourhood Area Designation: <https://www.bracknell-forest.gov.uk/planning-and-building-control/planning/planning-policy/neighbourhood-planning/warfield-neighbourhood-area>
- Warfield Parish Council draft Warfield Neighbourhood Plan pre-submission consultation: <http://warfield-np.org.uk/>

Appendices

A – Bracknell Forest Council's response on the pre-submission draft Warfield Neighbourhood Plan

Contact for further information

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**Appendix A: Bracknell Forest Council's response on the pre-submission draft Warfield Neighbourhood Plan**



Jason Mawer  
Clerk to the Council  
Warfield Parish Council

By email to: [info@warfieldparishcouncil.gov.uk](mailto:info@warfieldparishcouncil.gov.uk)

8 September 2017

Dear Jason

### **WARFIELD NEIGHBOURHOOD PLAN PRE-SUBMISSION CONSULTATION**

Thank you for your email dated 18 July 2017, concerning the above. Bracknell Forest Council is generally supportive of the Plan and appreciates all the work invested in the process by those involved.

The Council would like to make some comments on technical issues (including matters that touch on the 'basic conditions') and some additional editorial/presentational comments. Whilst the technical issues are outlined below, they are dealt with in more detail in the associated schedule. These comments represent a combined response from different services areas across the Council.

Technical comments are as follows:

- The link between the WNP objectives and policies needs to be clearly set out.
- The terminology used in the Plan needs to be clearer in terms of meaning to ensure that policies are implemented in a consistent way. To assist this, the Neighbourhood Plan would benefit from having a glossary that defines terms used.
- The policies and supporting text need to be more clearly linked to the evidence base used to inform policies.
- Amendments are required to ensure consistency with BFC's policies map, in particular the locational principles for development set out in Core Strategy Development Plan Document policy CS2 and Green Belt policy set out in the National Planning Policy Framework (NPPF).
- The evidence and justification underpinning the allocation for residential development at Haley Green needs to be clearly set out, with explanation as to how this has informed development layout on the concept masterplan.
- Further clarification is required in terms of proposals to maintain 'local gaps' to avoid the coalescence of settlements and the separation between settlements and countryside.
- Justification for rural exception affordable housing policy and safeguarding measures is required.
- Green Infrastructure Network sites need to be reappraised to ensure exhaustiveness and appropriateness, and to avoid conflict with the Council's strategic development plan policies.
- The reasoning behind the choice of local green space designations and community assets needs to be clearly set out to demonstrate consistency.



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- Greater consideration for 'blue infrastructure' and Sustainable Drainage Systems (SuDS) is required in the development of policies.

We welcome the opportunity for on-going discussion relating to the preparation of your Neighbourhood Plan and associated submission documentation.

Yours sincerely

A handwritten signature in black ink, appearing to read 'A.P. Hunter', with a long, sweeping flourish extending to the right.

Andrew Hunter  
(Chief Officer: Planning and Transport)

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Policy/ Para. Number	Suggestion	Comment
<b>Comments on the pre-submission draft Warfield Neighbourhood Plan</b>		
General comment - whole document		Reference to BFC planning policy documents and abbreviations should be checked to ensure they are correct and consistent.
General comment – all policies		Bullets should be numbered to enable accurate referencing.
General comment – green infrastructure		The inclusion of policies within the neighbourhood plan focused on green infrastructure, protecting the environment, biodiversity and promoting dark skies is welcomed. The plan should however include reference to the Bracknell Forest Biodiversity Action Plan, which supports these themes and includes partners such as Warfield Parish Council and Warfield Environment Group.
General comment – maps/plans		The keys on plans/maps throughout the Plan are incomplete. All colours/features on a plan should be referenced.
1.3	Consistency	Change “...Warfield Neighbourhood Development Plan...” to “Warfield Neighbourhood Plan”. Consistency is needed with the title of the plan throughout the document. It should be referred to as the “Warfield Neighbourhood Plan” as opposed to the “Warfield Neighbourhood Development Plan”.
1.3	Amendment to text	1 <sup>st</sup> sentence: instead of “Bracknell Forest Council”, use ‘BFC’.
1.6	Amendment to text	To avoid confusion, the term ‘making’ in the paragraph: “...the process of making its Neighbourhood Plan...” should be changed to ‘drafting’.
2.3	Amendment to text	Bus routes referred to should be updated to bus routes 53, 157, 158, 162, 299 that are all operated by Courtney Buses and all are council supported.
2.5	Additional policy	Cabbage Hill is detailed here as providing excellent views of the surrounding area. Suggested that the Plan could include a policy that seeks to protect the upper parts of Cabbage Hill from development, to create a gap between Warfield and Binfield in terms of the more urban parts of the Parish.
2.13	Amendment to policies map	Makes reference to the borough council’s SPA Mitigation Strategy including the ‘Bull Brook’ river corridor as a key component. However, this is not included in the current Thames Basin Heaths Special Protection Area (SPA) Supplementary Planning Document (SPD). While this is likely to be an important aspect of green infrastructure, it currently has no planning status as a group of sites. Recommend this is identified as part of the Plan’s Green Infrastructure Network in Policy 6.
2.19	Comment	Summarises results of the resident survey which includes “a strong desire to retain and allocate more public open space, recreate wildlife meadows and the planting of more trees.” This is welcomed as an opportunity for the neighbourhood plan and further action, guided by the next Biodiversity Action Plan in addition to planning processes.

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Policy/ Para. Number	Suggestion	Comment
2.22	Amendment to text	Suggest change the term “countryside gap”, as there is potential for confusion with the identified “gaps” in Policy 4 and policies map; and this area includes a number of defined settlements.
2.23	Amendment to text	Add text: “...objectively assessed housing need <b>in Bracknell Forest</b> (635 dwellings per year <b>as identified in the Berkshire (including South Bucks) Strategic Housing Market Area Assessment 2016</b> ) this pressure...”
2.29	Amendment to text	Change “exiting” to “existing”.
2.30	Amendment to text	Fourth bullet point: change “SANGs” to “SANG”.
2.32	Amendment to text	Add text: “...at Blue Mountain <b>in Binfield</b> and recreation...”.
2.36	Amendment to text	Delete reference to “Tilehurst Lane, Binfield APP/R0335/W/15/ 3139035”, as this decision was subsequently quashed.
3.2	Amendment to text	Reference should also be made to the Planning Practice Guidance (PPG) as it includes guidance on neighbourhood plans. The PPG can be found here: <a href="https://www.gov.uk/government/collections/planning-practice-guidance">https://www.gov.uk/government/collections/planning-practice-guidance</a>
3.2	Amendment to text	Recommend adding the following paragraphs relevant to policies in the neighbourhood plan: <ul style="list-style-type: none"> <li>• 99 – relating to climate change with reference to flooding and green infrastructure</li> <li>• 125 – relating to light pollution</li> </ul>
3.4	Clarification	The BFC development plan strategic policies have been defined for neighbourhood planning purposes. It is not clear whether the listed policies are considered to be strategic policies. This needs clarifying. For reference of the policies listed the following are considered to be strategic policies: EN3, EN4, EN10, CS1, CS2, CS5, CS6, CS8, CS9, CS14, CS15, CS16, CS17, CS23 and SA9.
3.6	Amendment to text	Amend to “...will replace many existing Development Plan policies early in the lifetime...”. Not all development plan policies will be replaced as it is likely that policies in the SALP are going to be ‘saved’ and work on the Minerals/Waste Local Plans is separate to CLP. Binfield NP also forms part of the Development Plan, and will not be replaced as part of the CLP.
3.7	Clarification	3 <sup>rd</sup> sentence: states that a further 10% of housing supply over the 2,200 allocated in to the parish by Policy SA9 would best reflect the constraints, lack of previously developed land and research by DLG. The housing requirement is mentioned in paragraph 2 on page 3 in the Warfield Neighbourhood Plan Housing Site Assessment Report April 2017 however there is limited information on the approach taken. It should be made clear in this paragraph that the figures here (notably the 2,200) cover the period to

