



Melanie Saville  
Clerk to the Council  
Crowthorne Parish Council

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xx March 2019

Dear Melanie,

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

Thank you for your email dated 4 February 2019, 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 service areas across the Council.

Technical comments are as follows:

- As drafted, concern is expressed that the design policies will constrain development in a manner not supported by national policy; will be difficult for a decision maker to use due to ambiguity; and will not necessarily achieve new development that is appropriate to its immediate surroundings. These issues could relate to a basic condition matter.
- It is recommended that consideration is given to amending the Crowthorne High Street and Station Parade policies, as it is not possible for a neighbourhood plan to change retail hierarchy designations. This is because they are designated within a strategic policy contained within the Development Plan. As a result, this could relate to a basic condition matter.
- As drafted the Broadmoor employment boundary indicated on the policy map differs from the designated employment area boundary shown on the Bracknell Forest Policies Map. This results in policy CR11 not being in general conformity with a strategic policy contained within the Development Plan, and as a result could relate to a basic condition matter.
- It needs to be made clear that the Neighbourhood Plan is not actively promoting links to the Thames Basin Heath SPA, as this would be in conflict with the Habitats Regulations, and could give rise to a significant effect on a European site. As a result, this could relate to a basic condition matter.
- It is suggested that consideration should be given to making the policies map clearer to ensure it can be used effectively by a decision maker. This may relate to a basic condition matter.

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- It is suggested that consideration should be given to amending the period that the Neighbourhood Plan covers, to match the period that the emerging Bracknell Forest Local Plan is likely to cover (2019 – 2036).
- The link between the Neighbourhood Plan objectives and policies needs to be more clearly established.
- The terminology used within the plan needs to be more consistent and clear to ensure that policies are implemented in a consistent way. In order to achieve this, it would be helpful if a glossary was included.
- In some instances, points within the design policies might be better merged and consolidated to avoid repetition of the same factors.
- A separate policy addressing trees is recommended, in order to deal with issues such as their protection, rather than trying to cover the matter within the design policies. A tree policy could also address tree protection.
- A separate landscape policy is recommended, in order to deal with issues such as the requirement to protect specific viewpoints rather than trying to cover the matter in the design policies.
- The Green Infrastructure policy has the potential to be expanded to cover a wider range of existing and potential Green Infrastructure and not be limited by the included Green Infrastructure Network Map.
- It is worth considering the inclusion of a separate 'Monitoring' section, as there are currently no indicators identified that should be used to monitor the effectiveness of the Plan.

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  
(Director: Place, Planning & Regeneration)

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Policy/ Para. Number	Suggestion	Comment
<b>Comments on the pre-submission draft Crowthorne Neighbourhood Plan</b>		
General comment – whole document		The Revised Local Development Scheme (LDS) for Bracknell Forest (February 2019), suggests that the Bracknell Forest Local Plan will cover now covers the period 2018 – 2036. However, ultimately, it may be necessary to use a base date of 2019. You may therefore wish to revise the period covered by the Crowthorne Neighbourhood Plan.
General comment – whole document		Reference to BFC planning policy documents and abbreviations should be checked to ensure they are correct and consistent.
General comment – whole document		Ensure the Neighbourhood Plan is referred to consistently throughout the document (for example there are references to the ‘Plan’, ‘Crowthorne Neighbourhood Plan’, ‘Neighbourhood Plan’ and ‘pre-submission Plan’).
General comment – whole document		Ensure Bracknell Forest Council is referred to consistently and correctly (ie. as ‘Bracknell Forest Council’, ‘BFC’, ‘principal authority’ or ‘local planning authority’ as opposed to ‘Bracknell Forest Borough Council’) throughout the document.
General comment – whole document		Consider ensuring that the document is easy to read, and that sentences aren’t too long, by using effective punctuation within sentences/paragraphs throughout the document.
General comment – whole document		It is not clear how the images and plans relate to the text, as they are not all cross-referenced. Images should be clearly numbered, including a title describing what the image shows, and if possible the source.
General comments – whole document		<ul style="list-style-type: none"> <li>- The Neighbourhood Plan needs a clear useable ‘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. where the location of various features referred to in the design policy which are sought to be protected/retained such as the ‘historic core’ referred to in Policy CR4).</li> <li>- Where maps do indicate the spatial extent of designations, the scale of the map and key used are not always clear. For example, within Map inset 1 the colours of the lines to show the Conservation Area and Crowthorne centre are very similar. The extent of employment areas is also not easy to pick out on the map.</li> <li>- If not addressed, this could relate to a ‘Basic Condition’ matter. This is because if the map is unclear, the influence of the policies will be unclear, and the plan may not be considered to meet the NPPF (2019) requirement that ‘plans should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals’ (para. 16(d)).</li> </ul>
General comment – whole		Paragraph numbering errors from para. 5.28 onwards; check and correct paragraph numbers.

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document		
General comment – whole document		Some pages within the document do not feature page numbers; ensure all pages are numbered correctly.
General comment – NPPF		Due to the timing of its preparation the document refers to the 2018 National Planning Policy Framework (NPPF). This was republished in 2019, so it should be updated to refer to the most recent version.
General comment – policies referring to ‘development proposals’		It is not always clear what proposals a Policy will apply to, as there is no definition of types of development.
General comment – references & 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. Those looking for the sources of such background information would then also know clearly where to look.
General comment – glossary of terms		Terminology used in the Plan needs to be more clearly defined 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. It would also be helpful if the first use of an abbreviation also included what is being abbreviated, in full.
General comment – whole document		Tree protection is not mentioned within any of the policies. Trees within the Parish are mentioned throughout the document, but there are no policies within the document that clearly outline how the plan intends to deal with existing trees or whether new trees need to be planted. Recommend a separate tree policy is included to deal with this issue that avoids conflict with existing adopted policies and emerging local plan policies. Additionally the plan should consider addressing Tree Preservation Orders (existing or potential), ancient woodlands, and veteran trees.
General comment – whole document		There are currently no policies that address the need to improve inclusivity, accessibility or footways and cycleways throughout the Parish.
General comments – design policies		<ul style="list-style-type: none"> <li>- In general, it appears that the various design policies describe and list features and attributes which exist in parts of the various identified character areas and aspirations. As written, it is considered that it would be not clear to a decision maker how to apply these criteria in their decision making. As a result, it is considered that the design policies in their current form may not meet the requirements of the basic conditions, as they do not have regard for the NPPF (2019) requirement that ‘plans should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals’ (para. 16(d)).</li> <li>- It is important to check that policies do not block innovation and high quality contemporary</li> </ul>

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		<p>design in appropriate locations, in order to ensure the policies are not contrary to the National Planning Policy Framework 2019 (NPPF, para. 127(c)). It is not appropriate to follow the traditional designs and/or customs within an entire area in all cases.</p> <ul style="list-style-type: none"> <li>- It needs to be clearer what the design policies are trying to achieve, as these policies do not define <i>how</i> development should have full regard to the mentioned features. For example, the policies do not set out whether particular features are to be retained and/or enhanced. For example, if an application for a two storey extension were being considered, point xi of Policy CR1 “Drawing from positive examples of renovations and extensions to existing properties” does not provide useful guidance for the purposes of decision making. It may be better to use phrasing such as proposals should relate well to their location, be appropriate in scale, layout, materials etc. The policies could set out clearly those features that new development must relate well to and enhance within each specific location within each character area (as each character area is subdivided into areas containing different styles/periods). It is suggested that references are made to street names, estates or locations in relation to other streets in order to achieve this. As a starting point, it may be useful to consider the Character Area Assessments SPD recommendations to guide the policies.</li> <li>- It is suggested that the design policies could be better formatted to state ‘development proposals must ... in order to be supported’, as their current wording suggests that proposals will be supported if they regard the ‘following design principles’ regardless of any other factors, and read as though they are guidance rather than policy.</li> <li>- The policies do not currently recognise that there is variation within each character area, and are too prescriptive in their current form, as each point will apply to the entirety of each whole character area, unless the policies state otherwise (see comment above).</li> <li>- It is recommended that some of the features of this policy are moved to separate tree and landscape policies to make it easier to use.</li> <li>- It is also noted that there are many references to gated entrances. Whilst these may exist in parts of the Parish, it is not considered that this is a dominant feature of the Parish, nor one which should be repeated and incorporated into new development proposals. This design approach does not support or promote inclusive communities.</li> </ul>
General comments – Implementation		<ul style="list-style-type: none"> <li>- A separate ‘Monitoring’ section should be included.</li> <li>- The Council will be required to monitor the effectiveness of Policies contained in the Plan (if it is made), through its Authority Monitoring Report.</li> </ul>

