

TO: THE EXECUTIVE
17 JULY 2018

BRACKNELL FOREST LOCAL PLAN
CONSULTATION ON NEW SITES
Director of Environment, Culture and Communities

1 PURPOSE OF DECISION

- 1.1 Consultation on the Draft Bracknell Forest Local Plan (BFLP) took place between 8 February and 26 March 2018. As a result of this process a number of new sites were put forward for consideration for future development by developers/land owners. These sites need to be assessed in the same way as sites that were submitted earlier in the process.
- 1.2 Two of the sites (Hewlett Packard, Cain Road, Binfield and Land at 3M, Cain Road, Binfield) involve previously developed land within a defined employment area in the settlement. Initial assessments indicate that they are the type of site that the Government is encouraging local planning authorities to prioritise for residential development. However, due to the submission of these sites at this stage, they have not been subject to full public consultation. This report seeks approval of the principle of carrying out a focused consultation on these new sites for a three week period in September 2018.

2 RECOMMENDATION(S)

2.1 It is recommended that:

- (i) the principle of public consultation on Land at Hewlett Packard, Cain Road, Binfield and Land at 3M, Cain Road, Binfield (see Appendix A) for a period of three weeks in September 2018 is agreed; and,**
- (ii) the format and content of material produced for the consultation be approved by the Chief Officer: Planning, Transport and Countryside in consultation with the Executive Member for Planning and Transport.**

3 REASONS FOR RECOMMENDATIONS

- 3.1 The Regulations¹ require that a local plan is prepared in consultation with the local community and other stakeholders. The proposed consultation will facilitate engagement and comments received will help inform sites included in the Submission BFLP.
- 3.2 It is important that the Submission BFLP is based on robust evidence and takes account of emerging national policy, in order to be found 'sound'.

4 ALTERNATIVE OPTIONS CONSIDERED

¹ Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012

- 4.1 The option of not consulting on the new sites would leave the Council vulnerable at examination stage when stakeholders have the opportunity to pursue concerns that they have about which sites have been included with an independent inspector whose role is to assess a plan.

5 SUPPORTING INFORMATION

Background

- 5.1 As part of its initial evidence gathering for the BFLP, the Council undertook various 'Calls for Sites' in 2016. The results of this exercise and subsequent analysis were included in the Strategic Housing and Economic Land Availability Assessment (SHELAA). The SHELAA considered the implications of existing evidence, and helped identify which potential development sites were worthy of detailed assessment. Specialist studies were then undertaken and the results, together with requirements for open space, Suitable Alternative Natural Greenspace (SANG), infrastructure and the outcomes of the Issues and Options consultation held in 2016, were used to inform the site selection process. The Sustainability Appraisal (SA) was also critical to the process of deciding which sites should be included in Draft BFLP.

New sites

- 5.2 Following consultation on the Draft BFLP between 8 February and 26 March 2018, responses received have been processed, collated and summarised. Seven new sites have been submitted for consideration. These are summarised in the table below.

Table 1: New sites submitted for consideration

| Site address | Land type | Current policy designations | Promoted use | Estimate of capacity ² |
|---|---------------------------|--|------------------|-----------------------------------|
| Recreational land at 3M, Cain Road, Binfield | Previously developed land | Within settlement Defined employment area Within 5km of SPA | Residential (C3) | 28 |
| Hewlett Packard (main site and recreational land) Cain Road, Binfield | Previously developed land | Within settlement Main site is within defined employment area Recreational land forms part of land allocated at Amen Corner South Within 5km of SPA | Residential (C3) | 300 |

² Using the SHELAA methodology

| | | | | |
|--|---------------------------|-----------------------------------|------------------------------------|-----|
| Pinecroft, Old Wokingham Road, Bracknell | Previously developed land | Countryside Within 5km of SPA | Residential (C3) or Care Home (C2) | TBC |
| Eagle House Field, Crowthorne Road, Sandhurst | Greenfield | Countryside Within 400m of SPA | Care Home (C2) | TBC |
| Land north of Honeysuckle Cottage and Tile House, Tilehurst Lane, Binfield | Greenfield | Countryside | Residential (C3) | TBC |
| Land at Steeple View, Gibbins Lane, Warfield | Greenfield | Countryside Within 5km of SPA | Residential (C3) | TBC |
| Land to the south west of Binfield and north west of Amen Corner North, Binfield | | | Residential (C3) | TBC |

5.3 From an initial assessment it is apparent to officers that two of the new sites being promoted have potential for allocation in accordance with the approved selection methodology. For comparative purposes, it is important that these two sites are assessed in the same way as other sites that have already been through the process. It is already clear that further site specific technical advice will be needed. Consequently, the consultants that have carried out previous studies have been approached and commissioned to look at certain issues in further detail. Officers will also need to look at infrastructure requirements and update the SA to cover these sites.

