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Bracknell Town Council

By email to: clerk@bracknelltowncouncil.gov.uk

20 August 2018

Dear Jackie

BRACKNELL TOWN NEIGHBOURHOOD PLAN PRE-SUBMISSION CONSULTATION

Thank you for your emails dated 3 and 10 July 2018, 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. Please note, these comments only relate to policies and its supporting text, and not the Actions, since only the land-use policies will form part of the Development Plan and be used in decision making when the Plan is made.

Technical comments are as follows:

- The link between the BTNP objectives and the policies needs to be more clearly established.
- 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 Neighbourhood Plan needs a 'Policies map' to show the boundaries of policies set out in the Plan which have spatial implications i.e. areas where specific policies apply, e.g. the Local Green Spaces.
- The supporting text needs to focus more on providing supplementary information to the policies, and the link between the policies and the evidence base needs to be made clearer.
- The Neighbourhood Plan should have a section that covers implementation and monitoring.
- There is the opportunity to develop some of the policies further e.g. Policies EV8 Allotments, EV10 Watercourses and River Corridors, EV11 Air Quality, HO7 Private Gardens: Green Space Biodiversity Corridors among others.
- There are elements in some policies which are not considered to be policy, and should be moved to the explanatory text e.g. requirements for

the applicant to provide a legacy for local residents, Home Fire Sprinkler Systems.

- There are elements in some policies which are not considered to be consistent with the Community Infrastructure Levy (CIL) Regulations.
- The wording in Policy EV3 is not considered to be consistent with the NPPF and therefore does not meet the basic conditions. The Policy requires wording specific to Local Green Spaces which should be consistent with Green Belt policy (NPPF para. 101). In addition, an overview map showing the proposed Local Green Spaces would be beneficial, and the detailed individual maps in the Appendices would benefit from having a clear red line boundary around the designations.
- The Heritage policies require some redrafting to ensure they are consistent with Chapter 16 of the NPPF, in order to meet the basic conditions.
- The Neighbourhood Plan needs to be clear how Chapter 8 'The Character of Bracknell Town Neighbourhoods' links to the policies and how it would be used in decision making (if this is in the intention). It is also recommended that this section is put in the 'Housing and Character Section'.
- There are instances where the underlying objectives of policies overlap; it is suggested that such policies would benefit from being merged and consolidated.

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 stylized flourish at the end.

Andrew Hunter
(Chief Officer: Planning, Transport & Countryside)

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Policy/ Section Page No.	Suggestion	Comment
Comments on the pre-submission draft Bracknell Town Neighbourhood Plan		
General comment - whole document		Consistent page (and illustration) numbering is needed from the start of the document to the end; page numbers by section is not useable, particularly since when viewed electronically as a PDF page numbers run differently from 1 to 283 (not including the separate appendices). Consistent page numbering will aid legibility of the document. Notably Chapter 8 and the Appendices do not have page numbers at all; they require page numbers also.
General comment - whole document		The document requires paragraph numbering throughout to ensure relevant sections of the supporting text can be referred to precisely and consistently. This will aid legibility of the document.
General comment – whole document		There are formatting variances throughout the document; some sections are in columns, some span the whole width of the page. In some instances it is unclear where the next paragraph is because there is a diagram in the middle of the page. This would be resolved by paragraph numbering as above. There are also a mix of fonts, font colours and font sizes used. Again, these should be consistent throughout the document to make it clear when text is being deliberately highlighted.
General comment – whole document		Many of the photos do not clearly relate to the section they are located within, or opportunities to link what issues/ specific things they show are missed. Some photos are not referenced at all.
General comment – whole document		Several of the weblinks provided do not work, either because the link is wrong or the content they linked to has been deleted/ moved. These should be checked.
General comment – whole document		The Plan refers to BFBC throughout; the Council is now Bracknell Forest Council (BFC) and should be referred to as such. It is only relevant to state BFBC when using the title of a document from that era. Also, Bracknell Forest is not a 'district' but a 'borough'.
General comment – whole document		There is extensive background, viewpoints, quotes, history etc. in many sections of the Plan. This prevents the user being able to readily find the key information informing and justifying the policy. The historical information would be better placed into a supporting evidence document, since the Neighbourhood Plan will be a planning document used in decision making. The supporting text should link to the policies, providing additional detailed information.
General comment – evidence		Some of the evidence relied upon is quite dated or no longer the most up-to-date information available. In several places the Plan references studies/ evidence that it is not 'local', but produced by other Local Authorities, e.g. Hillingdon's SuDS evidence, West Berkshire Core Strategy. All evidence should either be locally collected or commissioned by the Town Council (i.e. specifically relates to Bracknell Town), or utilise Bracknell Forest Council studies. The evidence base supporting the emerging Bracknell Forest Local Plan can be found here: https://www.bracknell-forest.gov.uk/planning-and-building-control/planning/planning-policy/draft-bracknell-forest-local-plan/evidence-base

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General comment – maps/plans		The Plan should be accompanied by a policies map which shows the spatial extent of relevant policies, e.g. EV4 and EV8 which cross-refer to the policies map, among others. Many policies will only make sense in the context of a map. This was not available for the consultation so the Council has been unable to provide comments.
General comment – maps/plans		Maps showing a proposed designations or specific area to which is applies, should have a clear unambiguous boundary around the proposed area, e.g. Local Green Spaces should have a red line boundary around them.
General comment – monitoring		The Neighbourhood Plan should have a section that covers implementation and monitoring, so the effectiveness of the policies can be monitored and understood.
General comment – footnotes		It would help the flow of the document if the sources of information were put in footnotes rather than being written out in full in the text, and the full reference (i.e. the Title of the book and publication information etc.) just provided in the reference list (Appendix 11). Those looking for the sources of such background information would then also know clearly where to look.
General comment – officer names		Please can all name references of BFC Officers be removed from the Neighbourhood Plan, appendices and supporting documentation. Staff members change, and any advice provided was from the Council rather than individuals.
General comment – NPPF		A new version of the NPPF was issued on 24 July 2018 during the consultation period of this Plan. When the Council has provided references to the NPPF, it has done so for this new version. The Neighbourhood Plan will need to update all its references accordingly, including page and paragraph numbers which may have changed.
Contents Pg. 2, 3 and 4	Observation	<ul style="list-style-type: none"> • The contents should include page numbers for each policy to aid legibility. See comment above. • Under 'Heritage' the word "Parks" appears as a heading but this is not a policy or a sub-section of this Chapter. • Under 'Housing and Character' the 'Actions' are not at the end of the section as in other Chapters. • Under 'Character' there is a section of text starting "The building of Bracknell Town..." through to "... (CIL)" that appear as headings but are not a policy or sub-section. • Under 'Economy and Employment' the words "Bracknell's Place in the South East of England" through to "...and Employment Sites" appear as headings but are not a policy or sub-section. • Under 'Transport and Infrastructure' the word "Transport Infrastructure" appears as a heading