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		- As currently drafted there are no indicators identified that should be used to monitor the effectiveness of each Policy within the Plan.
Front page	Amendment to text	'as amended' is normally in brackets – '(as amended)'.
Foreword – whole section	Suggestion	Check through to ensure capitals are used consistently and correctly.
Foreword, 1 <sup>st</sup> paragraph	Amendment to text	Change 'and therefore within Bracknell Forest Borough Council as principle authority' to '; Bracknell Forest Council is the principal authority.'
Foreword, 3 <sup>rd</sup> paragraph	Amendment to text and suggestion	- Providing a reference to the Bracknell Forest Council 'Site Allocations Local Plan (SALP, 2013)', and the policies within the SALP allocating Broadmoor (SA4) and TRL (SA5), would help readers find these policies. - 'formally the TRL site' could be in brackets and should be 'formerly' rather than 'formally' – '(formerly the TRL site)'
		2 <sup>nd</sup> sentence: Recommend changing to 'The other large open areas within the Parish's boundaries are protected from development by both Special Area of Scientific Interest (SSSI) designation and the Thames Basin Heaths Special Protection Area (TBHSPA) designation. Therefore this plan aims to preserve and maintain the existing neighbourhood characteristics, settlement boundaries and strategic gaps between Crowthorne and other settlements.' to ensure easy reading.
Foreword, 6 <sup>th</sup> paragraph	Amendment to text	Suggest changing 'with in' to 'within'.
Para. 1.3	Amendment to text and factual update required	Please change '...the Bracknell Forest Core Strategy 2026, which will eventually be replaced by the Bracknell Forest Local Plan 2034 and will cover the same period.' to '...the Bracknell Forest Core Strategy, which covers the period up to 2026. The Core Strategy will eventually be replaced by the Bracknell Forest Local Plan, which will cover the period up to 2036.'
Para. 1.4	Observation and suggestions	- Suggest the description of what neighbourhood plans give communities the opportunity to do is broadened, as they allow other issues to be addressed (see Planning Practice Guidance Paragraph: 001 Reference ID: 41-001-20140306). Following this the limitations on the scope of the Crowthorne Neighbourhood Plan could be explained, resulting from the existing constraints

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		<p>on the area (such as the SPA, SSSIs etc).</p> <ul style="list-style-type: none"> <li>- Note Paragraph: 004 Reference ID: 41-004-20170728 of the Planning Practice Guidance suggests Neighbourhood Plans can include non-land-use policies so long as they are clearly identifiable (a way of achieving this would be to have these within an annex). Therefore the text that states 'This often means that there are important issues of interest to the local community that cannot be addressed in a Plan if they are not directly related to planning' should be amended to highlight this.</li> </ul>
Para. 1.5	Amendment to text	Suggest the first bullet point is changed to 'Is the Plan consistent with national planning policy and guidance?' and the third bullet point is changed to 'Does the plan contribute to the principles of sustainable development?' in order to align these with what is stated within Planning Practice Guidance (Paragraph: 065 Reference ID: 41-065-20140306).
Para. 1.7	Suggestion and amendment to text	<ul style="list-style-type: none"> <li>- Recommend that National Planning Practice Guidance (NPPG) is also mentioned, as this also should have informed the Neighbourhood Plan.</li> <li>- Suggest changing 'Its reports are...' to 'Its evidence is contained within reports which are...' to make it clear what these reports are.</li> </ul>
Para. 1.8	Observation	It is noted that the Parish Council will set out how the Plan will contribute to achieving sustainable development in Crowthorne in its final submission documents. Therefore we cannot comment on this at this stage.
Para. 1.9	Observation	Can confirm that this is correct regarding compliance with the Habitats Regulations.
Para. 2.4	Amendment to text	Suggest changing '...but the area remains low density...' to '...but despite this the area remains low density...' for clarity.
Para. 2.5	Amendment to text	Suggest changing '...clearly defined village centre...' to '...clearly defined settlement boundary...' as the village centre is not adjacent to Wokingham Without and Sandhurst.
Para. 2.6	Suggestion and observation	<ul style="list-style-type: none"> <li>- May wish to make it clear that Crowthorne Parish is being referred to here rather than the entire settlement of Crowthorne.</li> <li>- Review the second sentence within this paragraph as it is not currently clear what the first half of this sentence means. Is it referring to population growth slowing since 2001, or is it referring to population growth being slow when compared with the rest of Bracknell Forest since 2001?</li> </ul>
Para. 2.7	Amendment to text	<ul style="list-style-type: none"> <li>- Recommend adding '...and provides valuable employment space within the Parish.' to the end of the first sentence.</li> <li>- Recommend adjusting the second sentence as follows to improve readability: 'Following the introduction of permitted development rights for the conversion of employment to residential</li> </ul>

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		uses, a number of the units have been changed from offices to flats. This in turn has reduced the availability of affordable and flexible space for smaller businesses.'
Para. 2.11	Amendment to text	For clarity, suggest amending the first sentence to state '...low probability of fluvial flooding.' and amending the second sentence to 'However, some land within the Parish is vulnerable to surface water flooding'.
Para. 2.12	Suggestions	Recommend clarifying what section of the Bracknell Road (B3348) is covered by the AQMA as it is only a small section of the road. Also may wish to mention the section of Sandhurst Road that is covered by the AQMA.
Plan B	Observation	The SPA buffers are shown on this plan but these are not described anywhere in the document. What is their relevance to the Neighbourhood Plan?
Plan C	Observations	<ul style="list-style-type: none"> <li>- It is unclear what the purple lines are indicating. In the legend they are listed as 'likely impacts on SSSIs/SACs/SPAs and Ramsar Sites (England)'. But there appear to be multiple lines at varying distances from the sites. Do each of the lines refer to the same or different impacts?</li> <li>- It would be helpful if SSSI and SAC were referred to in full, rather than including them as abbreviations in the map title.</li> </ul>
Plan C and Plan D	Suggestion	Add a reference to the source of the plans, as has been done with Plan B.
Plan D	Observation	The plan indicates the positioning of Tree Preservation Orders (TPOs), but these are not mentioned anywhere else within the document. Recommend they are addressed within a tree policy.
Para. 3.3	Suggestion	Policies CS8, CS19 and CS21 are strategic policies and should be listed as such to avoid confusion, as they are mentioned as development management policies in the following paragraph.
Para. 3.4	Suggestions	<ul style="list-style-type: none"> <li>- Recommend making reference to the saved Bracknell Forest Borough Local Plan (2002) policy EN20, as this is a fundamental design policy in the Borough relating to Crowthorne.</li> <li>- Also recommend making reference to the Character Area Assessments SPD which has informed the Crowthorne Design Guide.</li> <li>- Note that whilst policy CS7, policy EN20 and the Character Area Assessments SPD are relevant, they are not strategic. It is therefore recommended that they are referenced under a separate heading (this could be named 'other relevant policies') to avoid confusion, as they are currently referenced under the 'Strategic Planning Policy' heading.</li> </ul>
Para. 3.5	Suggestion and amendment	Could remove repetition of the fact there is little room for expansion as a result of constraints within the Parish. Recommend a map is included alongside this paragraph indicating the extent of the SPA, settlement(s), Wellington College, Broadmoor and TRL to help explain the paragraph's context.