5.4 A further major site at, Jealotts Hill, has also been promoted through the Local Plan consultation process as a potential strategic business and housing allocation which lies within the Green Belt. This submission is currently being assessed and if considered suitable for allocation will require a separate public consultation later in the year.

Other factors requiring consideration

5.5 At the beginning of March, the Government published its revised Draft National Planning Policy Framework (NPPF), along with accompanying Draft Planning Practice Guidance (PPG) and a Housing Delivery Test 'Draft Measurement Rule Book'. Consultation on the documents closed in May and the Government has indicated that the final version of the NPPF will be published prior to the Summer Recess on 24th July.

5.6 The Draft NPPF signals likely changes that will need to be taken account of in the Submission BFLP in order to ensure consistency with national policy. Points relevant to this matter are:

- The need for strategic policies to look ahead over a minimum of 15 years from adoption. This means that the plan period for the BFLP would need to be extended by at least another year with the consequent implications for development needs (i.e. to 2034/35 instead of 2033/34).
- The need to use the standard method for the calculation of local housing need and latest data at time of submission. Whilst the Draft BFLP uses the formulaic approach, the data used will need to be updated prior to the publication of the submission version. Whilst new affordability data has already been published (April 2018), the 2016 based household projections that are expected to be published in September 2018.
- Give substantial weight to the value of using suitable brownfield land within settlements.

5.7 In calculating the number of homes that needed to be accommodated on further sites, a baseline of 31st March 2017 was used in the Draft BFLP. Since then, further monitoring work has been completed and the position can be updated to 31st March 2018. However, at this stage, the overall position has to be based on the target used in the Draft BFLP (670 dwellings per annum (C3 use)) with the plan period extending to 2034/35. The table below provides a summary of the position.

Table 2: Housing land supply in Bracknell Forest at 31st March 2018

| | |
|--|---|
| 853 | Homes completed between 2016/17 and 2017/18 |
| Plus 4,403 | Homes with planning permission (large and medium sites) |
| Plus 3,880 | Large and medium sites already allocated, but without permission (2,465) and homes approved subject to legal agreements (1,415) |
| Plus 934 | Small sites windfall allowance of 14 homes per year for the period 2018/19 to 2034/35 i.e. 17yrs = 238 homes Medium sites windfall allowance of 48 homes per year for the period 2021/22 to 2034/35 = 14 years = 672 and 24 homes per year for 2020/21 = 696 homes |
| =10,070 | |
| What we still need to do for the period 2016/17 – 2034/35 | |
| 12,730 | Requirement over total plan period: Using indicative Objective Assessment of Need for housing (670 x 19 = 12,730) |
| In summary | |
| New homes needed 2016/17 to 2034/35 | 12,730 |
| Homes we have already found sites for (including windfall allowance) | 10,070 |
| Amount outstanding assuming all above | = 2,660 |

| | |
|--|---------------------|
| come forward (minimum figure) | |
| Flexibility allowance | 10% = 266 dwellings |
| Total to find | 2,926 |

- 5.8 Table 2 shows that at 31st March 2018, sites were required for at least 2,926 dwellings. The Draft BFLP proposes to allocate sites for 3,651 dwellings (draft Policy LP3). However, some of the sites included within this figure are now commitments and are therefore counted elsewhere. If these are discounted, the remaining sites already proposed for allocation are estimated to have an approximate capacity of 3,466 dwellings.
- 5.9 Whilst these figures suggest that the Council is already proposing to allocate sufficient land, they do not take account of the fact that estimates of capacity are likely to be amended in some cases due to the receipt of further technical evidence and responses received to the recent consultation. Furthermore, as highlighted in para. 5.5, the final local housing need figure is not currently known.
- 5.10 Due to the uncertainties listed above, it is possible that further sites will be needed. The figures given also represent the minimum number of dwellings required. In order to provide flexibility it is suggested that a further consultation on two additional sites takes place prior to the council agreeing a submission Local Plan.