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Policy/ Para. Number	Suggestion	Comment
		2026. There is concern over how this figure has been derived as the NPPF requires the assessment of full housing needs to be done via a Strategic Housing Market Assessment (para. 159). Indeed, the most up to date evidence base for Bracknell Forest housing need is the 'Berkshire (including South Bucks) Strategic Housing Market Assessment (SHMA)' (February 2016).
3.7	Amendment to text	3rd sentence: need to include the document title referred to as "...research by DCLG (June 2015)...".
Plan E	Amendment to figure	There is no key on Plan E. This should be added.
Plan E	Add reference	Cannot find reference to Plan E.
4.13 to 4.17	Amendment to text	These paragraphs do not seem to relate to the sub heading of Infrastructure. In particular there does not seem to be any reference to key aspects of infrastructure such as education, open space and community or health facilities.
5.2	Clarification	It is unclear how the objectives link to the plan policies. The Neighbourhood Plan policies should help to achieve the Plan objectives. For example, objective (bullet 1) aims to limit further incursion into the open countryside, however Policy 2 – Hayley Green seeks to allocate development in the countryside; Policy 11 seeks to promote dark skies, but this is not an objective of the Plan so it is questioned why there is a policy on this subject; there is no objective to deliver rural exception affordable housing sites but Policy 5 does this etc. It should also be noted that through work on the Comprehensive Local Plan, further sites outside of current settlement boundaries may be required in Warfield parish beyond those identified in the Neighbourhood Plan.
5.2	Amendment to text	2 <sup>nd</sup> and 3 <sup>rd</sup> bullet points are very similar – suggest merging.
5.2	Amendment to text	4 <sup>th</sup> bullet point: The current wording only conserves what currently exists and places value on specific types of natural asset i.e. trees, hedgerows, wetlands and wildlife sites. This misses a wide range of habitats such as the wildflower meadows that residents expressed an interest in. Recommend amendment to: Conserve <b>and enhance</b> the existing network of <b>wildlife habitats including</b> trees, hedgerows, <b>grasslands, waterbodies</b> and <b>local</b> wildlife sites and improve access to the countryside.
5.3	Amendment to text	Authority monitoring reports do not collect data per se, but evaluate the effectiveness of plan policies. In the 2nd sentence it is mentioned that the Neighbourhood Plan objectives "...will form the core of the

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Policy/ Para. Number	Suggestion	Comment
		<p>monitoring activity...” It is the Neighbourhood Plan policies rather than the objectives which will be monitored as councils are required to monitor the implementation of policies.</p> <p>In addition, it should be clarified that the proposed review of the WNP would be undertaken by Warfield Parish Council. It is not the responsibility of BFC, even once it forms part of the Development Plan.</p>
All policies	Amendment to text	Each policy paragraph and bullet point should be numbered to enable accurate referencing. There also needs to be consistency between policies as bullets, letters numbers and roman numerals have been used.
All policies	Amendment to text	Policies should be relabelled Policy WNP1, Policy WNP2 etc. to ensure consistency with map and plan references.
Policy 1	Amendment to text or consider deletion of the policy and setting out the spatial strategy in the supporting text.	<p>Policy 1 should be amended to address the following points:</p> <ul style="list-style-type: none"> <li>- Not considered to be consistent with policy CS2, as it appears to impose different policies for each defined settlement, whereas Policy CS2 is clear: “Development will be permitted within defined settlements and on Allocated Sites.” For example Policy 1 appears to state that (undefined) urban development is not appropriate within the defined settlements of Newell Green, Warfield Street or Hayley Green.</li> <li>- 1st paragraph: “Development that is suited to an urban setting...” is not defined which will make it difficult to implement the policy.</li> <li>- The Warfield Neighbourhood Plan: Policies Map does not define the boundaries of the Warfield extension (SA9), Whitegrove, Quelm Park, Lawrence Hill and Warfield Park referred to in the policy. The areas the policy applies to needs to be defined.</li> <li>- Warfield Park is currently in the countryside but the second sentence reads as though it is in the urban area.</li> <li>- Unclear of the significance of the words “limited infill” in 3<sup>rd</sup> para.? Does this mean other forms of development are not supported? Or does it mean other types of development are exempt from the provisos of this policy?</li> <li>- The numbered points in Policy 1 appear to be covered by other policies in the NPPF, the development plan or elsewhere in this plan.</li> <li>- This policy appears to exclude any reference to the existing defined settlement of Hayley Green. Policy 2 is a site allocation policy and doesn’t include policies for the existing village.</li> <li>- Point 1.: ‘Local dwellings’ could mean any local dwelling in the area, including those unsympathetic to the local character which could be used to promote inappropriate development. It is better to define local character. This policy should cross reference to the findings of the WNP Character</li> </ul>

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Policy/ Para. Number	Suggestion	Comment
		<p>Assessments, or place the recommendations of this work and the Character Area Assessments SPD into the actual policy. Defining good design for the Plan area as a whole is also needed. BFBLP saved policy EN20 is considered to sufficiently cover this topic area.</p> <ul style="list-style-type: none"> <li>- Point III replicates BFBLP saved policy EN20 and therefore may not be necessary.</li> <li>- The wording of point IV implies that the green infrastructure (GI) needs to be implemented when much of GI is existing. It is important that developments protect existing features as well as provide for future implementation.</li> <li>- 4<sup>th</sup> paragraph: Inconsistent, as the “countryside gap” contains a number of defined settlements.</li> <li>- 4<sup>th</sup> paragraph: the policy wording is not clear in terms of what the policy is trying to achieve. The policy is more lenient than the NPPF which states that new buildings in the Green Belt are inappropriate, unless specified exceptions (paragraphs 87, 88, 89 &amp; 90), or there are very special circumstances. It also does not reflect that there are different policies in the NPPF and the BFC Development Plan for countryside in the Green Belt and for countryside outside of the Green Belt. It is therefore considered that as it currently reads, this paragraph would not meet the basic conditions as it is not consistent with the NPPF.</li> <li>- The use of the word “appropriate” should be restricted to discussion of proposals within the Green Belt.</li> <li>- The “countryside gap” needs to be defined on the Policies Map. This policy is attempting to do too much and in places it is in conflict with existing adopted policies and the NPPF. It would be safer to delete it completely and deal with the spatial framework for the parish in introductory text with cross reference to the NPPF and policies in the development plan.</li> </ul>
5.10	Amendment to text	The suggestion of limiting new development within defined settlements to “limited infill” would conflict with Policy CS2.
5.11	Clarification	Replace “Strategic Allocations Local Plan (SALP)” with “SALP”.
5.12	Amendment to text	Replace “cul-de-sac plots” with “cul-de-sac developments”.
5.12	Amendment to text	Last sentence: replace “undermine” with “protect”.
5.13	Amendment to text	1 <sup>st</sup> sentence: delete either “Hence” or “therefore” and replace “communities” with “community’s”.
Policy 2	Observations	The proposed site allocation at Hayley Green has been promoted and included in the Strategic Housing and Economic Land Availability Assessment: Part 2 Results (August 2017) (SHELAA) through sites