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	to text	
Para. 3.6	Amendment to text	Change ‘...however its reasoning and evidence base...’ to ‘...through its draft policies and evidence base...’
Para. 3.7	Amendment to text	<ul style="list-style-type: none"> <li>- Suggest changing ‘Due to this level of growth, added to which further development options...’ to ‘The current level of growth, as well as potential development...’ for clarity.</li> <li>- Suggest changing ‘redevelopment’ to ‘development’ as this is what it would seem the Parish Council is mainly considering.</li> </ul>
Para. 3.8	Suggestion and amendment to text	<ul style="list-style-type: none"> <li>- Change ‘There are other development plans’ to ‘There are other local plans’ as Local Plans are being referred to here.</li> <li>- Could explain why the Minerals and Waste Local Plans are not relevant to the Parish as readers may not know why.</li> </ul>
Para. 4.1	Observation	There is reference to an ‘ideas meeting’ and informal consultation exercises. More information in relation to these needs to be provided. This information should be included in the ‘Consultation Statement’ which will need to accompany the Submission version of the Plan. This will also need to summarise the main issues and concerns raised by the people consulted; and describe how these issues and concerns have been considered and, where relevant, addressed in the proposed Neighbourhood Development Plan.
Para. 4.2	Amendment to text	<ul style="list-style-type: none"> <li>- Recommend adding ‘to the local community’ after ‘important’ within the first sentence and the 1<sup>st</sup> bullet point, as it is important to differentiate between local importance and planning importance, as there are additional issues that are of planning importance. Also the first and last bullet points could be consolidated.</li> <li>- In order to make it consistent with the other points it is recommended that the 7<sup>th</sup> bullet point should be changed to ‘Over-supply of care homes – there is a perception that there is an over-supply of care homes and retirement properties.’</li> </ul>
Para. 4.2	Information	There are plans to extend an existing bus service to Crowthorne station as a result of the approved former TRL development.
Para. 4.2	Observation	It could be clearer how some of the land use issues highlighted have led to the vision and objective, and how they are addressed within the plan’s policies. For example, the provision of affordable housing is listed as being ‘important’, but is not mentioned within any of the plan’s policies. National Planning Practice Guidance states ‘A qualifying body should ... ensure that the wider community ... is made aware of how their views have informed the draft neighbourhood plan’ (see guidance: Paragraph: 047 Reference ID: 41-047-20140306). However, at the same time, it is important to ensure that policies do

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		not conflict with adopted strategic policies (for affordable housing this is Core Strategy policy CS17) and emerging strategic policies (for affordable housing this would be Draft Bracknell Forest Local Plan policy LP24). All policies also need to be based on evidence.
Para. 4.3	Amendment to text	For clarity recommend changing to 'Community feedback indicated that the Steering Group was on the right track and the work undertaken since the meeting has informed the policies in the plan. Any matters that cannot be accommodated within the plan's policies have been dealt with within Section 6.'
Para. 5.1	Amendment to text	Suggest 'heritage' is removed, as the plan aims to promote good design in any scenario within Crowthorne (whether there are heritage assets nearby or not).
Para. 5.1	Observation	Concerned that 'access to and enjoyment of the countryside' constitutes access to the SPA, as the majority of the countryside that adjoins Crowthorne Parish forms part of the SPA. Improved access to the SPA would be contrary to the Habitats Regulations. This could relate to a basic condition matter, as the basic conditions require that 'the making of a neighbourhood plan is not likely to have a significant effect on a European site (as defined in the Conservation of Habitats and Species Regulations 2012)'.
Para. 5.2	Observation	<ul style="list-style-type: none"> <li>- First bullet point – reference is made to 'new development contributing to the visual heritage'. Clarification is required regarding the reference to 'visual heritage'. If the aim is to have regard to the historic character of the Parish (which is explained in the introduction to the plan) then this should be reflected in the text. Heritage is more than what is seen but how spaces are experienced together with the significance of the space.</li> <li>- Last bullet point – The objective to 'maintain and enhance the quality and abundance of environmental assets and ensure no significant effects on the Thames Basin Heath SPA' is welcomed, but there are policies within the plan that appear to be in conflict with this objective (see comments on policies CR12 and CR13). This is because it appears that these policies are actively promoting links to the Thames Basin Heath SPA, with the potential to increase human activity which could cause harm to the protected species within the SPA. As noted above, this could relate to a basic condition matter, as the basic conditions require that 'the making of a neighbourhood plan is not likely to have a significant effect on a European site (as defined in the Conservation of Habitats and Species Regulations 2012)'.</li> </ul>
Para. 5.2	Amendment to text	Recommend changing the first bullet point to: '...ensure new development contributes positively to the streetscene... and landscape character...'
Para. 5.4	Information	Notes that reference is made to BFC's Local List – all nominations put forward by the Parish Council have been recommended for inclusion, see 12 February 2019 Executive Report: <a href="https://democratic.bracknell-forest.gov.uk/ielssueDetails.aspx?Id=81202&amp;PlanId=0&amp;Opt=3#A17563">https://democratic.bracknell-forest.gov.uk/ielssueDetails.aspx?Id=81202&amp;PlanId=0&amp;Opt=3#A17563</a>

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		(Also see comments on Appendices).
Para. 5.5	Amendment to text	Suggest changing '...and it is shown in...' to 'and is shown in...' as there is more than one policy.
Policy CR1: general comments	Observations	The policy states that 'Proposals should have full regard to the following design principles:' - but what follows is a list of characteristics of parts of the area rather than actual design principles. The same point applies to some of the numbered criteria in other design policies in the plan.
Policy CR1: general comments	Observations and suggestions	<ul style="list-style-type: none"> <li>- It is recommended that this policy makes it clearer what it is trying to achieve, as currently it does not define <i>how</i> development should have full regard to the mentioned features.</li> <li>- The first sentence is clear (i.e. 'all new development within Crowthorne must demonstrate'), but this is weakened by the second sentence which appears to be written as guidance (i.e. 'proposals should have full regard to'). Suggest re-wording of introduction, and after 'environment' in the first sentence state: 'Proposals will be expected to...'</li> <li>- As this is an overarching policy it should guide how applicants approach the design of new development anywhere within the Parish. As a result, whilst the information within the bullet points is informative for some areas within the Parish, it is too specific and prescriptive to cover the whole Parish, and thus in many scenarios is inappropriate (for example, it is not appropriate for all developments within the entire Parish to be of a red brick 'polite' domestic style). Additionally, much of the information is repeated within the following character area-specific design policies. Therefore this information should be removed from this policy, and the policy should be amended so that it dictates what general considerations should be taken into account when designing new development. For example, the Crowthorne Design Guide, section 6.1, states that when considering design proposals it should be considered whether the proposal pays careful attention 'to plot widths, building line, height, form, massing and scale, with reference to the existing pattern of development.' This could be rephrased and included within the policy as 'Plot widths, building line, height, form, massing and scale of new development must reference the existing surrounding pattern of development'.</li> <li>- Further clarity is required on what this policy intends to achieve in relation to trees. Currently it is not clear whether the policy aims to see existing trees retained, trees replaced whenever they are felled, and/or the planting of new trees. It is also not clear how any of this would be achieved. It should be noted that it will not be possible to replace trees of great stature. It would be helpful to have a separate tree policy that deals with these issues and avoids conflict with existing adopted policies and emerging local plan policies.</li> </ul>