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		<p>but this is not a policy or a key sub-section of this Chapter.</p> <ul style="list-style-type: none"> The Ordnance Survey reference needs updating to 2018 in three places.
Illustration 1; Introduction Pg. 1	Amendment to text	<p>Under 'District Policy' amend 'District' to 'Borough'; the Map heading should also be amended accordingly. Amend sentence about Local Development Plan as follows: "...and holds responsibility for setting local policy (Local Development Plan referred to as including Local Plans) and for..."</p> <p>Under Local Policy, the sentence about making the plan should be amended accordingly: "...and is made (brought into legal force) by the LPA." The last sentence should be amended to say "Planning Applications must be determined in accordance with it the Development Plan, unless material considerations indicate otherwise."</p>
Introduction Pg. 2	Observation	Formatting reference 'Left hand page'
Introduction Pg. 2	Amendment to text	<p>The first sentence says 'Neighbourhood Planning Regulations' twice in a row. Unclear what "2.3" refers to. After "...Regulations 2012.." add " (as amended) ". Amend last sentences as follows: "If more than 50% of those who vote at the local referendum do so in favour of the plan/ order forms part of the Development Plan. It will then the Council 'makes' the plan/ order. It will then form part of the Development Plan and be taken into account when making decision on planning application in the neighbourhood area". This reflects the new regulations.</p>
Introduction Pg. 2	Factual update required	<p>The Local Development Scheme referred to is out of date; the regulations require that this document is reviewed and updated regularly. The latest version is 2018 – 2021. It is recommended to link to the webpage rather than the PDF document to ensure the weblink does not expire whenever the document is updated. Similarly, page references will also change, and so the Neighbourhood Plan should not reference the page number. The Local Development Scheme is available here: https://www.bracknell-forest.gov.uk/planning-and-building-control/planning/planning-policy/about-planning-policy</p>
Illustration 2; Introduction Pg. 3	Observation	Unclear why the title refers to the map as 'Table 1'. It would be helpful if this map was larger; the text is very small at this scale.
Introduction Pg. 3	Amendment to text	<p>This paragraph repeats many of the points made on Page 2. Consider merging the paragraphs. Amend third sentence " ...(the NPPF) and with strategic local policy, in particularly the adopted Bracknell Forest Borough Local Plan (2002), and the Core Strategy Development Plan Document (2008) and the Site Allocations Local Plan (2013)." Remove reference to district and replace with borough.</p>
Illustration 3;	Observation	It is unclear what the map intends to show in relation to the Neighbourhood Plan Area. It does not

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Introduction Pg. 4		link to the supporting text referring to Bracknell Town being the sixth largest parish.
Pg. 5	Observation	The text refers to 'Bracknell Forest Local Development Framework pack, September 2006'. This document is now 12 years old and information contained within it will likely have been superseded; it should not be referred to.
Introduction Pg. 10	Amendment to text	Third bullet - Unclear how the Town Council intends to 'ensure' a strong economy. Fifth bullet - Suggest rewording "is provided to cope with facilitate growth"
Introduction Pg. 10	Observation and suggestions	Some elements are outside the scope of the Neighbourhood Plan and the Town Council to achieve. The Plan only references children; it is recommended the Plan considers providing for all members of the community, e.g. disabled people, older people etc. It is noted that Page 45 in the Community section reference is made to ethnic diversity and age, however there is nothing in relation to disability. References to improving accessibility should be included throughout the Plan, particularly in relation to access to parks, woods, sports areas, open spaces and public routes along river courses/ footways.
Introduction Pg. 12	Amendment to text	<ul style="list-style-type: none"> Objective 1A: unclear what is meant by 'sustain the significance of listed buildings'. Consider using terms preserve and enhance which are more meaningful terms. There are two 'Objective 2' Objective 2 (the second one): Suggest amending to "preserve and enhance character" Unclear how the Neighbourhood Plan intends to achieve Objectives 3 and 4. None of the objectives mention trees, landscape, allotments, watercourses, cemeteries, education, streetscene, yet there are policies linked to these topics. Therefore unclear why the policies are needed if they are not achieving the Plan objectives.
Environment and Community Pg. 1	Amendment to text	<p>Bracknell Forest's open space evidence can be found in the Play Open Space and Sports Study available here: https://www.bracknell-forest.gov.uk/planning-and-building-control/planning/planning-policy/draft-bracknell-forest-local-plan/evidence-base</p> <p>The first sentence of the last paragraph does not read clearly.</p>
Environment and Community Pg. 2	Amendment to text	<ul style="list-style-type: none"> It is recommended the Plan includes a glossary of terms – add definition of public realm and parks there instead. Reference to 'Great Aycliffe Town Council' should be removed. Change the formatting of the quote from the Core Strategy so that is clearly distinctive from

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		main text would highlight to the reader this is from another document.
Environment and Community Pg. 3	Consistency	Under Policy Intent - The current evidence is contained in the Bracknell Forest Play Open Space and Sports Study. Using the standard based on historical New Town development is contrary to both national and local policy which requires the efficient use of land (NPPF (2018) para. 122).
Environment and Community Pg. 6-11	Suggestion	Place information tables in a separate evidence base document.
Policy EV1	Amendment to text	<ul style="list-style-type: none"> The Council is generally supportive of the intentions of the policy, however it is considered it would benefit from being more flexible and focusing on quality improvements where capacity can be increased. The Town Council should consider merging this policy with EV2 since the wording is almost identical for both passive and active open space. Recommend first sentence amended to: "Development proposals are expected to retain all existing Active Open Space of Public Value including provision, of existing parks, play areas and sports pitches in Bracknell Town." Current wording limits active OSPV to three elements, so suggested wording makes the policy application wider. Recommend amending second sentence to: "Where there is <u>a sufficient quantity of</u> existing provision, contributions will be sought towards their improvement <u>if the improvement increases the capacity of the provision to meet the needs of the development.</u>" The current wording is unlawful and contrary to CIL regulations which states: A planning obligation may only constitute a reason for granting planning permission for the development if the obligation is— (a) necessary to make the development acceptable in planning terms; (b) directly related to the development; and (c) fairly and reasonably related in scale and kind to the development. If there is sufficient provision then contributions cannot be sought, hence suggested changes. Recommend amending the third sentence to: "Proposals that would result in the loss of public open space Active Open Space of Public Value will only be supported when alternative and equivalent public open space is provided <u>based upon local needs.</u>" As currently written the policy is very limiting and commits the Town Council to always providing

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		<p>that particular use; supposing a site came forward which provided new rugby pitches which meant that the pitches at Calfridis Way could become football pitches instead. The policy as written limits this option for flexibility of use within the OSPV. As currently written, this element is contrary to the emerging Bracknell Forest Local Plan policy (LP50) which would allow OSPV uses to evolve with need and demand. For example, a redundant sports pitch could become newly planted woodland. Recommend the deletion of “and equivalent” since if the existing provision is a run down poor piece of open space, the equivalent alternative could be an equally run down poor quality piece of open space provided somewhere else.</p> <ul style="list-style-type: none"> • It is assumed that the use of the term “public open space” is deliberate meaning that it is interchangeable between Active OSPV and Passive OSPV so both policies work together. • It is recommended that the criteria elements of the policy (para. 4 and associated bullets) are made more flexible to allow ancillary improvements to open spaces such as cafes or parking where appropriate. As currently worded these criteria conflict with the emerging Bracknell Forest Local Plan policy where the Council could consider alternative provision if it increases capacity and is of a higher quality than the land being replaced. N.B. The Town Council should also ensure consistency with Policy EV3 i.e. if any proposed open spaces will be designated Local Green Spaces. • It is also noted that as currently worded the first sentence which seeks to retain ‘all’ existing conflicts with the third sentence which permits the loss of OSPV.
Policy EV2	Amendment to text	<ul style="list-style-type: none"> • The Council is generally supportive of the intentions of the policy, however it is considered it would benefit from being more flexible and focusing on quality improvements where capacity can be increased. • Recommend amending first sentence to: “Development proposals are expected to retain all existing provision of existing Passive OSPV” This would relate to the policy title. • Recommend amending second sentence to: “Where there is <u>a</u> sufficient quantity of existing provision, contributions will be sought towards their improvement if the improvement increases the capacity of the provision to meet the needs of the development.” The current wording is unlawful and contrary to CIL regulations which states: A planning obligation may only constitute a reason for granting planning permission for the development if the obligation is— (a) necessary to make the development acceptable in planning terms; (b) directly related to the development; and (c) fairly and reasonably related in scale and kind to the development.