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Policy/ Para. Number	Suggestion	Comment
		WAR13, part of WAR14, WAR15 and WAR16. The south eastern corner of the site is not in the SHELAA. It is not clear whether this part of the site is available for development as this information is not in the Warfield NP Site Assessment and Capacity Study. Evidence needs to be provided that this part of the site is available, suitable and achievable for development as it has not been assessed in the SHELAA. Was a separate call for sites process undertaken for the Neighbourhood Plan? It is unclear from the evidence whether or not landowners have been notified about the proposed allocation or whether a wider area was considered (in light of part of the proposed allocation not being in the SHELAA).
Policy 2	Amendment to text	Suggest a different policy heading as this policy relates only to an allocated site, not the whole settlement of Hayley Green.
Policy 2	Clarification	Points (a) and (iii): “starter” homes needs to be defined.
Policy 2	Amendment to text	Point b: Replace “informal ‘wild’ play” with “ <b>informal play using natural materials</b> ”. The term wild play is too ambiguous.
Policy 2	Amendment to text	Point c.: business use should be separated from community hub as this is a separate use. Reference should be made to the size of community hub and quantum and type of business use being proposed (based on evidence and justification), with consideration given to whether this is an appropriate location for such a use.
Policy 2	Amendment to text	2 <sup>nd</sup> paragraph: change “Proposals must be made as part of a comprehensive planning application for the whole site and should include:...” to “The whole allocation should be delivered as one single outline planning application to ensure that the site is developed comprehensively. Any planning applications for piecemeal development that would undermine this objective will not be supported. The application should include:...” to ensure that the whole site is comprehensively developed.
Policy 2	Amendment to text	Point i: Policy should require a Detailed Masterplan to be submitted for approval prior to any planning applications being submitted. The masterplan should include a detailed access and movement strategy showing footpath and cycleway connectivity to existing facilities in the area.
Policy 2	Amendment to text	Point ii: change to: “An Infrastructure Delivery Plan that demonstrates the delivery of infrastructure in accordance with policy requirements” to ensure that individual development parcels are not considered in isolation. Suggest points ii. and xii. are merged as they cover similar issues.
Policy 2	Amendment to text	Clause v only relates to listed buildings – this conflicts with SEA Objective 2 Heritage which goes beyond only considering listed buildings. This is not identified in the SEA of the policy (page 25).

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Policy/ Para. Number	Suggestion	Comment
Policy 2	Comment	Point vi. – strongly supported as an effective means for protecting and enhancing biodiversity alongside vii. for a flood risk assessment.
Policy 2	Amendment to text	Point vi: add text "...existing environmental assets, <b>including trees</b> , will be protected...". Reference should also be made to mitigating the impact on environmental assets with the proposed cycleway along Forest Road.
Policy 2	Amendment to text	Point vii.: <ul style="list-style-type: none"> <li>- Surface water risk on site will also need to be dealt with.</li> <li>- Criterion makes reference to a FRA demonstrating that the development proposal will not increase surface water flood risk on any adjoining land. This does not fully accord with the Site Specific Flood Risk Assessment Checklist in the NPPF (Paragraph:068 Reference ID:7-068-20140306) Point 5: Site Specific Flood Risk criterion g. The checklist states "How will you ensure that the development and any measures to protect the site from flooding will not cause any increase in flood risk off site and elsewhere". This is reinforced in Point 6: Surface Water Management criterion d which states "How will you prevent run-off from the completed development causing an impact elsewhere". These statements appear to be broader in intent than the reference to "adjoining land" in Policy 2 vii. It is suggested that criterion vii is therefore amended.</li> </ul>
Policy 2	Amendment to text	Point xii.: change to: "Supporting infrastructure (including land) secured by planning obligation".
Policy 2	Amendment to text	Point xi – the Design SPD should also be referenced.
Policy 2	Background information – Air Quality	<p>BFC produced the HRA Screening Report last year. Amongst the conclusions was that the residential development proposed in the WNP is unlikely to generate more than 1000 visits per day on the road network within 200m of the forest. Therefore no significant effect is likely.</p> <p>A recent high court judgement means that this conclusion above may now be questionable. In March 2017, a high court judgement quashed part of the Lewes Joint Core Strategy. This judgement related to the assessment of nitrogen deposition impacts from increased traffic flows on European Nature Conservation sites and the potential for in-combination effects. Bracknell Forest Council is still considering the implications of this judgement for its new Local Plan (in association with other local authorities and Natural England). The likelihood is that BFC will need to:</p> <ul style="list-style-type: none"> <li>- identify road link points within 200m of Natura 2000 sites, which may be used by vehicle journeys arising from Bracknell Forest as a result of increased population, then use strategic transport modelling, which takes account of growth outside of the Borough, to identify the change of flows</li> </ul>



Unrestricted

Policy/ Para. Number	Suggestion	Comment
		<p>predicted on these road links. This process will attempt to identify where there may be adverse effects on the integrity of the European Sites (within the vicinity of Bracknell Forest – these are likely to be Thames Basin Heaths Special Protection Area (SPA) and Windsor Great Park Special Area of Conservation (SAC). If BFC can identify development locations in Bracknell Forest which may lead to potential significant adverse effects on air quality on the European sites, these development locations (potentially Hayley Green) may need to carry out more detailed air quality assessments at the planning application stage.</p>
Policy 2	Additional policy	<p>Last paragraph: This policy requires SPA mitigation. There is however no such wording in the other policies which may lead to a net increase in residential development e.g. Rural Exception Housing Policy and the Rural Diversification Policy, Local Gaps policy etc. It may be preferable to remove the SPA paragraph from the Hayley Green Policy and include a separate policy on avoidance and mitigation measures for European Sites as follows:</p> <p>“Development shall include measures to avoid and mitigate the impact of residential development upon European Nature Conservation Sites in agreement with the Council and Natural England. This will include the provision of a bespoke SANG for the residential development at Hayley Green, financial SANG contributions for any small net increases in residential development arising as a result of this neighbourhood Plan, a financial contribution towards Strategic Access Management and Monitoring and any other measures that are required to satisfy Habitats Regulations, the Councils Thames Basin Heaths SPA Avoidance and Mitigation Strategy and relevant guidance.”</p> <p>This approach ensures that all relevant potential development arising from the WNP will need to provide avoidance and mitigation measures relating to European sites and addresses the potential need for an air quality assessment for the Hayley Green site at the planning application stage.</p>
Policy 2	Observation	<p>It is not clear how constraints such as landscape, ecology or flood risk have shaped the concept masterplan which supports Policy 2.</p> <p>The emerging Landscape Sensitivity Appraisal of Potential Housing and Employment Sites in Bracknell Forest Borough (Draft, 2017) has assessed landscape sensitivity of the SHELAA sites WAR13, WAR14, WAR15 and WAR16. All of the sites have been identified as having medium to high landscape sensitivity. An assessment of the sites when clustered together has concluded that: “The area west of Hayley Green, fronting Forest Road, has a lower sensitivity because of the existing development</p>