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Policy CR1: general comments	Observations	<ul style="list-style-type: none"> <li>- In its current form this policy is very conservation orientated, which is appropriate for some areas of the Parish (such as the Conservation Area) but not others (such as TRL).</li> <li>- There are issues mentioned within this policy that would be better addressed within a separate landscape policy, such as the 'woodland landscape' and the 'dense vegetation wedges'.</li> </ul>
Policy CR1: general comments	Suggestion	<ul style="list-style-type: none"> <li>- The number of sub paragraphs could be reduced by grouping and consolidating related issues. This will reduce any overlap within the policy and aid clarity.</li> <li>- With respect to heritage in this policy it is recommended that a more generic reference is made to character; heritage and local patterns of development. National Planning Practice Guidance (NPPG) sets out guidance relating to the significance of a heritage asset, whether designated or non-designated, in decision making (see guidance titled 'Conserving and enhancing the historic environment').</li> </ul>
Policy CR1: general comments	Information	The 'test' for assessing the impact on the historic environment is prescribed within the Town and Country Planning (Listed Buildings and Conservation Areas (LBCA)) Act 1990, i.e. that the local planning authority has a statutory duty to preserve and enhance the character of a conservation area s72 of the LBCA refers.
Policy CR1: point i	Observation	It needs to be clear what is meant by 'polite domestic styles', as this term could be used very subjectively.
Policy CR1: points i and vi	Suggestion	It needs to be clear what is meant by 'historic buildings' (is this Listed Buildings, Local Listings, or other types of building?) and 'municipal buildings', as these terms could be judged very subjectively. Suggest referring to either 'heritage assets' or 'the existing characteristics within the new development's immediate surroundings' for clarity. If particular buildings are being referred to these could be identified on a map.
Policy CR1: point iii and iv	Observation	<ul style="list-style-type: none"> <li>- In the context of this overarching design policy it is inappropriate to state that the Parish is typically low density, as this is not indicative of the whole Parish (for example, the High Street is high density). It is therefore recommended that this is removed from the policy, as in its current form the policy could be viewed to be stating that all new development within the Parish should be low density. Otherwise this could prevent the policy from meeting the basic conditions, as the NPPF (2019) states that planning policies should 'promote an effective use of land in meeting the need for homes and other uses' (para. 117); and that they should 'ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)' (para. 127(c)).</li> </ul>

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		<ul style="list-style-type: none"> <li>- As an alternative the policy could state that ‘the density of any new development must be appropriate to its surroundings’.</li> </ul>
Policy CR1: point v	Observation	It is inappropriate to limit any new development across the whole Parish to 2 storeys. Some areas within the Parish, such as the TRL character area, or parts of the High Street, are suitable for development higher than 2 storeys. Limiting the height of development within the whole Parish to 2 storeys could prevent the policy from meeting the basic conditions for the reasons listed in the previous comment.
Policy CR1: point ix	Observation, Information and amendment to text	A SAC is a Special Area of Conservation of which there are none in Crowthorne. For information, the nearest SAC is the Windsor Forest and Great Park SAC which is located in the northern part of Bracknell Forest and in the Royal Borough of Windsor and Maidenhead (RBWM). Perhaps the reference ‘SAC’ is meant to relate to the Thames Basin Heaths Special Protection Area (SPA)? Remove the wording ‘(what is a SAC?)’. Abbreviations of terms should not be used independently within a Policy.
Policy CR1: point x	Observation and suggestion	Reference should be made to ‘boundary treatments’, not boundary ‘hedges’. In some locations, hedges will not be appropriate. However, a policy could state that new development should incorporate boundary treatments that reflect existing boundary treatments to avoid the erosion of existing character.
Policy CR1: point xi	Observation	This is not a helpful statement for a decision maker, as it is not clear what defining factors (scale, proportions, materials etc.) would make an extension ‘positive’, or exactly what these examples are. This point, therefore, needs to be more specific, and not solely related to the heritage properties within the Parish, as it must also be appropriate for areas of more recent development like TRL.
Para. 5.7	Observation	<ul style="list-style-type: none"> <li>- Applicants can only be required to demonstrate how they have responded to the requirement of the plan’s policy; they are not required to demonstrate how they have responded to the Crowthorne Design Guide 2018 or the Crowthorne Village Design Statement (VDS) 2002 other than through the policy.</li> <li>- It is worth noting, however, that these documents may be given ‘weight’ when deciding planning applications. Further weight can be given to them if they have been subject to public consultation, although this will not be the same ‘weight’ as that carried by Bracknell Forest Council Supplementary Planning Documents (SPDs).</li> </ul>
Policy CR2: general comments	Observations and suggestions	<ul style="list-style-type: none"> <li>- It needs to be clearer what this policy is trying to achieve, as it does not define <i>how</i> development should have ‘full regard’ to the mentioned features. The policy could dictate which features new development must relate well to and enhance within each specific location within the character area (as this character area is subdivided into areas containing different styles/periods). For example, the policy could state ‘Duke’s Ride should be maintained as a verdant streetscene, and new residential development on this road should feature large gardens with gated boundaries’ as</li> </ul>

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Policy/ Para. Number	Suggestion	Comment
		<p>existing development on Duke’s Ride has wholly different characteristics to those found within the Edgcumbe Park estate.</p> <ul style="list-style-type: none"> <li>- Suggest re-wording the policy so it states ‘development proposals must...to be supported’, as the current wording suggests that proposals will be supported if they have full regard to the ‘following design principles’ regardless of any other factors, and reads as though it is guidance rather than policy.</li> <li>- Points ii, iii and v should be consolidated into a single point.</li> <li>- Refer to the key features of the existing development (plot sizes, large front gardens, dormers in the roofs etc.) within the Edgcumbe Park estate that new development within the estate must adhere to along the relative locations (see previous comment).</li> <li>- Suggest using the Character Area Assessments SPD recommendations for the Edgcumbe Park character area (Area A) to guide this policy.</li> </ul>
Policy CR2: point ii	Observation	Further clarity is required on what this policy is aiming to achieve when it comes to trees. Does the policy wish to protect the existing trees?
Policy CR2: points ii and iii	Observation and suggestion	Remove reference to ‘20 <sup>th</sup> century housing development’, as this description fails to highlight the highly distinctive character of the estate, and could be descriptive of any 20 <sup>th</sup> century development in any location.
Policy CR2: points ii and v	Observation and suggestions	Point ii) acknowledges a lack of boundary treatments, whilst point v) notes gated boundaries. This appears to be contradictory and could cause confusion for applicants, and potentially lead to inappropriate boundary treatments within the estate. Therefore it is recommended that the policy is amended to indicate the characteristics of each of the areas within the character area, and to require applicants to propose developments that reflect their immediate surroundings.
Policy CR3: general comments	Observations and suggestions	<ul style="list-style-type: none"> <li>- It needs to be clearer what this policy is trying to achieve, as it does not define <i>how</i> development should have full regard to the mentioned features. The policy could dictate which features new development must relate well to and enhance within each specific location within the character area (as this character area is subdivided into areas containing different styles/periods).</li> <li>- Suggest re-wording the policy so it states ‘development proposals must...to be supported’ as the current wording suggests that proposals will be supported if they have regard to the ‘following design principles’ regardless of any other factors, and reads as though it is guidance rather than policy.</li> <li>- The policy does not currently recognise that there is variation within this character area, and is too prescriptive in its current form, as each point will apply to the whole character area, unless</li> </ul>