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		<p>If there is sufficient provision then contributions cannot be sought, hence suggested changes.</p> <ul style="list-style-type: none"> Recommend amending the third sentence to: "Proposals that would result in the loss of public open space Passive Open Space of Public Value will only be supported when alternative and equivalent public open space is provided." See comments for EV1 above. As with Policy EV1, it is recommended that the criteria elements of the policy (para. 4 and associated bullets) are made more flexible to allow ancillary improvements to open spaces such as cafes or parking where appropriate. As currently worded these criteria conflict with the emerging Bracknell Forest Local Plan policy where the Council could consider alternative provision if it increases capacity and is of a higher quality than the land being replaced. N.B. The Town Council should also ensure consistency with Policy EV3 i.e. if any proposed open spaces will be designated Local Green Spaces. It is also noted that as currently worded the first sentence which seeks to retain 'all' existing conflicts with the third sentence which permits the loss of OSPV.
Environment and Community Pg. 7	Information	For local evidence and information on trees in Bracknell Forest, please see the Council's Tree Strategy: https://democratic.bracknell-forest.gov.uk/documents/s112700/07c%20Bracknell%20Forest%20Tree%20Strategy%20draft.pdf
Environment and Community Pg. 13	Information	It is noted that the text refers to CIL sharing between parishes. This would have to be negotiated and agreed between the Parishes. Bracknell Forest Council would have no involvement in these negotiations.
Policy EV3	Amendment to text and consistency	<ul style="list-style-type: none"> The Council notes that there is evidence to support designation of the proposed Local Green Spaces contained in Appendix 2, which has considered the areas against the tests set out in NPPF para. 100. It should be noted that a Local Green Space policy is restrictive; the NPPF states that "policies for managing development within a Local Green Space should be consistent with those for Green Belts." Local Green Space is listed in footnote 6 of the NPPF as a protected areas or assets of particular importance. This policy will constrain the open spaces A – K, which may make it difficult for the Town Council or landowners to develop these areas in the future. For example proposals such as a café, extensions to buildings, car parking etc. may be affected. It is therefore recommended that the Town Council considers whether there are already

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		<p>adequate protections in place for these areas, or if they are at risk.</p> <ul style="list-style-type: none"> • It is recommended the first sentence is amended: “The following areas <u>as shown on the policies map</u> are designated as...” • Whilst it is correct that the restrictive nature of this policy is akin to that of Green Belt, the policy wording itself does not need to refer to Green Belt. It is considered that the second part of the policy referring to demonstrating that it is required to enhance the role and function of that Local Green Space, is not consistent with national policy (para. 101 of the NPPF 2018) and thus would not meet the basic conditions as currently worded. • Development proposals are inappropriate in these areas which should be kept permanently open except in very special circumstances (VSC). It is not appropriate to specify what the VSC may be, such as enhancing the role and function, since VSC by definition cannot be defined. • Indeed it is considered that the proposed designation of A: South Hill Park conflicts with the ambitions of Policy EV12 in this regard, since one seeks protection of the area, whereas the other strongly supports development proposals in this designated area that help retain the existing use.
Policy EV3	Maps required	<p>This policy should be accompanied by an overview map in the main document showing the location of the proposed 11 Local Green Spaces with a clear red line boundary around each, with the detailed maps of each individual Local Green Space available in the Appendices (as currently). However these maps should have a clear red line boundary around the proposed designation. It is unclear why the maps in Appendix 2 A-K have grey arrows and red bullet reference points. The designated areas should also be shown on the policies map.</p>
Policy EV4	Amendment to text	<ul style="list-style-type: none"> • The Council is supportive of the ambition of the policy to recognise the heritage value of existing avenues of trees. • However, whilst regrettable, it is considered that the aim of the policy to create new avenues of trees is of an era and unlikely to be compatible with modern developments. Their longevity is also a future issue, owing to species being vulnerable to disease, taking a while to establish and issues surrounding ongoing maintenance, including if trees in the avenue need to be removed (i.e. due to death or decay). As noted in the supporting text, sometimes access to the highway verge is required for sewers etc., and they could impact on visibility splays. This element should be deleted or amended as below. • The policy refers to avenues of trees as identified on the policies map. It is not possible to comment on this element of the policy since there is no accompanying policies map. These

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		<p>should be identified and added to the policies map.</p> <ul style="list-style-type: none"> Recommended amendments to policy: “To recognise the heritage value of avenues of trees in Bracknell Development proposals will be required to recognise the heritage value of the existing avenues of trees shown on the policies map by retaining them and incorporating them within landscape design and/or wherever possible to create new avenues of trees, where possible in new developments over one hectare and/or to create tree lined corridors for roads, footpaths and cycleways.” In the glossary and supporting text explain difference between ‘avenue of trees’ and ‘tree lined corridors’. Policy links to EV6 and could be merged.
Environment and Community Pg. 23 and 24	Information	Move TPO content to an evidence base document. It is also important to note that because this was a snapshot from a live database, the data is now no longer up-to-date.
EV5, EV6 and EV7	Merge policies	The Council is supportive of the aspirations of the Neighbourhood Plan to protect and encourage planting of new trees. However it is considered that these policies could all be merged into one succinct tree policy about tree protection and planting, since the policy intent and the implementation of these policies is very similar. More detailed comments are provided against each policy number.
Policy EV5	Amendment to text	<ul style="list-style-type: none"> This policy uses different terms to define the spatial extent to which it applies. It is unclear what extent ‘Bracknell New Town’ covers (this should be shown on the policies map so the policy can be applied consistently and precisely), and it is also unclear why the second paragraph refers to the character of ‘Bracknell Borough’ when the Neighbourhood Plan does not have scope to look at the whole borough. Suggest amending the policy as follows so it helps to achieve the policy intent: “Development proposals must demonstrate how they will maintain and enhance the current unique treed landscape character of Bracknell New Town as evident in the density extent and variety of its tree planting within the new town. Where new tree planting is provided, it must support the existing natural wooded character of Bracknell Borough New Town and by generally favouring native species unless alternatives are shown to be beneficial for instance for disease tolerance or for specific landscape design.” Move last element of the final sentence to supporting text. It is suggested that the Town Council considers amending the policy to increase ‘canopy cover’. This could be a positive aspiration which results in increased tree planting, whereas

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		the existing policy mainly seeks to protect existing or encourage native species when schemes require tree planting. This could link to the benefits of air quality which is an objective of the Plan.
Environment and Community Pg. 26	Typo	Supporting text refers to the Neighbourhood Plan introduction page 5, but this information is on page 6. Also, Neighbourhood Plan should be written out in full, unless 'NP' acronym added to the glossary.
Policy EV6	Consistency	<ul style="list-style-type: none"> There is an opportunity for this policy to be expanded to include veteran trees and ancient woodland. The NPPF sets out circumstances when permission for the loss or deterioration of such habitats may be granted permission "unless there are wholly exceptional reasons and a suitable compensation strategy exists" (para. 175(c)). Suggest amending the last sentence to: "... arboricultural survey <u>that identifies and demonstrates that the development will not harm any important</u> establishes the health and longevity of any affected trees."
Policy EV7	Amendment to text	<ul style="list-style-type: none"> Suggest amending first sentence to: "contribution to the visual amenity <u>and character</u> of the area." Suggest amending second part of policy as follows to strengthen it: "<u>Wherever possible</u> Proposed developments in Bracknell Town that <u>should</u>:longevity (eg-to enable them to provide a significant contribution to the visual amenity of the area which will constitute a legacy for local residents) will be supported." Impacts on views are not planning policy considerations; there is no right to a view. It is also considered that seeking highly visible locations contradicts with the requirement that they do not have a detrimental impact on views. The element of the policy needs further consideration. The requirement in brackets for trees to provide a legacy for local residents is not related to land use and should be moved to the supporting text. The policy could also look at potential highway impact, or the cumulative impacts on trees that development can have.
Policy EV8	Opportunity to expand scope/ Consistency	<ul style="list-style-type: none"> The Council is supportive of the aspirations of this policy. However the Council believes there is an opportunity for this policy to increase allotment provision to meet existing local need (which the Plan identifies). Recommend looking at Play and Open Space Strategy; the Town Council should look at the local need and create a target that the policy could seek to