Further consultation

- 5.11 A high level assessment of the new sites suggests that Land at Hewlett Packard, Cain Road, Binfield and Land at 3M, Cain Road, Binfield represent the type of site that the Government is encouraging local planning authorities to allocate for housing. Section 11 of the Draft NPPF deals with 'Making effective use of land' and makes it clear that the use of previously developed land should be maximised, particularly within settlements. Opportunities to remediate contaminated land are also highlighted (part of the Hewlett Packard site is a former landfill site). Para. 120 of the Draft NPPF also refers to the need to review allocations in development plans and consider whether or not there is a need to reallocate the land for a more deliverable use that can help meet identified needs. This is particularly important, as both sites referred to are located in a defined employment area which is also covered by an Article 4 Direction which restricts permitted development rights for the change of use from offices to residential.
- 5.12 Whilst it is possible to propose new sites for allocation in a submission version of a local plan, which is then published for consultation, the form of consultation is restricted at this stage. Any objections/comments must be based on one of the 'tests of soundness' as set down by legislation. They are whether the plan is:
- Positively prepared
 - Justified
 - Consistent with national policy.
- 5.13 Furthermore, all representations received are not subsequently considered by officers or the Council, but instead by an independent Inspector through the examination process.

Impact on overall timetable

- 5.14 If a more open form of public consultation is deemed appropriate, it is suggested that a focused consultation is planned for the first three weeks of September 2018, after the holiday period. The current LDS (agreed earlier this year) refers to the publication of a Submission BFLP in October/November 2018, with submission of the BFLP to Government in February 2019. The timetable is therefore challenging, particularly if a further consultation is to take place in September. However, much will depend on the level of response received, as all comments would need to be analysed and taken into account in preparing the final version of the Submission BFLP.

Suggested Consultation Strategy

- 5.15 Public consultation could be carried out for a three week period starting on Monday 3rd September and ending on Friday 21st September 2018. It is suggested that a manned exhibition is held in Binfield, due to the location of the sites. At this stage, it is not possible to provide full details of the content of the documents that would be produced, but this would follow the format of the site profiles included in the Housing Background Paper that was compiled for the Draft BFLP consultation.

- 5.16 The consultation would also involve the following:

- Notification to all those on the existing Planning Policy database;
- Making documents/maps available on:
 - i) the Council's website and consultation portal,
 - ii) at the Time Square offices and at Town /Parish Council offices;
- Distributing information by way of, a press release, alerts on social media;
- A manned exhibition in Binfield, (as the area most affected by sites), location and times to be agreed with Ward members;
- Sending out consultation information via 'Involve' (which is a central support agency for local voluntary and community action groups within the Borough). This also includes the Council's Access Group.

6 ADVICE RECEIVED FROM STATUTORY AND OTHER OFFICERS

Borough Solicitor

- 6.1 Consultation on the Local Plan is required by the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The provisions relating to the consultation are covered by Regulation 18 and it is considered that undertaking the consultation as proposed will help fulfil the Council's obligations under this legislation.

Borough Treasurer

- 6.2 The costs of developing the Local Plan, including the consultation and any staffing requirements, will be met through existing Planning Policy budgets.

Equalities Impact Assessment

- 6.3 An Equalities Impact Screening Record Form is attached as Appendix B

Strategic Risk Management Issues

- 6.4 The Strategic Risk Register (2015) includes Risk 10 which identifies the risk of not working effectively with key partners or residents in the development of services.

Such a risk could mean that community needs are not met and a negative impact on community cohesion. The production of an up-to-date local plan involves extensive engagement with stakeholders and residents in order to identify local needs. Risk 11 identifies the risk of being unable to implement legislative changes. The production of a new local plan allows legislative changes to be reflected within the local plan.

7 CONSULTATION

- 7.1 The preparation of the new BFLP has already involved consultation on some evidence base studies, an Issues and Options consultation and consultation on the Draft BFLP. The further consultation suggested in this report would fall under the scope of Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Appendices

Appendix A Key maps showing the location of new sites

Appendix B Equalities Impact Screening Record Form

Background Papers

Draft Bracknell Forest Local Plan (February 2018)

Housing Background Paper (February 2018)

Statement of Community Involvement (February 2014)

Local Development Scheme 2016 – 2019 (June 2016)

National Planning Policy Framework: draft text for consultation (March 2018)