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Policy/ Para. Number	Suggestion	Comment
		<p>the policy states otherwise (see comment above).</p> <ul style="list-style-type: none"> <li>- Suggest using the Character Area Assessments SPD recommendations for the West Crowthorne character area (Area B) to guide this policy.</li> <li>- It may be useful to consider what is covered in the saved Bracknell Forest Borough Local Plan policy EN20.</li> <li>- It is unclear whether some of the bullets included within the policy are in fact references to specific roads/locations. If so, these should be identified, as not all parts of the character area include all of the features referred to.</li> </ul>
Policy CR3: general comments	Suggestion	Remove repetition within the policy (for example, large plots are mentioned within points iv) and ix)). Points should be consolidated wherever possible to improve clarity and readability.
Policy CR3: point iv	Observation and suggestion	<ul style="list-style-type: none"> <li>- Not all of the areas within this character area feature large houses with large plots, but as this policy covers the whole character area it currently suggests they do. The area also features cottages on small plots.</li> <li>- Additionally gated boundaries are not always appropriate, and in some instances boundaries consisting of vegetation are more appropriate. Define what part of the character area this relates to.</li> </ul>
Policy CR3: points v and vi	Observation	The guidance contained within point vi) is not appropriate for the majority of the character area. Point v) and point vi) when used together conflict as a result of this. Recommend stating 'development should be appropriate in terms of scale and massing to existing development in the vicinity' instead, and could state that 'red brick is the predominant building material of the area' in the supporting text.
Policy CR3: point vii	Observation	A definition of 'street trees' is required. Is the policy looking to keep 'mature street trees', or is it aiming to see further 'street trees' planted – or both? It will not be possible to plant new 'mature street trees'.
Policy CR3: point viii	Suggestion	Recommend that this point is amended to state that unpaved roads should be retained, as that is reasonable in terms of their contribution to the character of the area. However, the Highway Authority will not allow unmade roads on new developments (see this page for further details: <a href="https://www.bracknell-forest.gov.uk/roads-parking-and-transport/roads/road-adoption">https://www.bracknell-forest.gov.uk/roads-parking-and-transport/roads/road-adoption</a> ).
Policy CR3: point ix	Observation.	It is inappropriate to require 'grandeur' across all new developments within this character area, as this would not be reflective of the whole area. Define what part of the character area this relates to.
Policy CR3: point x	Observation	It is not clear what is meant by the 'historic core'; is it the Conservation Area? It is also unclear what the 'historic quality' specifically refers to.
Policy CR3:	Observation	It needs to be clearer what area this point relates to, as a defining feature of this character area is the

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point xii		variety of architectural styles.
Para. 5.11	Observation and suggestions	The last sentence is a repeat of that in para 5.6 above. It would be better here if, rather than making reference to the purpose of the policy in this last sentence, a more general statement along the line of 'new development will be expected to have regard to the character of the West Crowthorne Character area' is included. Another option would be to omit the reference altogether to the BFC Core Strategy Policy since that will be applied alongside the neighbourhood plan in any event.
Para. 5.12	Information	Reference is made to the impact on the setting of St John's Church. The impact on the setting of St John's Church will be a material consideration in the assessment of any relevant planning application, as it is a Grade II Listed building and the impact of any development on its significance must be assessed (NPPG - Decision-taking : historic environment Para 008 Ref ID : 18a-008-20140306 refers as do subsequent paragraphs).
Policy CR4: general comments	Observations and suggestions	<ul style="list-style-type: none"> <li>- There is an overlap with the spatial extent of this policy and CR9. These policies could be merged to provide a single policy relating to the High Street area.</li> <li>- It needs to be clearer what this policy is trying to achieve, as it does not define <i>how</i> development should have full regard to the mentioned features. The policy could dictate which features new development must relate well to and enhance within each specific location within the character area (as this character area is subdivided into areas containing different styles/periods).</li> <li>- Suggest re-wording the policy so it states 'development proposals must...to be supported', as the current wording suggests that proposals will be supported if they have regard to the 'following design principles' regardless of any other factors, and reads as though it is guidance rather than policy.</li> <li>- There is an opportunity to state what planning use classes would be suitable within this area, and whether mixed use development would be appropriate.</li> <li>- Criteria for 'backland' development could usefully be included within this policy.</li> <li>- The policy could usefully address other issues, such as parking provision.</li> </ul>
Policy CR4: point i	Observations	<ul style="list-style-type: none"> <li>- Further clarity is required on what 'high-density' means in this context. There is an opportunity here to state the maximum heights that would be permissible within this area. High density development is appropriate, but this currently conflicts with policy CR1.</li> <li>- The policy could usefully be clarified by including the statement that 'where development is proposed within proximity of terraced properties and high-density buildings, its design should relate well to these.'</li> </ul>
Policy CR4:	Observation	It is not clear what is meant by the 'historic core'; is this the Conservation Area? It is also not clear which



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point ii		buildings are considered to have 'historic quality,' as this is subjective. If this relates to the Victorian buildings within the area it should say so.
Para. 5.14		Spelling error (exiting > existing)
Policy CR5: general comments	Observation and suggestions	<ul style="list-style-type: none"> <li>- It needs to be clearer what this policy is trying to achieve, as it does not define <i>how</i> development should have full regard to the mentioned features. The policy could dictate which features new development must relate well to and enhance within each specific location within the character area (as this character area is subdivided into areas containing different styles/periods).</li> <li>- Suggest re-wording the policy so it states 'development proposals must...to be supported' as the current wording suggests that proposals will be supported if they have regard to the 'following design principles' regardless of any other factors, and reads as though it is guidance rather than policy.</li> <li>- The policy repeats a number of the principles from CR3, including points that appear not to be appropriate (for example, whilst point v) suggests there is 'general uniformity of architectural style', most of the residential streets include a variety of different housing styles from various periods).</li> <li>- It is unclear whether some of the bullets included within the policy actually refer to specific roads/locations. If so, these should be specifically identified, as not all parts of the character area include all of the features referred to.</li> <li>- Suggest using the Character Area Assessments SPD recommendations for the East Crowthorne character area (Area D) to guide this policy.</li> </ul>
Policy CR5: points i and v	Observation	It needs to be clearer what areas these points relate to, as a defining feature of this character area is the variety of architectural styles.
Policy CR5: point ii	Observation and suggestion	Not all the localities within this character area feature large houses with large plots, but as this policy covers the whole character area it currently suggests they do. Additionally gated boundaries are not always appropriate, and in some instances boundaries consisting of vegetation are more appropriate. It would be helpful to define the part(s) of the character area this relates to.
Policy CR5: point vi	Observation	Point vi) appears to have been copied from policy CR4 incorrectly, as the junction of High Street and Duke's Ride is not located within this area.
Policy CR5, point vii	Suggestions	<ul style="list-style-type: none"> <li>- Recommend that this point is amended to state that unpaved roads should be retained, as that is reasonable in terms of their contribution to the character of the area. However, the Highway Authority will not allow unmade roads on new development.</li> </ul>

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		- Suggest defining which part of this character area is considered to have a 'rural character' as the majority of this area does not have a rural character.
Policy CR5, point viii	Observation and suggestion	As stated previously, it is inappropriate to require 'grandeur' across all new developments within this character area as this would not reflect the whole area. Define what part of the character area this relates to.
Policy CR5: point ix	Observation and suggestion	A definition of 'street trees' is required. Is the policy looking to keep 'mature street trees', or is it aiming to see further 'street trees' planted? It will not be possible to plant new 'mature street trees'
Policy CR5: points x, xi and xii	Suggestion	These issues would be better addressed in a separate landscape policy.
Policy CR5: point xii	Suggestion	Suggest removing 'particularly,' as not every view within the character area is worthy of retention, and then listing the views that are to be retained. A map could be included indicating the views that must be retained.
Policy CR6: general comments	Observation and suggestions	<ul style="list-style-type: none"> <li>- As with the other design policies, it needs to be clearer what this policy is trying to achieve, as it does not define <i>how</i> development should have full regard to the mentioned features. The policy could dictate which features new development must relate well to and enhance within each specific location within the character area (as this character area is subdivided into areas containing different styles/periods).</li> <li>- Suggest re-wording the policy so it states 'development proposals must...to be supported' as the current wording suggests that proposals will be supported if they have regard to the 'following design principles' regardless of any other factors, and reads as though it is guidance rather than policy.</li> </ul>
Policy CR6: point i	Suggestions	Some of the residential areas within this character area feature boundary treatments, so this point is only appropriate for some areas within the character area. Therefore it is recommended that the policy is amended to indicate the characteristics of each of the areas within the character area, and to require that applicants' development proposals reflect their immediate surroundings.
Policy CR6: point ii	Observation	The policy should be more specific as to the locations of 'properties with grandeur,' as this could be judged very subjectively, and it is not clear what areas within the character area this relates to.
Policy CR6: point iii	Information	Wellington College is an important heritage asset within Crowthorne, and the impact of any development upon its setting will be a material consideration in the assessment of planning applications (see previous comments regarding the impact on the significance of the asset in decision making).