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		<p>achieve. This could be by defining the proportion of allotments required as a percentage of increased population within the Neighbourhood Plan area for example.</p> <ul style="list-style-type: none"> • If increased provision is covered by policy EV1, links between the policies would benefit from being clearer. This policy could be merged with EV1 and EV2. • The last paragraph states “where there is sufficient existing provision contributions will be sought towards their improvement.” If there is sufficient existing provision, it is not lawful to seek contributions. See comments provided on policies EV1 and EV2. • Recommend amending wording of criteria 1: “The scale of the alternative site must be of an equivalent scale to the existing allotment provision lost and...” • Amend “Proposals map” to “Policies Map”.
Environment and Community Pg. 33	Factual amendment	Under Policy Intent, the text refers to the emerging Comprehensive Local Plan. This should be amended to ‘Bracknell Forest Local Plan’.
Policy EV9	Observation	If the land adjacent to Larges Lane is an allocation for this use, it should be shown on the Policies Map.
Environment and Community Pg. 34 and Pg. 38	Suggested amendments	<p>The map could be enhanced to show additional information on overland flow routes and smaller tributaries of the watercourses by using the surface water flood maps for the Borough an extract of which is provided below.</p> <p>These maps show the existing valleys and depressions where water will flow during heavy rainfall events. This information could be key to supporting the Lost Rivers of Bracknell map in Illustration 31 (which is very valuable and appears well researched) and if used together with reported flood incidents, could provide important evidence to inform planning decisions and potentially obtain funding for river enhancement schemes. Such an example of this is Woking District Council, which was recently successful in obtaining lottery funding to reinstate the Hoe Stream through Woking, which will have multiple benefits in terms of flooding, recreation, water quality and ecology. The reinstatement of the Gomoor Stream, whilst smaller, could have similar benefits.</p>

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Environment and Community	Observation	The text refers to 'Bracknell Forest Local Development Framework pack, September 2006'. This document is now 12 years old and information contained within it will likely have been superseded; it should not be referred to.

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Pg. 35		
Environment and Community Pg. 35	Information/ Suggestion	<p>The Plan has an opportunity to further develop the Green Infrastructure section and use this as an opportunity to identify Bracknell Towns' blue infrastructure that has been lost, and discussion of the natural links of ditches and watercourses.</p> <p>There is no mention of River Basin Management Plans or Water Framework Directives which classify the Bull Brook and the Cut as failing watercourses. Nor of the river basin catchments that we fall into (two different ones) which have requirements to improve the quality of the watercourses.</p>
Environment and Community Pg. 37	Suggested amendment	<p>The SUDS section should make reference to Bracknell's Local Flood Risk Management Strategy which sets out clear requirements for SUDS. It is unclear why reference is made to Hillingdon's statement when Bracknell Forest Council has specific strategies to promote the use of SUDS.</p> <p>A more relevant definition of Green infrastructure should be used. For example from the PPG:</p> <p><i>'Green Infrastructure is a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities. Green infrastructure is not simply an alternative description for conventional open space. As a network it includes parks, open spaces, playing fields, woodlands, but also street trees, allotments and private gardens. It can also include streams, canals and other water bodies and features such as green roofs and walls'</i></p> <p>(Planning Practice Guidance: Natural Environment Paragraph 027 Reference ID 8-027-2160211 https://www.gov.uk/guidance/natural-environment#para027)</p> <p>Or from Natural England:</p> <p><i>'Green Infrastructure is a strategically planned and delivered network comprising the broadest range of high quality green spaces and other environmental features. It should be designed and managed as a multifunctional resource capable of delivering those ecological services and quality of life benefits required by the communities it serves and needed to underpin sustainability. Its design and management should also respect and enhance the character and distinctiveness of an area with regard to habitats and landscape types.'</i></p> <p><i>Green Infrastructure includes established green spaces and new sites and should thread through and surround the built environment and connect the urban area to its wider rural hinterland. Consequently it needs to be delivered at all spatial scales from sub-regional to</i></p>

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		<p><i>local neighbourhood levels, accommodating both accessible natural green spaces within local communities and often much larger sites in the urban fringe and wider countryside.'</i></p> <p>(Natural England's Green Infrastructure Guidance (NE176), Land Use Consultants (2009). http://publications.naturalengland.org.uk/publication/35033)</p>
Environment and Community Pg. 39	Suggested amendments	<p>The 'policy intent' section identifies several areas to target improved access to watercourses - it would add value to map these locations, since reference to enhance the character and the function of 'the watercourses' is vague.</p> <p>The policy intent could also mention 'deculverting'.</p>
Policy EV10	Opportunity to expand scope/ suggested amendments	<ul style="list-style-type: none"> • The intent of the policy to enhance the character and function of watercourse and to improve public access to them is welcomed. It is considered to fit well with Green Infrastructure within the draft Bracknell Forest Local Plan. • The policy focusses on access to watercourses and river corridors; it does not go on to address the important 'hidden rivers' theme identified within the Policy Context section. It would add value to extend the policy to support opportunities to open up culverts/ deculverting/ naturalising the watercourses where practical to do so, particularly given the extent of mapped culverts through the Neighbourhood Area. The policy could maximise opportunities to reinstate the lost Rivers. This would increase the availability of watercourses in the area available for recreation, as well as support improvements to water quality/biodiversity. • It is recommended the policy makes specific reference to SUDS that improve water quality, which would support the watercourses and enhance the environment and align with the requirements of the Water Framework Directive. • It is unclear if the term 'closely related' refers to proximity or function. If it is proximity, the term will limit application of the policy to a very small number of developments, and could be interpreted to actually encourage riverside development that could conflict with floodzones and protections of natural river corridors (which would not be consistent with national policy, and therefore not meet the basic conditions). Therefore consideration should be given to using a broader term. For example, a development may not be adjacent to a river, however the development may be able to facilitate access to a path that leads to a watercourse; or to fund improvements closer to a watercourse – at the moment such a development is unlikely