Unrestricted

Policy/ Para. Number	Suggestion	Comment
		<p>footprint, the proximity to the settlement edge of Bracknell (due to development on the Warfield allocation), and its better potential relationship with the settlement pattern. “</p> <p>The draft Phase 1 Ecological Survey (2017) has assessed the ecology of the SHELAA sites WAR13, WAR14, WAR15 and WAR16 as a cluster. The survey has identified that the northern part of the cluster fronting Bracknell Road has the highest ecological value with a “moderate ecological constraint.” The southern part of the site fronting Forest Road has a “low ecological constraint”.</p> <p>The Bracknell Forest Borough Stage 1 Strategic Flood Risk Assessment (SFRA) has assessed the site’s risk of flooding. The western side of the adjacent to Hayley Green has the greatest risk of groundwater flooding. A small part of the site in the north east is within Flood Zone 3 and is therefore at high risk of pluvial flooding. The area in Flood Zone 3 increases slightly when climate change is taken into account.</p> <p>Whilst it is noted that this information was not available at the time the draft Neighbourhood Plan was drawn up, the conclusions of these studies should now be used to inform the masterplan in terms of determining the location of development, access and open space. The studies have yet to be finalised and published but they can be made available to the Parish Council.</p>
5.15	Amendment to text	Delete “multiple” to read better.
5.15	Amendment to text	The “Hayley Green Masterplan” should be referred to as a “Concept Plan”. The policy inset map detailed as a Concept Masterplan does not include sufficient information to be called a masterplan. Reference to a masterplan in this context is misleading, as Policy 2 requires a masterplan as part of the allocation.
5.17	Amendment to text	Replace “cycle” with “footpaths”? As shown in Appendix F, Hayley Green is not currently connected to the borough’s cycleway network.
5.19	Amendment to text	Replace “expected” with “required” to make clear that there is no other option than joint comprehensive working.
5.20	Amendment to text	2 <sup>nd</sup> bullet: change “looser fit” to “looser grain” which is more generally understood in planning terms.
5.20	Amendment to text	3 <sup>rd</sup> bullet: Green space on the interior of development should ideally link to surrounding features, to ensure connectivity and avoid ‘land locked’ green spaces.

Unrestricted

Policy/ Para. Number	Suggestion	Comment																								
5.20	Amendment to text	3 <sup>rd</sup> bullet: There is some concern from a biodiversity perspective that specifying the location of public open space may prejudice the ability to protect biodiversity. The results of ecological surveys should be able to influence the layout of the development. If important habitats are located within a different part of the site, they should be given consideration as public open space in order to protect them.																								
5.20	Amendment to text	5 <sup>th</sup> bullet: insert wording "...accessible <b>to all</b> and...".																								
5.21	Clarification	<p>Suggest that Policy 2 dwelling mix percentages could be shown and compared with the Housing Strategy figures:</p> <table border="1"> <thead> <tr> <th></th> <th>1 bed flat</th> <th>2 bed flat (4 person)</th> <th>2 bed house</th> <th>3 bed house (5 person)</th> <th>4 bed house (6 person)</th> </tr> </thead> <tbody> <tr> <td>Affordable - Western SHMA (inc. Bracknell Forest)</td> <td>30-35%</td> <td colspan="2">30-35%</td> <td>25-30%</td> <td>5-10%</td> </tr> <tr> <td>Affordable - Bracknell Housing Strategy</td> <td>30%</td> <td>20%</td> <td>25%</td> <td>20%</td> <td>5%</td> </tr> <tr> <td>Market – Western SHMA (inc. Bracknell Forest)</td> <td>5-10%</td> <td colspan="2">25-30%</td> <td>40-45%</td> <td>20-25%</td> </tr> </tbody> </table>		1 bed flat	2 bed flat (4 person)	2 bed house	3 bed house (5 person)	4 bed house (6 person)	Affordable - Western SHMA (inc. Bracknell Forest)	30-35%	30-35%		25-30%	5-10%	Affordable - Bracknell Housing Strategy	30%	20%	25%	20%	5%	Market – Western SHMA (inc. Bracknell Forest)	5-10%	25-30%		40-45%	20-25%
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5.22	Add text	Reference to intermediate and affordable rented homes in Policy 2 should be supplemented with reference to BFC's normal affordable housing tenure split of 70% AR and 30% IH.																								
Policy 3	Consistency	Policy is quite prescriptive in terms of appropriate design and materials. Check consistency with NPPF that allows for innovation. Suggest policies should be a higher level and should then cross reference to character studies to pick up all the issues raised in the studies and the Character Area Assessments SPD.																								
Policy 3	Amendment	1 <sup>st</sup> paragraph: general design requirements set out are covered by BFBLP policy EN20.																								

Unrestricted

Policy/ Para. Number	Suggestion	Comment
	to text	
Policy 3	Amendment to text	1 <sup>st</sup> paragraph: replace “, provided” with “where”.
Policy 3	Additional tree/green frontage policy	<p>Point (i) 5th bullet (ii) 5th bullet: This is strongly supported as this will help to protect biodiversity and allow movement of wildlife through areas of development.</p> <p>However, rather than highlighting the requirement for trees to accompany new development in specific areas, given the importance of vegetated frontages and large native deciduous trees to the character of Warfield parish, it is advised that a specific tree and green frontages policy is developed. This would require native species-rich hedging and large native deciduous trees from new development to enhance the character of the parish area and benefit biodiversity.</p> <p>This also reflects the level of interest in the environment held by residents &amp; community in respect of trees (ref. para. 4.9, page 26).</p> <p>A policy would better identify and qualify the importance of trees for the Warfield community (both in the context of a strategic landscape through to individuals of merit, such as heritage and veteran trees).</p>
Policy 3	Amendment to text	Point (i) 5 <sup>th</sup> bullet: replace “will be discouraged” with “is not appropriate” to strengthen the policy.
Policy 3	Clarification	Point (i) 6 <sup>th</sup> bullet and (ii) 6th bullet: the requirement for “One field width separation should be maintained between the settlement boundary and open countryside” is queried. Firstly as field widths vary this is not a recognised measurement. Secondly the purpose of having a field width gap between the settlement boundary and the open countryside is not clear as the field would be part of the open countryside.
Policy 3	Amendment to text	Point (ii) 4 <sup>th</sup> bullet: Suggest changing the text to “ <b>Predominant building materials should be red brick with the occasional use of render</b> , but”. And change ‘building line’ to ‘ <b>building lines</b> ’
Policy 3	Amendment to text	3 <sup>rd</sup> paragraph: Infill by its nature is likely to affect adjoining residential properties to some degree. It is suggested that the policy should refer to <b>unacceptable</b> harm.
Policy 3	Amendment to text	Last 2 paragraphs could be deleted as they do not relate to design and appear to deal with issues covered elsewhere.
Policy 3	Observation	Is the intention that applications meet all the bullet points listed? As it is currently written, applications may only need to meet one criterion.
Policy 4	Observation	<ul style="list-style-type: none"> <li>• Newell Green to Warfield Street Local Gap includes the whole of SHELAA site WAR8</li> <li>• Warfield Street and SA9 Area 3 to Hayley Green Local Gap includes the whole of SHELAA sites WAR11 &amp; WAR12</li> </ul>