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Policy/ Para. Number	Suggestion	Comment
Policy CR6: point iv	Observation	It needs to be clearer what area this point relates to as, whilst it is good to reference appropriate materials, pine cladding and fencing will not be appropriate for every part of this character area.
Policy CR7: general comments	Suggestions	<ul style="list-style-type: none"> <li>- Suggest re-wording the policy so it states 'development proposals must...to be supported' as the current wording suggests that proposals will be supported if they have regard to the 'following design principles' regardless of any other factors, and reads as though it is guidance rather than policy.</li> <li>- This policy appears to focus more on landscape features and heritage assets than 'managing design'. Landscape issues would be better addressed in a separate landscape policy.</li> <li>- This policy could consider how the Broadmoor Historic Park and Garden is to be conserved, based on saved Bracknell Forest Borough Local Plan policy EN12.</li> </ul>
Policy CR7: point i	Suggestion	<ul style="list-style-type: none"> <li>- Suggest instead stating that 'The following views out of the Broadmoor character area should not be obstructed by new development:', and then listing the views that are to be retained, as not every view within the character area is worthy of retention. A map could be included indicating the positions of the viewpoints that must be retained.</li> <li>- The policy could consider how innovative development could conserve and enhance the views within the area.</li> </ul>
Policy CR7: point ii	Information	The original Broadmoor Hospital is an important heritage asset within Crowthorne, and the impact of the development upon its setting will be a material consideration in the assessment of planning applications (see previous comments regarding the impact on the significance of the asset in decision making). See saved Bracknell Forest Borough Local Plan policy EN12.
Policy CR8	Observations and suggestions	<ul style="list-style-type: none"> <li>- Suggest re-wording the policy so it states 'development proposals must...to be supported', as the current wording suggests that proposals will be supported if they have regard to the 'following design principles' regardless of any other factors.</li> <li>- The development at TRL already has an agreed design code; as a result this design policy should not apply to the area granted planning permission in order to avoid conflict.</li> <li>- Pine cladding and fencing is not appropriate for every part of this character area.</li> <li>- Note that areas outside of the permitted site within this character area, apart from the cottages to the north, are unlikely to be developed as they are adjacent to the SPA unless non-residential development is proposed. It is not considered appropriate for new development that is not adjacent to the properties at Brookers Row to have to include similar features to these properties.</li> </ul>
Policy CR9:	Observation	<ul style="list-style-type: none"> <li>- There is an overlap with the spatial extent of this policy and CR4. These policies could be</li> </ul>

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Policy/ Para. Number	Suggestion	Comment
general comments	and suggestions	<p>merged to provide a single policy relating to the High Street area.</p> <ul style="list-style-type: none"> <li>- It is not possible for the Neighbourhood Plan to change the retail hierarchy designation of Crowthorne from a town centre to a 'District Centre'. Retail hierarchy is set out in a strategic policy (saved Policy E5 of the Bracknell Forest Borough Local Plan, 2002). As this Policy would not be in general conformity with an existing strategic policy, this would relate to a Basic Condition matter.</li> <li>- Recommend listing the types of ground floor uses that would 'contribute to the diversity of the High Street' for clarity. Planning use classes could be used (A3 (food and drink) and A4 (drinking establishments) for example).</li> <li>- Suggest the other uses that would 'complement the function of the High Street' are listed for clarity.</li> <li>- Suggest re-wording the policy so it states 'development proposals must...to be supported' as the current wording suggests that proposals will be supported if they have regard to the 'following design principles' regardless of any other factors, and reads as though it is guidance rather than policy.</li> <li>- Suggest using the Character Area Assessments SPD recommendations for the Crowthorne Centre character area (Area C) to guide this policy.</li> <li>- Policy CR10 states how the loss of retail space will be avoided; recommend this text is also included within this policy, to ensure a consistent approach between the two policies. Note however that there is a need to be specific about what a 'reasonable period of time' is, as this is very subjective otherwise.</li> </ul>
Policy CR9: point iii	Observation	<p>The architecture along Crowthorne High Street is very varied; as a result, clarity is required on what elements of the High Street are considered historic in character, as well as which materials are considered traditional. Without clarifying these issues these terms could be used very subjectively.</p>
Policy CR9: point iv	Observation	<ul style="list-style-type: none"> <li>- It is not clear why the existing shop signs are considered discrete, and there are few that use traditional lettering forms. It may not be possible to impose this on new developments/alterations apart from those within the Conservation Area.</li> <li>- Specifying who should design the lettering and signage goes beyond land-use planning matters and is therefore outside the scope of neighbourhood development plan policy.</li> </ul>
Policy CR9: point v	Observation	<p>It is not clear what is meant by 'bespoke high-quality public realm enhancements'. If they are those enhancements listed within the third paragraph it is recommended that the third paragraph is merged with this point to avoid confusion.</p>

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Policy CR9: point v and 3rd paragraph	Suggestions and information	<ul style="list-style-type: none"> <li>- Recommend removing the word 'bespoke', and instead using the phrasing '...that are considered to relate well to and enhance the High Street', as it may not be necessary to use bespoke items as there is a variety of high quality standard options on the market and it would not be reasonable to insist on bespoke items in all cases.</li> <li>- Street furniture is normally provided by developers and secured via condition rather than by section 106 or CIL. If it forms part of the adopted highway a commuted maintenance sum is paid to the Council by the developer through the highways adoption process.</li> <li>- Note that planning decisions will be made by Bracknell Forest Council rather than the Parish Council, along with the requirements in terms of street lighting.</li> <li>- A definition of 'street trees' is required.</li> </ul>
Policy CR9: point vi and 4 <sup>th</sup> paragraph	Observations and suggestions	<ul style="list-style-type: none"> <li>- Improvements to air quality are referred to. It is not clear whether the Policy relates to impacts upon human health, or vegetation and ecosystems (both are referred to in national policy). The Policy/supporting text could refer to developments in AQMAs being consistent with the Bracknell Forest Air Quality Action Plan.</li> <li>- The NPPF states that 'Development should, wherever possible, help to improve local environmental conditions such as air and water quality'. The policy wording should be amended to reflect this, as it currently appears to require all development proposals, regardless of their scale or nature, to demonstrate how air quality will be improved.</li> <li>- Proposals to encourage rear access for deliveries, where possible, are welcome as any steps to relieve congestion and improve the flow of traffic through the High Street will help to improve air quality. It would be helpful if a plan were provided to identify the rear servicing area referred to.</li> <li>- The potential noise impacts of moving deliveries to the rear should be considered.</li> </ul>
Policy CR9: 4 <sup>th</sup> paragraph	Information	Bracknell Forest Council has plans to improve the junction of Dukes Ride and High Street, and to move a number of bus stops to help movement in the area and improve capacity.
Para. 5.23	Observation	It is not possible for the Neighbourhood Plan to designate Crowthorne centre as a 'District Centre', as this is a strategic decision.
Policy CR10: general comments	Observation and suggestion	<ul style="list-style-type: none"> <li>- It is not possible for the Neighbourhood Plan to change the retail hierarchy designation of Station Parade from a 'local parade' to a 'Local Centre'. Retail hierarchy is set out in a strategic policy (saved Policy E5 of the Bracknell Forest Borough Local Plan, 2002). As this Policy would not be in general conformity with an existing strategic policy, this would relate to a Basic Condition matter.</li> </ul>