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		<p>to be captured by the policy.</p> <ul style="list-style-type: none"> • It is unclear what the policy means by 'approaches to them'; this should be clarified. • Consider amending the policy text of the last sentence to: "...take advantages of opportunities to improve their environment <u>of the watercourse or river corridor</u>, including <u>and to improve public</u> access <u>to it.</u>" • The watercourses and river corridor information should be shown on the policies map.
Environment and Community Pg. 41	Information	It should be noted that the areas the Plan refers to regarding Winkfield and Crowthorne parishes are already designated as Special Protection Areas (SPA). The conservation objectives of the SPA must be considered and may not fit with the conversion to native broadleaf woodland. Since this is outside the scope of this Neighbourhood Plan, consider removing the wording.
Policy EV11	Suggested amendments	<ul style="list-style-type: none"> • The Council is generally supportive of the ambitions of the policy, but consider application of the policy as currently worded is severely limited. • The policy wording: "Any development proposal which is required to be accompanied by an environmental statement" severely limits the application of the policy; the vast majority of planning applications in the Borough are not accompanied by an environmental statement. Consideration should be given to the nature and scale of developments to which this policy should apply. • Para. 1 refers to European Union limits for air pollution. Consideration should be given to referencing the relevant UK legislation instead since the Plan period extends to 2036. • Para. 2 refers to a breach of limits – it is unclear how this applies in Air Quality Management Areas (AQMA) where limits are already breached? Developments would be expected to reduce the existing air pollution in order to be able to proceed. • Overall, the policy needs to be clear if it is considering the impact of air pollution on human health or biodiversity or both. The EU limits provide values for both; the policy context in the Neighbourhood Plan focuses on human health. Air quality in relation to European Sites (the SPA and Special Areas of Conservation (SAC)) is a significant issue. • It would be beneficial if links were provided to other parts of the Plan that would help to reduce air pollution, such as street trees, maintaining traffic flows, reducing vehicle use etc., so that the issue is considered holistically.
Environment and Community	Observation	Illustration 33 groups the age brackets in an inconsistent manner – 15 year olds are their own entry, whereas 30-44 year olds are grouped. The commentary is therefore affected, and also refers to percentages which are not shown on the graph. Whilst interesting local information, it is unclear how

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Pg. 45		it links to the policies that follow. The graph is also labelled Illustration 6 as well as illustration 33.
Policy EV12	Consistency	This policy conflicts with the ambitions of EV3; please see EV3 for further information.
Environment and Community Pg. 50	Factual amendment required	<p>The supporting text on this page refers to the “two local authorities, (BFBC and BTC)”. Bracknell Town Council is not a local authority. BFBC should also be amended to BFC.</p> <p>It should also be noted that permitted development rights with regards to the use class order have been amended in recent years to increase the flexibility to change between different uses without the need for planning permission. It is therefore worth considering whether it is possible to achieve the ambitions of the proposed policy in this context.</p>
Policy EV13	Observation	The Council is supportive of improvements to community facilities. However the term ‘colocation’ should be defined in the glossary or supporting text, so the policy can be applied consistently and precisely.
Policy EV14	Observation	<p>It is considered that an improvement is the same as an enhancement. If the policy intends to differentiate, the support text should set out how this is done. Recommend removal of one of the terms.</p> <p>Consider giving “community facilities” a more precise definition, unless the policy is intended just to relate to those listed in appendices 3.5 and 4?</p>
Heritage Pg. 2	Observation/ Suggested amendments	This section seems to focus primarily on parks and trees rather than heritage assets. It is therefore recommended the Town Council consider moving these policies to the section relating to trees/ landscape. There needs to be a clear distinction between policies relating to protecting/ enhancing OSPV (EV1, EV2) and heritage assets, including Registered Historic Parks and Gardens, of which there is only one in the Bracknell Town Neighbourhood Area (South Hill Park).
Heritage Pg. 3	Information/ suggested amendments	<p>It is noted that this section relates to Easthampstead House and associated park along with avenues of trees which is identified as being an important characteristic, to both Easthampstead Park and the townscape. It is considered this section would benefit from being simplified, i.e. to recognise the importance of Easthampstead Park and its forthcoming sale which will enable improvements to the fabric of the building and parkland, and to link this to being in the interests of the heritage asset. References to viability should be linked to the conservation of the heritage asset (see NPPG: https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-env in particular the section on the viability of a heritage asset).</p> <p>The term ‘sustainably accessible’ should be defined. If it is considered that the sale should ensure improvements to the building and be a use that could be accessed by members of the public, then this should be made clear.</p>

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Heritage Pg. 4	Observation	<ul style="list-style-type: none"> It is unclear what is meant by 'parkland features' i.e. whether this is landscape features within existing parklands or parks within Bracknell Town. The text seems to suggest that the intention is to seek to protect existing parks given their significance in the evolution of the New Town. However, in policy HE1 – reference is made to 'parkland features'. The policy context states that the historic parks and houses include Easthampstead Park, Lily Hill Park and South Hill Park. However these are not the same as registered historic parks and gardens in the normal planning sense. The change in definition is therefore confusing to the user.
Heritage Pg. 4-7	Observation/ Suggested amendments	<ul style="list-style-type: none"> These pages focus on the history of specific buildings. It would be more helpful to the reader if these pages identified what was important to the Town Council, i.e. the historic context of the Town as a new town, the evolution of the town (masterplanning/ creation of neighbourhoods and connections between places and open spaces), importance of designated assets, how buildings and places have shaped the town, non-designated heritage assets/ buildings of local significance (i.e. support to designated locally listed buildings). It should be noted that Easthampstead Park is not referred to in 'Saved' BFBLP Policy EN12 because it is not a Historic Park or Garden. If the Town Council considers that this is an omission, it should be addressed through seeking a listing from Historic England. It should be noted that BFC does have a Conservation Officer. The Policy Intent does not align with Policy HE1 at present, since only one of these is a Registered Historic Park and Garden.
Heritage Pg. 5, 12 & 13; Housing and Character Pg. 5, 6 & 20	Factual amendment required	These pages refer to an old version of the SHELAA from 2016. The current version of the SHELAA can be found here: https://www.bracknell-forest.gov.uk/planning-and-building-control/planning/planning-policy/draft-bracknell-forest-local-plan/evidence-base Easthampstead Park is not included in the version of the SHELAA forming part of the draft Bracknell Forest Local Plan evidence base. References and images from this old version and former site BRA2 should therefore be removed.
Heritage Pg. 8	Factual amendment required/ suggested amendment	The policy justification refers to the Comprehensive Local Plan to 2036; the emerging local plan is the Bracknell Forest Local Plan to 2034. Reference is made to the NPPF and the significance of a designated asset, but this is the first time that reference has been made to 'designation'. The Council considers this should be a starting point within the policy i.e. refer to https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment#decision-taking-historic-environment for more information and also Historic England Guidance

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		https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/ and https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/
Heritage Pg. 9	Factual update required	Refers to Easthampstead Park being in joint ownership between BFC and Wokingham BC. Easthampstead Park is owed by BFC.
Policy HE1	Suggested amendments	<p>The Town Council could consider two options for this policy:</p> <ol style="list-style-type: none"> 1. Change the policy to 'Protection of Historic Parks and Gardens', and refer to avoiding harm to existing historic parks and gardens and their settings including landscape features. In the supporting text explain how this would be applied to South Hill Park. 2. 'Protection of Parkland Features of Important Parks and Gardens' so as to widen the scope to include unlisted sites. Identify important elements that make up the parkland features in the supporting text, e.g. historic park and garden (SHP), listed building and setting including trees (EHP) and trees (LHP). The detail currently included in the last sentence of the policy should be moved to the supporting text. <p>However as currently worded, the policy confuses terms and provides detail on a site that is not a Historic Park and Garden. Also look to avoid duplication with other policies in the Plan (EV4). The policy should take into account the tests and balance that must be considered when proposals affect heritage assets as set out in the NPPF (including the significance of the asset, the level of harm and potential impacts), in order to meet the basic conditions. See Chapter 16 of the NPPF (2018).</p>
Policy HE2	Suggested amendments	<ul style="list-style-type: none"> • The Council is supportive of the objective of the policy, but reference needs to be made to the significance of the heritage asset and need to ensure that steps are taken to ensure that a development avoids harm to the heritage asset and where possible enhance the asset. • Since the second part of the policy may not be a comprehensive list, it is recommended that this is put into the supporting text to explain what this will mean in practice. When drafting the supporting text reference should be made to designated and non-designated heritage assets to include locally listed buildings (as in Appendix 15) having regard to the call for nominations to the BFC local list. • As with Policy HE1, the policy should take into account the tests and balance that must be considered when proposals affect heritage assets as set out in the NPPF. • Suggest amending the policy as follows: "Development proposals will be expected to: <ol style="list-style-type: none"> i) Have regard to the significance of the heritage asset and to demonstrate the impact of the development on the heritage asset;