Unrestricted



Policy/ Para. Number	Suggestion	Comment
		<ul style="list-style-type: none"> <li>Hayley Green to the parish boundary with Winkfield Row/Chavey Down Local Gap includes the whole of SHELAA sites WAR18 &amp; WAR19.</li> </ul> <p>If these sites are taken forward to preferred option there may be a conflict with the emerging Comprehensive Local Plan.</p>
Policy 4	Amendment to text	To enable referencing it would be helpful to have the Local Gaps numbered in the policy and on the Policies Map. In addition there are 3 gaps listed in the policy but only 2 on the Policies Map.
Policy 4	Amendment to text	2 <sup>nd</sup> paragraph: suggest reword to “Development proposals within the Local Gaps should not lead to...” as the use of the words “will be supported” could give the opposite impression to that which may be intended by the policy, namely that development should generally be resisted in the gaps.
Policy 4	Amendment to text/map	Local gaps provide an important opportunity for enhancing green infrastructure, perhaps the neighbourhood plan could be more explicit about actively using local gaps as green infrastructure in this or other policies.
5.29	Amendment to text	Policy C8 of the Berkshire Structure Plan has been revoked and should not be referred to. Include document reference: “... <b>BFBLP ‘saved’</b> Policy EN10...”.
Plan F	Amendment	Suggest the inclusion of a key.
Policy 5	Clarification	Unclear as to the justification and consequent need for this policy. It is not clear whether a local housing needs assessment has been undertaken to show there is a proven unmet local need for affordable housing. If sites have not been allocated sites for this purpose, the plan should include clear criteria in the policy. There has never been a rural exception affordable housing policy in a local plan for Bracknell Forest, as no countryside or Green Belt area is considered remote enough from the built-up areas of Bracknell, Binfield, Crowthorne and Sandhurst to justify one. The reference to “demonstrable need” will need to be underpinned by the preparation of a local housing needs study – the Rural Housing Enabling Officer for the Community Council for Berkshire could assist with this (further details can be provided on request). There is a similar policy in the Hurley and The Walthams Neighbourhood Plan (Submission Plan) which was largely supported by the Examiner in his report of January 2017. Text should clarify that this policy does not override green belt policy and its status in respect of other constraints such as local gaps, protected trees or areas of high flood risk.
Policy 5	Clarification	a): it should be made clear whether “...existing settlement boundary...” and “... clearly identified settlement...” refer to the defined settlements identified in the SALP (2013) or Green Belt Villages identified in BFBLP Policy GB3. Please note that Policy GB3 is not considered to be fully consistent with the NPPF. This needs to be clarified in the supporting text.
Policy 5	Clarification	2 <sup>nd</sup> paragraph: Clarify what is meant by “will include safeguards that the scheme provides for the

Unrestricted

Policy/ Para. Number	Suggestion	Comment
		identified local affordable housing need”. What are the safeguards? On granting any permission, a legal planning agreement would need to be in place to ensure that the homes will always remain affordable, will be for people in housing need and prioritised for those with a strong local connection to the parish.
5.39	Clarification	The 1 <sup>st</sup> sentence states that: “This criteria based policy allows for small scale schemes of affordable housing as an exception to policy adjoining settlement boundaries and within the Green Belt. For the purpose of the policy small scale is defined as 10 dwellings or fewer.” However, the policy wording does not make reference to ‘small scale schemes’. In addition the policy wording makes reference to supporting exception sites “...located in...a clearly defined settlement;” not just adjoining settlement boundaries as stated in the paragraph. This needs to be clarified in the policy. Clarity should also be provided on whether the 10 dwellings is a gross or net figure.
5.39	Amendment to text	This policy should not apply within the Green Belt – this para suggests that it would be an exception to Green Belt policy which would be contrary to NPPF if it allowed inappropriate development to take place within the green belt.
5.40	Clarification	1 <sup>st</sup> sentence: states that “The policy sets this limit to ensure that the scale of the developments will be modest (the site does not exceed 0.4ha)...” However, this site size limit is not included in the policy wording.
5.41	Clarification	The 2 <sup>nd</sup> sentence states that Policy 5 “...requires planning applications to demonstrate through a viability appraisal the minimum number of open market homes required to deliver a viable scheme.” However, this is not mentioned in the policy wording. If it is the intention to require a viability appraisal it needs to be included in Policy 5. There is a risk that a relatively high percentage of market houses could be built on otherwise inappropriate development sites.
5.42	Clarification	The paragraph states that if an appraisal is not submitted or is not satisfactory then the planning application will not be approved. However, the policy does not require a viability appraisal as mentioned in 5.41.
Policy 6	Comment	Policy is supported as a valuable part of ensuring new development incorporates green infrastructure for the benefit of people and wildlife in the future.
Policy 6	Amendment to text	Suggest first 2 paras are put into explanatory text as these appear to be descriptive and do not contain any actual policies.
Policy 6	Policies map	The policies map is really too small a scale to easily identify the GI network and appears to contain

Unrestricted

Policy/ Para. Number	Suggestion	Comment
	– green infrastructure	some omissions such as Cabbage Hill/other SANG or overlap with other designations such as The Cut Corridor, the Bull Brook River Park or proposed local green spaces.
Policy 6	Amendment to text	3 <sup>rd</sup> paragraph: wording “on land that lies within proximity to the Network...” is imprecise and could cause problems in interpretation of what within proximity means. Suggest “adjoins” may be clearer.
Policy 6	Definitions	Include definition or reference for ‘assets of biodiversity value’.
Policy 6	Amendment to text	The policy does refer to The Cut and Bull Brook watercourses but does not mention that green infrastructure also includes the wider network of ‘blue’ features relating to water movement such as ditches, ponds and areas prone to surface water flooding. This also links to the importance of good development design in terms of including Flood Risk Assessment and appropriately designed SuDS). To demonstrate this point, below is an excerpt of the blue infrastructure identified in Warfield by the Thames Valley Environmental Records Centre (TVERC):

Policy/ Para. Number	Suggestion	Comment
		<p data-bbox="589 320 696 355">Warfield Parish GI Type: Blue</p>  <p data-bbox="996 300 1079 360">                       TVERC                 </p> <p data-bbox="589 1010 1030 1043"> <small>Map produced by Thames Valley Environmental Records Centre in 2016 © Crown Copyright. All rights reserved                      Oxfordshire County Council Licence No 100823343 (2016)                      FOR REFERENCE PURPOSES ONLY. NO FURTHER COPIES MAY BE MADE.</small> </p> <p data-bbox="575 1058 1845 1121">Amend policy so that the definition of green infrastructure includes blue infrastructure. An example drafted for the CLP GI policy can be made available.</p>
Policy 6	Amendment to text	<p data-bbox="575 1125 1928 1326">4<sup>th</sup> paragraph: suggest the wording is changed to: <b>“Proposals that lead to the loss of land or features that form part of the network, that reduce its environmental quality or that will prejudice the completion of a comprehensive network will be required to demonstrate that such loss is unavoidable.”</b> This is because it is relatively easy to argue necessity depending on the interests of the applicant. However, it is a more effective test to ask applicants to demonstrate that it is unavoidable or that there is no reasonable alternative in the interests of the Warfield community.</p>
Policy 6	Clarification	<p data-bbox="575 1329 1895 1390">It is unclear, due to the various shades of green on the Policies map, which are covered by this policy. There are what would appear to be large green infrastructure network areas on several SA9</p>