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Policy/ Para. Number	Suggestion	Comment
		<ul style="list-style-type: none"> <li>- Suggest re-wording the policy so it states ‘development proposals must...to be supported’, as the current wording suggests that proposals will be supported if they have regard to the ‘following design principles’ regardless of any other factors, and reads as though it is guidance rather than policy.</li> </ul>
Policy CR10: point iii	Observation	The architecture along Station Parade is varied with a significant number of relatively modern buildings; it is not therefore considered very accurate to describe the street as having historic character. It would therefore be unnecessary and inappropriate to require the use of traditional materials wherever practicable.
Policy CR10: point iv	Observation	<ul style="list-style-type: none"> <li>- It would not be reasonable to require traditional lettering on all new shopfronts.</li> <li>- Specifying who should design the lettering and signage goes beyond land-use planning matters and is therefore outside the scope of neighbourhood development plan policy.</li> </ul>
Policy CR10: 3 <sup>rd</sup> paragraph	Observation	<ul style="list-style-type: none"> <li>- Suggest changing ‘Proposals which result in the loss of existing shops’ to ‘Proposals which result in the loss of existing retail units’ to avoid confusion. It will not be possible to prevent permitted changes of use (such as A1 (shops and retail units) to A2 (professional and financial services)).</li> <li>- Need to be specific about what a ‘reasonable period of time’ is, as this is very subjective otherwise.</li> <li>- Need a definition of ‘community use’, as it is not clear what this specifically refers to.</li> </ul>
Para. 5.28 (page 29)	Observation	It is not possible for the Neighbourhood Plan to designate Station Parade as a ‘Local Centre’, as this is a strategic decision.
Policy CR11, general comments	Observation and suggestions	<ul style="list-style-type: none"> <li>- The Wellington Business Park is not currently a defined employment area.</li> <li>- The eastern boundary of the Broadmoor employment area indicated on the policy map does not quite follow that of the current designation on the Bracknell Forest Policies Map. This results in the policy not being in general conformity with a strategic policy. Therefore the policy does not meet the basic conditions in its current form.</li> <li>- May be worth noting in the supporting text that for the purposes of Policy CR11 employment floorspace relates to uses within Use Classes B1, B2 and B8 together with any sui generis uses that share a significant number of characteristics with those uses.</li> <li>- It is worth noting that it will not be possible for this policy to prevent changes of use that are permitted development. The Article 4 Direction that was agreed was based on existing defined employment areas in Bracknell. It does not however prevent individuals making planning applications for changes of use – it simply provides an element of control.</li> </ul>

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Para.5.28 and 5.29 (page 30) (to be changed to Para. 5.31 and 5.32)	Observations	<ul style="list-style-type: none"> <li>- Incorrect paragraph number</li> <li>- The 1<sup>st</sup> sentence of current para 5.29 refers to Wellington Business Park. However, at this point, the report is referring to existing defined employment areas i.e. not Wellington Business Park – the latter is dealt with later in the report. The proposal to designate Wellington Business Park as a defined employment area will help direct employment generating development to this area and protect and enhance the function of the area.</li> </ul>
Policy CR12: general comments	Observations and suggestion	<ul style="list-style-type: none"> <li>- The inclusion of the policy is welcomed; it will guide development to support a range of Green Infrastructure (GI) functions.</li> <li>- Whilst there is not one commonly used definition of green infrastructure, reference can be made to the Glossary within the NPPF; green infrastructure assets listed in para 17.2.5 of the Draft Bracknell Forest Local Plan; and Natural England guidance (Natural England’s Green Infrastructure Guidance (NE176), Land Use Consultants (2009), <a href="http://publications.naturalengland.org.uk/publication/35033">http://publications.naturalengland.org.uk/publication/35033</a> (see page 7)).</li> <li>- Whilst the general intention of green infrastructure connectivity is welcomed, the policy is potentially at odds with the key objective to ensure there are no significant effects on the Thames Basin Heaths SPA. One of the key issues is the effect of human activity on the protected birds of the SPA. Visitor disturbance is therefore a problem for the protected species and their habitats. If the policy intends to encourage connectivity by walking/cycling across the SPA (which it currently does through the GI designation map), then this will be fundamentally against the SPA policies in the Development Plan and accompanying guidance which is to divert visitor activity away from the SPA. If the intention of the policy is to increase visitor access to the SPA then there will need to be an Appropriate Assessment to demonstrate this principle is acceptable and in compliance with the Habitats Regulations.</li> <li>- Taking the issue raised above into account the policy may not meet the basic conditions in its current form, as the basic conditions require that ‘the making of a neighbourhood plan is not likely to have a significant effect on a European site (as defined in the Conservation of Habitats and Species Regulations 2012)’.</li> </ul>
Policy CR12: 1 <sup>st</sup> paragraph	Observations and suggestions	<ul style="list-style-type: none"> <li>- The 1<sup>st</sup> paragraph significantly limits the application of this policy to the areas indicated within the ‘Green Infrastructure Network Map’. This is an issue, as the map currently shows a very limited number of green infrastructure features, and thus misses off a number of existing features, such as Suitable Alternative Natural Greenspaces (SANGs). Additionally, the map prevents any future</li> </ul>

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		<p>improvements to the network outside the areas indicated within the map from falling within the definition for the purposes of this plan. Therefore, it is suggested that the 1<sup>st</sup> paragraph is modified to state that the green infrastructure within the Parish 'includes but is not limited to' what is indicated within the map (and include other missing green infrastructure features, such as the Broadmoor and TRL SANGs, on the map (see comment below)).</p> <ul style="list-style-type: none"> <li>- The Council has recently commissioned a green infrastructure review that provides a more comprehensive network (<a href="http://consult.bracknell-forest.gov.uk/file/4706561">http://consult.bracknell-forest.gov.uk/file/4706561</a>); this should be referenced. It is therefore also recommended that the map is updated to include both existing and potential network features and links. Below is a list of further suggestions for inclusion within the GI map: <ul style="list-style-type: none"> <li>▪ Crowthorne Ancient Tree Hunt – veteran trees across the Parish</li> <li>▪ Tree Preservation Order trees and areas</li> <li>▪ Environment Agency detailed river network, flood risk and surface water flooding</li> </ul> </li> </ul> <p>Bracknell Forest Council can assist with the updating of the Green Infrastructure map.</p>
Policy CR12, 2 <sup>nd</sup> paragraph	Observation, suggestion and information	<ul style="list-style-type: none"> <li>- Mentions 'assets of biodiversity value', which needs to be explained in the text or defined in a glossary.</li> <li>- Further limits the application of the policy. For example, the definition excludes other areas of urban green space and all water based parts of the network ('blue infrastructure'). Note that it is unusual to include school facilities within the definition of green infrastructure; is it intended to include all school facilities within the definition, or only the grounds of Wellington College?</li> <li>- Bracknell Forest Council will continue to work with all Parish Councils to ensure there is a co-ordinated approach as to how we deliver sustainable transport improvements through joint CIL funding.</li> </ul>
Policy CR12, 3 <sup>rd</sup> paragraph	Observations and suggestions	<ul style="list-style-type: none"> <li>- Spelling error between 'maintenance' and 'improvement' within 3<sup>rd</sup> paragraph: an &gt; and.</li> <li>- States that development should 'enhance the visual characteristics and biodiversity'. This does not recognise the full range of functions that green infrastructure provides. The policy could usefully be revised to reference the multi-functional nature of green infrastructure and list specific aspects of this in the explanation below.</li> <li>- In addition, the text 'broad location of the network' within the last paragraph conflicts with para. 5.32, which uses the phrase 'lie within or adjoining the network'. Suggest using the latter as it is less subjective.</li> <li>- Further clarity is required on which elements of the network are to be 'enhanced' and which are</li> </ul>