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		ii) Demonstrate how the proposal will avoid harm to the asset and where possible enhance the asset.”
Policy HE3	Suggested amendment	This policy is very similar to HE2. Redrafting of HE2 can relate to all heritage assets whether designated or non-designated, and so will cover the content of HE3. Any specific buildings/ assets should be referred to in the supporting text.
Housing and Character Pg. 7 & 9	Information	The text states that the disparity between house prices and income could be due to the New Town Housing in the 1950s. The Berkshire Strategic Housing Market Assessment including South Bucks (2016) (SHMA) considered the issue of house prices in detail; it is recommended the Town Council look at this document. The SHMA would have more up-to-date information to use in the Neighbourhood Plan. https://www.bracknell-forest.gov.uk/planning-and-building-control/planning/planning-policy/draft-bracknell-forest-local-plan/evidence-base The SHMA also looks at the relationship to London which the Neighbourhood Plan discusses. This would provide local evidence for this section.
Housing and Character Pg. 12 & Transport and Infrastructure Pg. 6	Factual amendment required	Bracknell Forest Homes (BFH) is now called Silva Homes. All references to BFH in the Plan should be updated accordingly.
Policy HO1	Remove policy	Whilst the Council understands the ambitions of this policy, since the Town Council has not commissioned its own assessment of Local Housing Needs, this policy appears not to be based on sound evidence. The policy can only be justified by a local (Bracknell Town) housing needs assessment, which is not something that BFC has. BFC only maintains information for affordable housing (in accordance with all relevant legislation), not market needs and demands. The Western Berkshire local authorities will be undertaking further housing needs assessment for mix, sizes and tenures, but this will be at a higher level and not at the Neighbourhood Area level. The policy also needs to set a threshold for which new residential developments would be captured by the policy. The strategic nature of this policy, in addition to a lack of local evidence, means the Council recommends it is removed.
Policy HO2	Amendment to policy required	<ul style="list-style-type: none"> As with Policy HO1, the Council does not maintain local housing needs survey/ data. The Council only maintains the Housing register/ waiting list, but this does not cover market housing. This would need to be data commissioned by the Town Council, and would not be

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		<p>something BFC would maintain. The policy therefore requires redrafting.</p> <ul style="list-style-type: none"> It is unclear why sites of 10 and 25 dwellings are distinguished, and why the policy seeks for development proposals over 25 dwellings to include 1 bedroom dwellings. Evidence to justify these requirements would be needed. This policy has the opportunity to seek to meet the needs of residents now and within the lifetime of the plan, i.e. housing for an aging community, mobility issues etc. The supporting text refers to bungalows, but is silent on whether or not the Town Council would like to see these retained or new ones built.
Housing and Character Pg. 22	Suggested amendment	Four definitions are provided, including 'Windfall site'. Since this does not form part of the policy, it is unclear why this definition is included. It should also be noted that windfall sites do not only constitute previously developed land.
Policy HO3	Suggested amendment	<ul style="list-style-type: none"> Whilst the Council acknowledges the intent of the policy, the policy requires clarity and is also considered to have overlap with policies HO10 and HO11. Suggest amending text to remove wording in brackets, since it is unclear if it would just be extensions on infill properties for example). Unclear what 'protect the amenity' means; this should be defined. The Council's Design SPD has back to back distances. The second part of the policy effectively repeats the first; recommend it is removed. This policy would benefit from being merged with HO10 and HO11 to create a comprehensive local character and design policy. Unclear if this policy is meant to link to Section 8, and if so, how.
Housing and Character Pg. 24	Suggested amendment	Suggest amending text as follows: " According to Chief Housing Officer Simon Hendey (Nov 4th 2015), <u>Through information from customers accessing the Welfare and Housing Service</u> , there are concentrations..."
Policy HO4	Information	<p>Due to permitted development rights, the application of this policy will be very limited; only properties with over six bedrooms require planning permission. The majority of known HMOs by the Council are under this threshold.</p> <p>The Plan should define what it considers to be an 'over concentration' as per the fifth bullet.</p>
Housing and Character Pg. 27	Observations	<ul style="list-style-type: none"> The text in the third paragraph could be clearer, unsure what 'roads with more traffic than the cul-de-sac roads accessed off them' means. In the fourth paragraph – is it perceived or actual. Instead of planning applications, consider this should be permissions, since the text refers to

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		<p>conditions.</p> <ul style="list-style-type: none"> • Hardstanding and crossovers are mainly covered by permitted development.
Policy HO5	Suggested amendments/ opportunity to amend scope	<ul style="list-style-type: none"> • The Council is supportive of the intentions of this policy. • Suggest amending first sentence: “Where proposed work to a front garden of an existing dwelling requires a planning application, this should demonstrate that it will.” • Suggest amending B to “where possible”, and adding “and” at the end of the criteria. • It is unclear why C is only ‘where possible’. Permeable surfacing is covered by permitted development. • The policy could be expanded to include a requirement to balance parking requirements and streetscene retention/ character. Photo 21 illustrates a car overhanging the highway; the policy could consider these sorts of issues also.
Policy HO6	Information/ observation	<ul style="list-style-type: none"> • It is suggested amenity should relate to the existing character of the streetscene, or the intended design rationale as set out in the Design and Access Statement for the development. This is because it is unclear what ‘sufficient’ is, and for whom it should be sufficient. • Waste and recycling should be kept out of the streetscene, as per BFC guidance; provision and ease of access to take all bins to the rear of properties in house developments should be provided. • Bin and cycle stores for apartment blocks should not be in a visually dominant location in the streetscene, but either be integral to the design of the block, or set back and screened from view within the streetscene. • The policy is silent on planting and gardens, although these are key issues picked up in the Housing and Character section. However, the planting strategy will depend on the character being created on the site or responding to existing character. • The formatting of the third bullet makes the text confusing.
Housing and Character Pg. 30 & 32	Definitions	The definition of Streetscene provided on page 30 is different to that on page 32. This term should be defined in a glossary, which would avoid duplication and differences.
Housing and Character Pg.32	Observation	<ul style="list-style-type: none"> • The policy justification refers to EN20 v. However this is not linked to biodiversity, but relates to security. A different policy should be referenced. • The quote from the Biodiversity Action Plan relating to hedgehog street is duplicated on page 33.