Unrestricted

Policy/ Para. Number	Suggestion	Comment
		development parcels, including Fairclough Farm development site that has recently been approved at BFC planning committee. The rationale behind this is unclear and this is contrary to established SALP strategic policy and therefore should be deleted. The Warfield SPD already highlights the need to safeguard ecologically sensitive parts of the SA9 area and respond to opportunities to enhance the borough's GI network. This will be achieved through more detailed design work.
5.44	Amendment to text	Amend to "...saved <b>BFBLP</b> Policy R8...".
5.45	Amendment to text	Given that river corridors are such important features in the landscape for biodiversity this is a good opportunity to expand the wording beyond creating access which in isolation does not support biodiversity to creating multi-functional river corridors for people and wildlife.
5.46	Amendment to text	Support the requirement for developments to avoid deterioration in the quality of the rivers. Suggest adding text to require developments within or adjacent to these watercourses to undertake some level of water monitoring to demonstrate there is no deterioration of water quality.
5.48	Amendment to text	Points out that some GI features are not physically connected to the network. Suggest amending text to recognise that GI features can make an important contribution as stepping stones, first recognised by the Lawton Review in 2010.
Policy 7	Observation	Local Green Space 4 includes part of the SHELAA sites WAR13 and WAR16.
Policy 7	Observation	Warfield Parish Council should ensure that the Land owners have been consulted on the proposed Local Green Space designation. For example, Local Green Space 3 is owned by Harrow Estates.
Policy 7	Amendment to text	The wording of Policy 7 in relation to Local Green Spaces is not considered to be consistent with the NPPF and therefore is not considered to meet the Basic Conditions as currently worded, but the Policy could be modified to be consistent with the NPPF. It is considered that the Policy requires wording specific to Local Green Spaces which should be consistent with Green Belt policy (NPPF para. 78). Modification of the Policy can result in it meeting the Basic Conditions and being robust for decision making, and it is suggested this would include references to 'new development being inappropriate', 'openness' and 'very special circumstances'.
Policy 7	Clarification	Local Green Space 3 does not appear to meet the requirements of NPPF para. 77 (bullet 1) in that it does not appear to be in reasonably close proximity to the community it serves. It is therefore considered that the site does not meet the basic conditions.
Policy 7	Amendment to policies map	The policy refers to 5 Local Green Spaces using roman numerals however they are referred to by numbers on the Warfield Neighbourhood Plan Policies Map. This needs to be consistent. Detailed individual maps clearly showing the red line boundary of the Local Green Spaces are also required.

Unrestricted

Policy/ Para. Number	Suggestion	Comment
Policy 7	Clarification	The policy doesn't include a number of BFC greenspaces including Westmorland Park, Goddard Way, Harvest Hill, etc. It's not clear if this policy only refers to new open spaces or those close to SHELAA sites. A clarifying statement would be helpful.
Policy 7	Clarification	Local Green Space Designations: There doesn't seem to be consistency in the choice of sites for designation. It includes a site that doesn't yet exist as an open space, a SANG not yet created (Wellers Lane), but others such as Cabbage Hill have not been included. It is debatable whether SANG should be included as they already have 'in perpetuity' protection. Hayley Green Wood is included, but Westmorland Park isn't, even though these are managed as one site. Other green spaces are included in Policy 8 as community assets, but could also be designated as green spaces to increase protection, e.g. Goddard Way and Priory Fields.
Policy 7	Clarification	In order to effectively determine applications against this policy it would be helpful to identify what elements the Parish consider should be protected. Is it simply its openness or are there other elements that constitute its character?
5.50	Amendment to text	Replace 'exceptional circumstances' with 'very special circumstances'.
5.51	Amendment to text	Appendix A Schedule of Evidence does not appear to include a document setting out the review process and how the Local Green Spaces meet the criteria of paragraph 77 of the NPPF. This evidence needs to be provided in order to justify the 5 Local Green Spaces listed in the policy.
Policy 8	Clarification	Is there a reason why all the pubs aren't listed here, for example, the Yorkshire Rose, The Leathern Bottle?
Policy 8	Clarification	These assets should be identified on the policies map. Is it the intention that these assets will be formally identified as "Assets of Community Value"?
5.52	Amendment to text	Reference to Policy CS8 should include the document i.e. the Core Strategy (2008).
5.53	Clarification	The paragraph states that: "The neighbourhood plan group have collected evidence on community facilities..." However, Appendix A Schedule of Evidence does not appear to include a document setting out the evidence.
Policy 9	Clarification	Does not differentiate between previously developed and greenfield sites. The policy should be reviewed in terms of its consistency with the NPPF and the development plan.
Policy 9	Amendment to text	3 <sup>rd</sup> bullet point: suggest inserting 'the' between 'harming' and 'open'
Policy 9	Amendment	1 <sup>st</sup> bullet: appears to restrict the re-use of existing buildings to agriculture or small scale social enterprise

Unrestricted

Policy/ Para. Number	Suggestion	Comment
	to text	(undefined) which is more onerous than current countryside and green belt policy. Considered therefore not to be in accordance with the NPPF.
Policy 9	Amendment to text	2 <sup>nd</sup> paragraph: it is not clear whether the reference to “proposals for housing development” is intended to refer to just new build or the change of use/conversion of existing buildings. Assuming it only relates to new build the use of the term exceptional circumstances (i.e. very special circumstances?) should be restricted to development in the green belt.
Policy 9	Clarification	The 2 <sup>nd</sup> paragraph 1 <sup>st</sup> sentence states that: “Proposals for housing development in the countryside to serve the essential uses of agriculture or some other special need will only be granted in exceptional circumstances and be in accordance with all other planning policies applicable to that location, including but not limited to policies applying within the Green Belt.” Paragraph 55 of the NPPF supports houses for essential rural workers, indeed “essential need for rural worker to live permanently at or near their place of work in the countryside” is listed as a special circumstance and does not require there to be “exceptional circumstances” However in the Green Belt, this is not an exception listed under NPPF para. 89. In addition it is not clear what is meant by “other special needs”. It is therefore considered that this paragraph needs rewording to ensure it is consistent with the NPPF. As currently worded it is not considered to meet the basic conditions.
Policy 9	Clarification	2 <sup>nd</sup> paragraph 2 <sup>nd</sup> sentence: refers to “occupation of the dwelling is tied by condition to the established business use...”, however, the paragraph is concerned with agricultural rather than business use. This needs to be clarified.
Policy 10	Amendment to text	There is already a duty on LPAs to preserve and enhance conservation areas, heritage assets and biodiversity. This policy may therefore not be necessary, as matters are already sufficiently covered in the NPPF and other development plan policies.
Policy 10	Clarification	The policy refers to “designated environmental, landscape and heritage assets” which may need to be defined in the plan as this might not necessarily cover nature conservation despite mention of a SSSI in the policy.
5.59	Amendment to text	Reference to Policies EN8 and EN9 should include the document, i.e. the Bracknell Forest Borough Local Plan (2002). Policy EN9 should be referred to in full.
5.61	Amendment to text	Refers to the use of biodiversity accounting (offsetting) and the mitigation hierarchy which is welcomed. However, there are three points which need to be amended: i) Reference to the DEFRA “habitat impact assessment metric” is incorrect. Recommend correcting to DEFRA biodiversity offsetting metric. However, it should be strongly emphasised in this plan that offsetting is the last step in the mitigation hierarchy. There is now a TVERC biodiversity impact