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Policy/ Para. Number	Suggestion	Comment
		<p>to benefit from 'maintenance and improvement'. Further, there is potential conflict with para 5.32 where development proposals 'do not harm' and 'where possible' improve the network.</p> <ul style="list-style-type: none"> <li>- Further clarity is also required on how development proposals should respond to the policy. Consider referring to the functions provided by green infrastructure from para. 17.2.3 of the Draft BFLP: <ul style="list-style-type: none"> <li>▪ access and recreation;</li> <li>▪ increasing habitat connectivity through ecological networks of corridors and stepping stones for wildlife to move through the landscape;</li> <li>▪ connecting urban and rural areas;</li> <li>▪ landscape and visual amenity benefits;</li> <li>▪ providing cooling and shading in urban areas;</li> <li>▪ surface water retention and management; and,</li> <li>▪ carbon capture and storage, providing mitigation for climate change.</li> </ul> </li> </ul>
<p>Para. 5.30 (page 31) (to be changed to Para. 5.33)</p>	<p>Observation and suggestions</p>	<ul style="list-style-type: none"> <li>- Incorrect paragraph number.</li> <li>- Recommend changing 'dependence of cars' to 'over-dependence on cars' to highlight problem.</li> <li>- See comments relating to map: Policy CR12: Green Infrastructure, 1<sup>st</sup> para.</li> <li>- Change 'creation' to 'maintenance', as the policy is not currently seeking to create new green infrastructure; rather it is intending to protect, improve and maintain the existing network.</li> </ul>
<p>1<sup>st</sup> Para. 5.31 (page 31) (to be changed to Para. 5.34)</p>	<p>Observation and suggestion</p>	<ul style="list-style-type: none"> <li>- Incorrect paragraph number, change to 5.34. Following paragraph also currently numbered 5.31.</li> <li>- Explains the importance of 'maintaining existing habitats and wildlife corridors in residential areas'. These features are not shown in the current GI map and it should be revised to include them.</li> </ul>
<p>Policy CR13: general comments</p>	<p>Observation</p>	<ul style="list-style-type: none"> <li>- The inclusion of the policy is welcomed; it will guide development to support the biodiversity of the Parish.</li> <li>- The term "Development proposals" in the second paragraph is too general, as the definition of development covers such a wide range of proposals such as advertisement consent, changes of use etc; it is therefore suggested that the policy refers to 'Relevant development proposals'.</li> </ul>
<p>Policy CR13: 1<sup>st</sup> paragraph</p>	<p>Observation and suggestions</p>	<ul style="list-style-type: none"> <li>- Change 'especially' to 'including'.</li> <li>- Suggest changing 'Local Nature Reserve' to 'Local Wildlife Site (LWS)'. This is recommended as Edgbarrow Woods is a LWS, and there are other LWS sites within the Parish, including Butter Hill which would benefit from a higher level of protection.</li> </ul>

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Policy/ Para. Number	Suggestion	Comment
		<ul style="list-style-type: none"> <li>- The issue of protecting biodiversity at key nationally (SSSI) and internationally (SPA) designated sites is secured in the Development Plan and ensures, for example, that there is no harm to the integrity of the Thames Basin Heaths SPA. Therefore it is not known why this element of the policy is necessary or meets the basic conditions.</li> </ul>
Policy CR13: 2 <sup>nd</sup> paragraph	Suggestion	The policy makes reference to 'local biodiversity assets' which should be defined in the plan or the explanatory text. These assets should include nationally recognised habitats and protected species as well as those identified in the Bracknell Forest Biodiversity Action Plan. In defining this term, the neighbourhood plan also has the opportunity to identify what biodiversity is specific to Crowthorne.
Policy CR13: 3 <sup>rd</sup> paragraph	Observations and suggestions	<ul style="list-style-type: none"> <li>- The net gain principle is supported, along with provision of the net gain on site, or locally.</li> <li>- In practice (and given the small size of the Parish) using the term 'for the Parish' may limit enhancement opportunities and the ability to deliver projects. It may also cause issues elsewhere in the Borough, with development proposals outside of Crowthorne Parish potentially needing to provide net gain within Crowthorne. Defra is currently consulting on biodiversity net gain, so further guidance in this area is anticipated. Consideration should be given to refining the wording used to prioritise net gain on site, in the Parish, in close proximity to the Parish etc.</li> <li>- Recommend defining biodiversity net gain within the text or a glossary.</li> <li>- Need to define what development will be required to demonstrate biodiversity net gain, as this will not always be appropriate (for example, it will not be required when there are changes to signage)</li> <li>- Referring to the requirement for net gain within the NPPF (para. 170) may add further weight to this policy.</li> </ul>
Para. 5.36 (page 32) (to be changed to Para. 5.40)	Observation and suggestion	Describes protected species but uses examples of very common species that are not particular to Crowthorne. Examples that reflect the important biodiversity of the area might be those that inhabit the heathland and conifer plantations such as Adder ( <i>Vipera berus</i> ) and Nightjar ( <i>Caprimulgus europaeus</i> ).
Para. 6.2	Suggestion	Need to amend the section that states 'The Parish Council will use ... to determine its planning application decisions', as the Parish Council can create policies using the Neighbourhood Plan, and comment on applications as a statutory consultee. It should be made clear that the Parish Council's decisions are restricted to what recommendation it makes to the local planning authority which is responsible for determining applications.
Para. 6.4	Information	<ul style="list-style-type: none"> <li>- Bracknell Forest Council will continue to work with all Parish Councils to ensure there is a co-</li> </ul>

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Policy/ Para. Number	Suggestion	Comment
	and suggestion	<p>ordinated approach as to how we deliver sustainable transport improvements through joint CIL funding.</p> <ul style="list-style-type: none"> <li>- The 'project initiatives' will be fundable by CIL but not by Section 106 funding.</li> <li>- Bracknell Forest Council has plans to improve the junction of Dukes Ride and High Street, and to move a number of bus stops to help movement in the area and improve capacity.</li> <li>- May need to mention the fact cycle routes will not be able to go through the SPA for the reasons mentioned in previous comments.</li> <li>- A definition of 'street trees' is required. Need to clarify where the replanting would occur.</li> </ul>
Policy Map Inset	Observation and suggestions	Area colours are good, but change line colours so they are easier to tell apart. Cannot clearly see the boundaries indicating the areas policy CR11 impacts.
Green Infrastructure Network Map	Observation and suggestions	<ul style="list-style-type: none"> <li>- Some areas of existing green infrastructure are omitted from the map, including the SANGs (Buckler's Forest and Cricket Field Grove; BFC can provide the GIS layer for these); any smaller areas of 'existing habitats and wildlife corridors in residential areas' (referred to in para 5.31); and a small part of the SPA.</li> <li>- It would be beneficial to show elements of green infrastructure as they extend outside the Parish boundary, given the 'network' nature of green infrastructure.</li> <li>- Given the potential for recreational impact on the SPA, this area should be shown differently on the map as increased connectivity into this area is not promoted.</li> <li>- Spelling error (Traffic-free Cycle Route / Subway).</li> <li>- Consider changing some of the colours so they are easier to tell apart.</li> <li>- Also consider changing the scale of the map to make it easier to use.</li> <li>- Add a footnote indicating where the plan is from.</li> </ul>
Appendix A	Information	<p>Follow this link to view the buildings that have been approved for local listing, following a key Executive decision on the 12<sup>th</sup> February 2019: <a href="http://democratic.bracknell-forest.gov.uk/documents/s130425/Nominations%20Recommended%2022.1.19.pdf">http://democratic.bracknell-forest.gov.uk/documents/s130425/Nominations%20Recommended%2022.1.19.pdf</a></p> <p>The following were not recommended for inclusion on the list</p> <p>Lovick Cottage Crowthorne C of E School Wildmoor Heath Primary School</p>

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Policy/ Para. Number	Suggestion	Comment
		<p>Church Street , Crowthorne</p> <p>The Parish Council will have the opportunity to present new buildings for inclusion on the BFC list once the initial list is in place. Any buildings or structures identified in the NP that are not on the BFC list will have less weight attached in decision making.</p>
Appendix C	Suggestions	<ul style="list-style-type: none"> <li>- The document should make reference to the saved Bracknell Forest Borough Local Plan policy EN20, as this is a key design-focused planning tool used by Bracknell Forest Council.</li> <li>- Page 8 of the document should reference the Character Area Assessments SPD.</li> <li>- Ensure photographs used within the document are representative of the predominant character of the character area they are depicting. For example, the first photo on page 17 is not typical of the Edgcumbe Park estate.</li> </ul>