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Policy HO7	Suggested amendments/ opportunity to expand policy scope	<ul style="list-style-type: none"> The Council generally supports this policy. Suggest amending the title of the policy to 'HO7 Private Gardens: Green infrastructure and biodiversity networks' which better reflects the policy content. Suggest amending text to "The layout of private gardens in all future development should help to ensure the biodiversity network of green space corridors infrastructure by providing this through the physical, visual connectivity of their design as well as linkages to adjoining public green spaces infrastructure. In infill development this will be provided by maintaining any existing connectivity or by implementing it." This is because the 'network' theme is important in green infrastructure; not all green spaces will be 'public'; and 'green infrastructure' is a broader term than 'green 'spaces'; 'green infrastructure' can include green spaces, corridors, stepping stones etc.
Policy HO8	Information/ remove policy	The Council does not consider fire sprinkler systems is a planning matter. Under Part B of the Building Regulations, sprinklers are only required in blocks of flats with a storey at 30m or more above ground level. Otherwise, they are only used as a compensatory feature, i.e. for designs which do not strictly comply with other fire/life safety requirements.
Policy HO9	Observation/ suggested amendment	<ul style="list-style-type: none"> The policy is not specific and therefore will be hard to enforce. It is unclear what the term 'recycling' refers to - waste, water, energy etc. Suggested amendments: "Development proposals that will be expected to demonstrate best practice in energy efficiency and generation, the use of sustainable materials and the implementation of recycling will be strongly supported." Part L of the Building Regs covers energy performance of buildings and the suite of guidance can be found here https://www.labc.co.uk/guidance/technical-guidance/part-l1a-l2a-l1b-l2b-building-regulations-approved-document Part L is the government's approved plan for the energy performance and efficiency of buildings. Inspectors look at the energy efficiency of the building fabric and services within it to ensure certain CO2 emissions are met using SAP, SBEM or BRUKL calculations. They do not look for on-site generation. Water consumption is covered under Part G, but the Council cannot insist on rainwater harvesting if the consumption can be demonstrated to be less than 125l/pp/d.
Housing and Character Pg.44	Factual amendment	This page refers to the Comprehensive Local Plan; the emerging plan for the borough is the Bracknell Forest Local Plan.
Housing and	Observation	The CIL rates in the charging schedule had, under the regulations, to be based on viability. Viability

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Character Pg.44		evidence demonstrated that a CIL charge could not be supported in the town centre and the nil rate therefore does not represent a subsidy. The Council may review its CIL regime when the recommendations within the Ministry of Housing, Communities & Local Government's ' <i>Supporting housing delivery through developer contributions</i> ' public consultation (05/03/2018 – 10/05/2018) are confirmed. This may involve the commissioning and production of a new viability assessment and the inclusion of new rates for Central and Outer Bracknell in a revised CIL Charging Schedule.
Housing and Character Pg.50	Factual amendment	The first paragraph refers to the 'Character Areas Assessment DPD'. This should be 'Character Area Assessments SPD'.
Housing and Character Pg.52	Typo	The supporting text states that policy HO9 is in agreement with the Character Area Assessments SPD, but this is a policy about energy efficient not design.
Housing and Character Pg.50-52	Observation	The character and design section states that the Character Area Assessment SPD should be widened to define other parts of Bracknell Town. This is something that the Town Council could do and include within the Plan if there are particular areas of character that need maintaining. There is quite a bit about horizontal and vertical planning in relation to the town centre. However, the Plan does not state where it considers buildings of height would be appropriate. The Plan could look at some parameters for buildings height.
Policy HO10	Suggested amendments	<ul style="list-style-type: none"> • The Council considers this policy should be merged with Policy HO11 since they cover the same topic. • The policy is not considered to be fully in conformity with national or local policy, since parts of Bracknell Town were built at a low density, whereas modern policy requires land is used efficiently. Density is considered to be a crude measure in any case; grain of development is a better term • Unclear what the terms 'wider area' and 'in the surrounding Bracknell Town Neighbourhoods generally' mean; the latter implies areas outside of the Neighbourhood Area the Plan covers. These should be defined. • Suggested amendments: "...scale and bulk of buildings to the density, footprint, separation, scale and bulk of buildings in the surrounding..." • The word 'both' assumes that all prosperities have two neighbours.
Policy HO11	Suggested amendments	<ul style="list-style-type: none"> • The Council is generally supportive of this policy which seeks to respect existing local

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		<p>character.</p> <ul style="list-style-type: none"> • Clarity is needed on what 'further new' means in the policy. Suggest removing word 'further'. • It is unclear how applicants would demonstrate they have met the requirements of the second paragraph. Considered that the second paragraph is not needed. • The Council is supportive of the third paragraph which relates to respecting the existing character. Consider referring to respecting existing building lines and reference to boundary treatments also. Suggest amending the third paragraph to remove 'they' from the front of each bullet and begin the paragraph with: "New development proposals will:" • Suggested amendment to bullet 4 "they are similar in respect the form of to properties in the immediate surrounding area"
Housing and Character Pg.54	Typo	The next section is number 6 not 7.
Economy and Employment Pg. 2	Typo	The document being referred to is the 'West of Berkshire Spatial Planning Framework'.
Economy and Employment Pg. 3	Information	The Berkshire FEMA Study was the first part of assessing employment in Bracknell Forest; the second element was establishing any employment needs. Information on this can be found in the Central Berkshire Employment Development Needs Assessment, on the Council's evidence base webpage. Further work is underway to test the EDNA conclusions against current market signals.
Economy and Employment Pg. 4	Information	The Council can provide the latest data held on Gross Value Added (GVA) as discussed in the Plan on page 4, and also more up-to-date economic information for Bracknell Forest.
Economy and Employment Pg. 12	Observation	The first paragraph refers to an illustration map A2. It is unclear where this information is in the plan.
Policy EC1	Suggested amendments	<ul style="list-style-type: none"> • Whilst the Council is generally supportive of the aims of the policy to support small businesses, it has some concerns over the elements of the wording of the policy. • It is considered supporting small businesses in former garage blocks would be contrary to other elements of the Plan, including the requirements of design and character policies and possibly policy TR4 also. The Council has concerns about the loss of parking spaces; if former garage blocks are to be lost, the Council would still require those parking spaces to be

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		<p>re-provided. The Council does therefore not support this element of the Policy.</p> <ul style="list-style-type: none"> • It is unclear if the policy is for redevelopment, or change of use. • The policy is not considered to be fully consistent with BFC's vision and policies for Bracknell Town Centre.
Policy EC2	Amendments suggested	<p>Since the first paragraph of the policy specifies it only applies to existing B1 floorspace, converting or splitting up units to accommodate micro or small businesses within the same use class, it is unlikely planning permission will be required. Therefore it is unclear what the purpose of this element of the policy is.</p> <p>The second element of the policy does not set out where support is provided; is it everywhere in Bracknell Town or just certain locations? If the latter, these should be established in the policy and shown on the policies map.</p>
Economy and Employment Pg. 21	Typo	The first paragraph refers to an appendix X.
Policy EC3	Suggested amendments/ observations	<ul style="list-style-type: none"> • The Council is supportive of the aims of the policy to ensure the continued vitality of neighbourhood shopping centres, however there are elements of the policy that are unclear and require redrafting. • It is unclear if this policy is only applicable to just original 'New Town' shopping areas (i.e. not Jennetts Park). If so, these should be shown on the policies map so it is clear which area the policy applies to. • It is recommended the word 'successful' is deleted since it is unclear what "proportions of use classes" represents a "successful" neighbourhood shopping centre that new development proposals should seek to maintain and enhance. • The policy seeks to retain 'respective proportions of use classes in existing development' which would restrict changes of use that may actually support the vitality of the retail centre. It should also be noted that permitted development rights allow the change of use of certain uses to others without the need for planning permission, e.g. changing a takeaway (A5) to a shop (A1) would not require permission. Therefore it is not possible to retain respective proportions of use classes, and is considered unlikely that as currently worded the policy would meet the basic conditions. • Whilst the policy sets out what proposals will be "strongly supported", this does not give clear steer on what development would be considered acceptable in order that it can be used