Contact for further information

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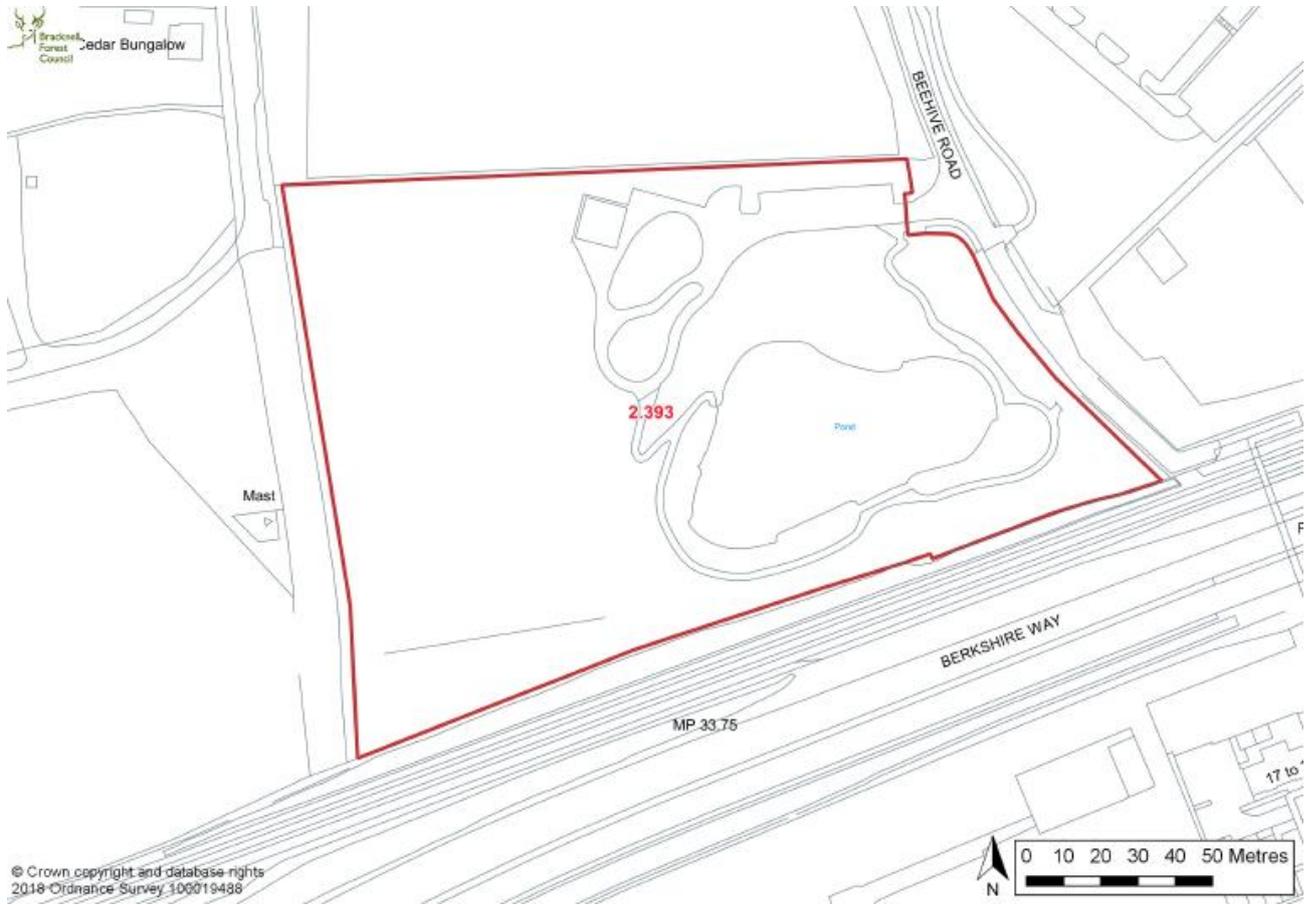
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APPENDIX A

| | | | |
|-----------------|----------|---------------------|---|
| Site Ref | BIN16 | Site Address | 3M Land between Cain Road/Turnpike Road |
| Parish | Binfield | Ward | Binfield with Warfield |



| | | | |
|-----------------|----------|---------------------|------------------------------------|
| Site Ref | BIN18 | Site Address | HP Recreational Land, Beehive Road |
| Parish | Binfield | Ward | Binfield with Warfield |



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|-----------------|----------|---------------------|-------------------------------|
| Site Ref | BIN19 | Site Address | HP (Main Building), Cain Road |
| Parish | Binfield | Ward | Binfield with Warfield |