Unrestricted

Policy/ Para. Number	Suggestion	Comment
		<p>assessment calculator that is tailored to the local conditions in Berkshire that Bracknell Forest Council will be referencing in the Comprehensive Local Plan. Therefore, we recommend reference to this in the neighbourhood plan.</p> <p>ii) While the NERC Act 2006 does impose a duty on all public authorities in relation to the conservation of biodiversity, it does not refer to mitigation hierarchy. Recommend using a separate paragraph to cover this point.</p> <p>iii) Reference to the mitigation hierarchy “where required adhere to the mitigation hierarchy in accordance with Section 40 of the Natural Environment and Rural Communities Act 2006 and Paragraphs 109 and 118 of the National Planning Policy Framework.” While the NPPF describes the mitigation hierarchy in terms of significant adverse effects, this sequential approach to minimising impacts on biodiversity is a well established concept in ecological impact assessment for any proposals. Recommend amending this policy to require all proposals to demonstrate use of the mitigation hierarchy in accordance with the NPPF, ecological impact assessment guidelines and BS42020.</p>
Policy 11	Clarification	<p>Policy appears contradictory, requiring no lighting whilst requiring lighting to conform to specific guidelines. Agree that external lighting of all sorts should be minimised, however the policy needs to be clearer on what is intended.</p>
Policy 11	Clarification	<p>It is unclear whether this policy is intended to apply throughout the parish or just in rural areas (given the reference to guidance for rural areas). If the latter, the areas it applies to need to be shown on the policies map. It should be made clear how appendix G is intended to be used – and whether it relates to this policy.</p> <p>If it is intended to apply in urban areas, consideration needs to be given to the implications on highway and public safety (e.g. people walking along poorly lit roads), or security of people and properties. This could be a difficult policy to use in the determination of planning applications as currently worded given the above ambiguities and potential conflicts with other planning objectives.</p>
5.62	Amendment to text	<p>Reference to Policy EN15 should include the document i.e. the Bracknell Forest Local Plan (2002).</p>
Policy 12	Amendment to text	<p>It should be clarified whether this policy refers to all drainage, or just sewerage. Reference and consideration should be given to surface water drainage (the existing ditch network) and SuDS. This would support SEA Objectives 4 (in particular 4C), and 5 flood risk (in particular 5B). The plan should consider the blue infrastructure alongside green infrastructure. The blue infrastructure throughout the parish can be readily identified by using the updated surface water flood risk maps.</p> <p>BFC have commissioned a Water Cycle Study and Strategic Flood Risk Assessment. Both should,</p>

Unrestricted

Policy/ Para. Number	Suggestion	Comment
		when published, inform the WNP.
Policy 12	Comment	Whilst the document identifies that surface water flood risk is a concern in the area, and rightly the knock on impact on foul infrastructure, the plan could go further by identifying blue routes to be protected and the type of SuDS that they would want delivered in the area.
Policy 12	Amendment to text	Consider reference to Sustainable Drainage Systems (SuDS) either in this or other policies. SuDS provide a variety of benefits in the design of public open space, supporting biodiversity and preventing flooding.
5.70	Clarification	The 2 <sup>nd</sup> sentence states that the policy will lapse once the BFC Comprehensive Local Plan is adopted. It is unclear why the policy needs to be 'lapsed' or the mechanism for lapsing the policy. Once the Neighbourhood Plan is part of the Development Plan, policies do not 'lapse'. Also, in policy terms, if there is a conflict between two policies, the most up-to-date Plan policy would take precedence. Further explanation is needed.
Policy 13	Amendment to text	Unclear as to why this policy is restricted to off-road parking? What is the evidence or justification for this? Parking solutions inform character. On plot parking may not always be possible and can lead to lower housing densities and higher land take as a result. There could be a need for bays on street within developments, and can work well, e.g. at Abbey Place. Publicly accessible on-street parking can be one of the most efficient forms of parking provision. More appropriate wording could be to state that "parking provision should not overly dominate the streetscene and should replicate parking solutions in the immediate vicinity to maintain the character of the area."
Policy 13	Amendment to text	Final paragraph: the Parking Standards SPD includes provision for flexibility in the number of parking spaces that need to be provided where this is supported by robust evidence. This flexibility should be incorporated within Policy 13.
Policy 13	Amendment to text	Unclear what is meant by "parking, garaging and ancillary buildings should be well integrated into the plot"? Suggest amended text: "Buildings should not dominate visually and should be subservient to the main dwelling or other principal building".
6.5	Comment	Refers to a number of measures, some of which may not be desirable to BFC and some which may not be deliverable: <ul style="list-style-type: none"> <li>• 1<sup>st</sup> bullet: This is the A3095 which is a principal route and carries a significant amount of traffic to and from the borough. Build outs are designed for neighbourhood roads and require priority working which would have a detrimental impact on strategic movement in the borough.</li> </ul>

Unrestricted

Policy/ Para. Number	Suggestion	Comment
		<ul style="list-style-type: none"> <li>• 2<sup>nd</sup> bullet: Speed reduction measures are only considered on an evidence based approach and if on a bus route will need to consider design carefully.</li> <li>• 4<sup>th</sup> bullet: Each pedestrian crossing site will need to be assessed to ensure it meets the requirements for such a crossing.</li> <li>• 5<sup>th</sup> bullet: provision of cycle lanes throughout the plan area is agreed, however at present there are considerable challenges to implementing cycleways in much of this area due to availability of land, lack of existing footways, presence of mature trees and lack of lighting.</li> <li>• 7<sup>th</sup> bullet: bus routes in Warfield are all council-supported and budget pressures do not permit us to increase frequency without an additional, external funding source.</li> </ul>
6.6	Comment	One way of improving GI is to participate in action towards the Bracknell Forest Biodiversity Action Plan (BAP). Warfield Parish Council is a representative on the Bracknell Forest Nature Partnership which seeks to protect and enhance biodiversity in the borough in line with the BAP. The neighbourhood plan could provide additional emphasis on the parish council as playing an active role in enhancing biodiversity within existing GI using targets in the BAP. Consultation on the BAP is underway via the nature partnership and will invite Warfield Parish Council to support specific targets. The new Biodiversity Action Plan will be published next year.
Policies Map	Amendment to policies map	The areas outside the Warfield Neighbourhood Plan area should be greyed out to indicate they are outside the plan area. The current policies map has areas outside the plan area coloured green so it appears that Policy WNP6 also applies to them. In addition it is not clear where Policy WNP1 applies.
Policies Map	Amendment to policies map	Inset maps of the 5 Local Green Spaces should be included at smaller scale to enable the exact boundaries to be easily identified.
Policies Map	Amendment to policies map	Inset map of the Hayley Green allocation should be included at a smaller scale to enable the exact boundaries to be easily identified.
Policies Map	Amendment to policies map	A section of Big Wood LWS is missing from the WNP 6 – Green Infrastructure Network layer. This appears to be because the boundary of the TPO has been used to define the area rather than the Local Wildlife Site boundary.
Appendix 2 – WNP2 Hayley Green	This concept plan needs reviewing and is not	<p>This is a concept plan. Reference to a “concept masterplan” is misleading as a detailed masterplan needs to be produced prior to any planning application coming forward for this site.</p> <p>If Bracknell Road is the rural edge, as defined on Plan F, I would argue that this should be detailed as a</p>