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		<p>effectively in the determining planning applications.</p> <ul style="list-style-type: none"> The policy background should provide definitions for policy wording and be specific in terms of what development would be considered acceptable and what would not be.
Economy and Employment Pg. 25	Factual update required	<p>The background information names the principal of Bracknell and Wokingham College, but this person has left the organisation. Bracknell and Wokingham College is also merging with the Activate Learning group.</p> <p>It is unclear when the data used in the illustration 15 graph was produced.</p>
Economy and Employment Pg. 30	Information	<p>The Plan refers to SHELAA site BRA7; this is a proposed allocation in Policy LP3 of the draft Bracknell Forest Local Plan.</p>
Policy EC5	Amendments required	<ul style="list-style-type: none"> Whilst the Council supports the underlying ambitions of the policy to see continued redevelopment in Bracknell Town Centre, it does not consider this should necessarily be 'in line with other New Towns around London' (as stated in the Policy Intent on Pg. 30). Further the policy itself is considered too narrow. The Council would like to see mixed development in the Town Centre that extends beyond retail and residential, including for example leisure uses, employment space etc. The extent to which the policy applies should be shown on the policies map; the policy refers to the 'town centre, not included in the current regeneration'. This needs to be spatially defined on a policies map so it is clear where the policy applies.
Economy and Employment Pg. 32	Observation	<p>The background information provides detailed information from the Binfield Neighbourhood Plan; this should be Bracknell Town specific information.</p>
Policy TR1	Suggested amendments	<ul style="list-style-type: none"> The Highway Authority has demonstrated that it is open to joint working through a number of meetings with the Town Council which it is happy to continue doing to strengthen the existing network. However there will be no route through the Town Centre due to the possible conflict with pedestrians. The Town Centre can be approached and crossed using new footway/cycle links along Millennium Way and the western side of The Ring, and existing links on the Bull Lane approach, High Street, and the eastern side of The Ring. It is recommended that the policy is amended as follows: "Proposals to strengthen north south <u>cycle</u> links to the Town Centre and to make better provision for cyclists, proposals to link routes within the existing cycleway network at Bull Lane/ Folders Lane, Sandy Lane and Shepherds Lane will be strongly supported."

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		<ul style="list-style-type: none"> If this policy allocates specific routes these should be shown on the policies map; if it does not and provides general support, consider merging with Policy TC2.
Policy TR2	Suggested amendments	<ul style="list-style-type: none"> Comments as for bullet one of Policy TR1. It is recommended the policy is amended as follows: "Development proposals are expected to maintain and, where possible, enhance, improve and complete unfinished existing, where applicable, cycleways and footpaths to Bracknell Town Centre, including routes to schools and between them and residential neighbourhoods."
Policy TR3	Suggested amendments	<ul style="list-style-type: none"> The Highway Authority is happy to work in partnership to identify potential for improvement as and where funds are available. 360 new cycle parking spaces were created as part of the town centre regeneration, and new cycle parking spaces were created at the bus station as part of its redevelopment. All neighbourhood shopping centres have cycle parking facilities. Although improvements and additions to existing cycle racks are welcome, the Council does not consider the lack of cycle parking is a barrier to increasing cycling levels in the borough or Bracknell Town area. It is recommended the last sentence is amended as follows; "Where there is sufficient provision, cContributions will be sought towards new provision and their improvement of existing facilities."
Transport & Infrastructure Pg. 17	Observation	The text refers to inserting a land registry map; this is not available in the Plan.
Policy TR4	Suggested amendments/ consistency	<ul style="list-style-type: none"> The Council is supportive of the policy and replacing garages with parking spaces of parking courts. The Town Council should consider how this links to policy EC1. It is recommended a minor amendment is made to the last sentence: "... parking spaces of within parking courts."
Policy TR5	Information	The provision of drop-off and pick-up areas in schools must achieve a balance of providing for car trips whilst not encouraging them. The management of school drop-off and pick-up areas can only be achieved with the cooperation of the school. Equal consideration should be given to the promotion of sustainable transport modes and implementing School Travel Plans.
Policy TR6	Information	The regeneration of the town centre and associated developer contributions has enabled the Council to support additional evening and Sunday services. Operators have also extended commercial services - up to midnight on some services. Further developments need to be of a significant size if

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		they are to justify and fund new bus services. The ambitions of this policy are covered by CIL.
Policy TR7	Information	The Council supports the intent to provide increased provision of public toilets. The Council has receive requests to extend the opening hours of the toilets at the bus station later into the evening now The Lexicon is open, but this requires additional funding and can attract anti-social behaviour.
Policy TR8	Information/ Suggested Amendments	<ul style="list-style-type: none"> The scope of this policy has overlap with EV11 Air Quality. Consider merging these policies. The terminology used in the policy needs defining, e.g. what is 'a detrimental effect', 'air monitoring areas', 'sufficiently increased', 'unacceptable levels', and 'standing traffic'. Recommend amending the policy as follows: "New development proposals which will should avoid having a detrimental effect (for instance by exacerbating the current air pollution levels in or next to existing air quality monitoring areas (AQMAs) by proposing sufficiently increased traffic volumes on existing road accesses as to result in unacceptable levels or by sharing them with traffic for new developments to the same degree) on the living conditions of residents in existing developments will be strongly supported. Where a Transport Assessment or Transport Statement is required, it should, to the satisfaction to of the highway authority, directly address and mitigate any cumulative highway capacity and traffic management issues, in particular in relation to "standing traffic" on the A322 and A329." This is what Transport Assessments do so do not need a policy. Further, Transport Assessments would need to address the impact of development across the highway network as a whole and not just focus on the A322/A329.
Chapter 8	Amendments required	<ul style="list-style-type: none"> Whilst it is understood that this section provides descriptions and photos of existing development in Bracknell Town, it is unclear as to the exact purpose of this. Is this section intended to provide additional information over and above the Character Area Assessments SPD, or form the basis of a future update? Is the intention that development proposals in these 'neighbourhoods' should mirror the descriptions for any given road? If so, has consideration been given as to the types of developments the Plan would support in these areas (in the context of the aspirations of the Plan which seeks to address issues in Bracknell Town)? It is difficult to find which particular features or characteristics the Neighbourhood Plan wishes to see replicated (or not), especially as in some instances the photographs do not demonstrate the characteristics being described i.e. Park Road in the Bullbrook Neighbourhood links to photograph BB9, but this is of a sculpture not buildings.

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		<ul style="list-style-type: none"> The link to policies in the Plan is also unclear; it appears this section only links to HO11, despite there being several policies linked to character. The connection between this section and any policies needs to be clear and unambiguous. It also needs to be made clear how this section is to be used when determining planning applications (if that is the intention). Whilst red bullets and arrows on the maps link to the photographs and descriptions, it is unclear what the grey arrows with green references do. These maps also do not clearly show the extent of the individual neighbourhood boundaries, to which the descriptions would apply. It is recommended that this section is put into the 'Housing and Character' Section rather than at the end of the document.
Appendices – general comment		<ul style="list-style-type: none"> Appendices should be limited to essential additional information linked to policies, i.e. the Policies Map, Local Green Spaces maps A-K, Maps of Bracknell Town (Appendix 3), a Glossary of terms, reference list. Background information and evidence should be in a separate evidence base document, e.g. justification for Local Green Spaces (Appendix 2), history of Bracknell, newspaper articles, etc. Once the Neighbourhood Plan is made a decision maker would need to look maps containing key information that would inform their decision, but not the justification underpinning designations or background history of the area. Please note, any maps also need correct Ordnance Survey referencing, in addition to the source of the information (if applicable). If the Appendices are too large to be appended to the main document, a separate document can be created, but consistent page numbering for this document should be provided (and cross-referenced to in the Neighbourhood Plan accordingly).
SEA – update		<p>The SEA Screening Opinion issued in September 2016 identified the need for a Strategic Environmental Assessment; this has not been included within the pre-submission consultation version.</p> <p>A further SEA screening request has been made (the consultation for which ended 26th July 2018), and has determined that an SEA is <u>not</u> required. This is now the updated position of the Council.</p>