Unrestricted

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Concept Masterplan	acceptable in planning terms as proposed.	<p>sensitive edge on the concept plan and that development should be set back here and Bracknell Road be kept as a green edge to the village. The concept plan shows development parcels on this edge. This will urbanise Bracknell Road and completely change its character. Consideration should be given to the edge being more transitional between the edge of the village and the rural edge of Warfield. Trees and existing vegetation should be kept on Bracknell Road.</p> <p>It should be made clear that the masterplan may need to vary from the concept plan as more detailed survey and analysis work is carried out.</p> <p>Why are accesses into the site being shown from the north? Development should be facing south towards the town centre, this is a BFC Core Strategy objective. Surely vehicular access into the site should be from the south, where development is already seen. Providing the main vehicular accesses onto Bracknell Road will urbanise this area.</p> <p>Connectivity is needed to the south where the footpath cycleway is being proposed and to integrate new development into the existing community of the village. In legibility terms too it makes more sense to create the access into the new allocated site from the south. If a footway/cycleway is being proposed along Forest Road, there will be an urbanising impact. It may therefore be preferable in planning terms to bring the vehicular access in from the south and leave the northern edge as the rural edge and abutting open space.</p> <p>The open space area should have development fronting onto it – see the Design SPD. As proposed, existing back gardens abut the open space. This is not good planning. The open space area needs to be located more to the east linking in with existing community facilities, such as the pub.</p>
Inset Map	Amendment to map	The Inset Map – WNP2 Hayley Green Concept Masterplan identifies an area of “designated open green space”. However, the Policies appear appears to identify this as Local Green Space (4). There needs to be consistency.
Appendix A	Amendment to text	Warfield Masterplan SPD (2010) appears incorrect. Should be “Warfield SPD (2012)”.
Appendix D	Amendment to Appendix	The title is Local Green Spaces, however, the map illustrates green spaces not just Local Green Spaces as identified in Policy 7. In addition the title should include the wording ‘Appendix D.’

Unrestricted

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		The appendix is not referenced in the document so the purpose of its inclusion is not clear.  The supported text lists a number of natural environment assets which are acknowledged as particularly valuable however they are not specifically identified on the map. Suggest that the open space/SANG delivered on the Berkeley Homes development north of Harvest Ride is included.
Appendix E and F	Clarification	The appendices are not referenced in the document so the purpose of their inclusion is not clear.
Appendix E	Update map	The bus route map shown is out of date. An updated map can be made available.
Appendix	Clarification	It would be helpful to have a glossary of terms to define the terms used in the plan.
<b>Comments on the SA/SEA</b>		
P8, last para	Text amendment	'access' should read 'assess'.
P14 para 3.15	Text amendment	Habitat connectivity and blue infrastructure are essential components of GI and should be referenced for clarity.
P18 para 5.13	Text amendment	Surface water flooding also relates to land management and design, not simply surface water drainage. Amend text to reference this.
P19 Obj 2	Text amendment	Remove 'designated' as it conflicts with the objective and the example of 'locally non-designated assets'.
P20 Obj 4A	Text amendment	'adjacent to' needs further consideration in light of the potential for air quality issues relating to the SPA/SAC (refer to Policy 2- Air Quality comments above).
P20 Obj 4C	Text amendment	Suggest delete 'in line'.
P20 Obj 5	Text amendment	Flood risk should be widened to include all sources of flooding, e.g. groundwater.
P21 Table C	Clarification	NP Objectives 2 and 3 are very similar yet have been assessed differently within Table C. It is not clear why.
P21 Table C	Comment	In the same way as the NP sustainable parish growth objective has been assessed as having uncertain effects on several of the SA/SEA objectives; this may also be the case for the community facilities and traffic NP objectives.
Policy	Comment	Policy references within the SEA (e.g. 'WAR1') do not reflect the naming used within the NP document



Unrestricted

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references		(e.g. 'Policy 1'). The 'WAR1' type of reference is easily confused with the SHELAA site references used by BFC.
P 25 Policy 2	Comment	Flood risk is potentially a negative effect due to the presence of surface water flood risk and relative proximity to fluvial flood risk to the west (it is shown as neutral effect in Table D).
P26 Policy 4 local gaps	Comment	By designating local gaps, there is potential for a natural tension with, and negative effect from, housing delivery and to increase development pressure in other areas of the parish and borough. This is not reflected in Table D or the associated discussion on page 26, para 8.5.
P26, Policy 6 GI	Comment	A GI policy should also aid flood risk and transport by providing accessible routes.
P27, Policy 10	Comment	Policy 10 goes beyond the designated assets discussed in para 8.11 to require no net loss to biodiversity and heritage i.e. it is more positive than noted here.
P29 para 9.1	Comment	Final sentence needs to be corrected. The emphasis/purpose of this section is not clear.
P29 para 9.4-9.7	Comment	<p>A plan would help to clarify text. Ideally this should be backed up with a table correlating the sites referred to, with the SHELAA sites.</p> <p>The SHELAA identifies 'reasonable alternative' sites that have not been assessed within the SEA. This includes for example WAR3 (Syngenta), WAR20 (included within the final SHELAA document which has recently been published). As a minimum, discussion and justification is needed as to why they have not been considered.</p> <p>Plan C needs to be clearer. Site boundaries need to be clearer and larger, e.g. it should include site names used within the text.</p>
P31, para 9.9	Comment	<p>The SEA objective is wider than just the designated heritage features referred to here. All the sites are within proximity to listed buildings, there may be harm caused to the setting of some of these - there does not appear to be an assessment to back up this conclusion.</p> <p>It is not clear where the sites are (Plan C) in relation to the assets identified in the Warfield Constraints Plan (Map A), or the Conservation Area (Map B).</p>
Para 31, para 9.10	Comment	There is a need for consistency in evidence base between the emerging Comprehensive Local Plan and WNP, for instance in terms of landscape and ecology assessments.

Unrestricted

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		Conservation – the text infers a similar effect between options A to C, however options B and C are given a lower score within the table on page 30.
P33, section 10	Comment	The report should clearly identify how the assessment has influenced the development of the plan; the significant effects of the plan and how they will be prevented, reduced or offset.
Table B	Comment	Table B is referred to but is missing from the report as such it is not clear how the significant effects of the plan will be monitored and any adverse effects responded to.