



Bracknell Forest Local Plan
(Pre-Submission/Regulation 19 Publication)

Interim Consultation Statement

Version for Executive/Council
March 2021

This document supports the Pre-Submission Bracknell Forest Local Plan and provides information relating to previous consultations.

The document is not on deposit for consultation and is background evidence.

Any queries regarding the document should be sent to:

Email: development.plan@bracknell-forest.gov.uk

Website: <https://www.bracknell-forest.gov.uk/planning-and-building-control/planning/planning-policy/development-plan/draft-bracknell-forest-local-plan/background>

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1. Introduction

1.1. This Interim Consultation Statement sets out how the Council undertaken community participation and stakeholder involvement in the production of the emerging Local Plan the main issues raised during consultations have shaped the Pre-Submission Bracknell Forest Local Plan (BFLP). This is required by Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) (the Local Planning Regulations).

1.2. In accordance with Regulation 19 of the Local Planning Regulations, this Statement sets out:

- i. which bodies and persons were invited to make representations under regulation 18,*
- ii. how those bodies and persons were invited to make such representations,*
- iii. a summary of the main issues raised by those representations, and*
- iv. how those main issues have been addressed in the local plan.*

1.3. Consultations have undertaken in the context of the National Planning Policy Framework (NPPF) has ensured the Plan has been:

'shaped by early, proportionate and effective engagement between planmakers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees.' (Paragraph 16a)

1.4. In addition, this Statement highlights how the Council has met the requirements of the Statement of Community Involvement (SCI) ¹.

1.5. This Statement will be updated to include the representations made in response to the Pre-Submission consultation (Regulation 19) to form the final Consultation Statement submitted to the Secretary of State as part of the documents required under Regulation 22.

¹ SCI: <https://www.bracknell-forest.gov.uk/planning-and-building-control/planning/planning-policy/about-planning-policy>

2. Conformity with the Statement of Community Involvement

- 2.1. The SCI guides the approach to consultation stages throughout the preparation of the BFLP. It sets out how the community should be engaged in the Local Plan process and at what stages that involvement should take place. The SCI was first published in 2006. Subsequently it has been updated to take account of new Regulations and policy guidance with the current version was adopted in 2014. The COVID-19 pandemic has resulted in the Council being unable to fulfil some of the commitments set out in the SCI. As a result, in August 2020, the SCI temporary changes addendum² was published, outlining how the Council will engage with the community in planning policy, how to respond to planning policy consultations and publicity for planning applications during this period.
- 2.2. The vision for the SCI is 'to give all people the opportunity to be engaged in the local planning process which shapes the environment of Bracknell Forest Borough'. The SCI seeks to ensure the active, meaningful and continued involvement of local communities and stakeholders in the planning process.
- 2.3. For the preparation of a Local Plan the SCI identifies the statutory requirements that must happen as part of any public consultation which includes consultation with:
 - Duty to cooperate bodies (see SCI Appendix 2);
 - Specific statutory bodies, some of which overlap with the duty to cooperate bodies (see SCI Appendix 3), and;
 - General consultation bodies which are voluntary organisations representing certain groups (see SCI para 3.1.0).
- 2.4. In addition, the SCI requires engagement with the local community which is proportionate to the nature of the document being prepared.
- 2.5. The Council maintains a database of these specific and general consultation bodies together with local organisations and members of the local community that have expressed an interest in being consulted on or being kept informed of the development of planning policy. This database is live and continuously updated. There are currently just over 4,500 individuals/organisations on the database.
- 2.6. The methods of communication used to those on the consultation database is via email and post, depending on the individual/organisation/business preferred contact method. There are also other varied methods of communication to be as inclusive as possible which are detailed under each of the consultation stages.

² Statement of Community Involvement temporary changes addendum: <https://www.bracknell-forest.gov.uk/planning-and-building-control/planning/planning-policy/about-planning-policy/statement-community-involvement-temporary-changes-addendum>

3. Consultation Overview

3.1. A number of Regulation 18 consultations have been undertaken, each of which has given residents and stakeholders opportunities to influence the BFLP prior to submission:

- i. Scope of the BFLP – consultation from 21st October to 2nd December 2015.
- ii. Issues and Options - consultation from 13th June to 25th July 2016.
- iii. Draft BFLP - consultation from 8th February to 26th March 2018.
- iv. Draft BFLP Further Consultation on New Sites – consultation from 3rd to 24th September 2018.
- v. Draft BFLP Revised Growth Strategy – consultation from 25th October to 6th December 2019.

3.2. Following the Regulation 18 consultations, the consultation on the Regulation 19 Pre-Submission BFLP, is taking place between 23rd March 2021 and 11th May 2021.

4. Scope of the Comprehensive Bracknell Forest Local Plan Consultation (October - December 2015)

4.1. A consultation on the scope of the Draft BFLP was held for 6 weeks from 21st October to 2nd December 2015. In accordance with Regulation 18 of the Local Planning Regulations, this consultation notified various bodies and stakeholders that Council was preparing a Plan and invited them to make comments on what it should contain. The consultation was carried out in accordance with the SCI.

4.2. Who was consulted?

4.3. Consultees on the planning policy consultation database were made aware of the consultation by email or letter. This included the following:

- Statutory bodies and organisations
- Utility providers
- Service providers
- Planning agents
- Developers
- Land owners
- General public
- Relevant local interest bodies and organisations
- Bracknell Forest Town and Parish Councils
- Local Councillors

4.4. How were they consulted?

4.5. The consultation was publicised on the Council's website and approximately 4,400 letters and emails were sent out informing stakeholders of the Council's intention to prepare a Local Plan and the policy topics to be covered.

4.6. What were the main issues and how have they been taken into account?

4.7. In total 24 consultees responded. Comments were not received on all suggested policy topics. The majority of responses were concerned with detailed matters that it is intended to cover under the proposed policy topics. For example, 'the natural environment and biodiversity including landscape, green infrastructure and the Thames Basin Heaths Special Protection Area' topic generated a number of detailed comments on policy content including suggested policy wording. The 'housing needs' policy topic also generated a number of comments on the type of housing which should be provided, for example, the encouragement of all types of low cost housing and the need for specialist accommodation.

4.8. Concerns were raised by a number of consultees that the topic of 'infrastructure needs, including open space, sport and recreation and community facilities' policy topic might not cover road and transport infrastructure or healthcare. These matters will be covered although it was not explicitly mentioned under the general policy topic heading.

- 4.9. Other comments were received which were not directly related to the scope but were concerned with broader issues including the process of producing the Plan.
- 4.10. Some concern was raised that local people were not aware of the documents and that more detail was needed, however the consultation was on the scope only and no documents were produced. On the whole, consultees supported the scope of the BFLP.
- 4.11. A detailed summary of responses to the scope consultation can be viewed on the Council's website³.

³ Consultation on Scope of Comprehensive Local Plan - Summary of Responses: <https://www.bracknell-forest.gov.uk/planning-and-building-control/planning/planning-policy/development-plan/draft-bracknell-forest-local-plan/draft-bracknell-forest-local-plan>

5. Issues and Options Consultation (June-July 2016)

- 5.1. The Issues and Options consultation did not include proposed allocations for specific uses but included options for the location of development and suggested wording/criteria for Development Management policies. The consultation was based on a series of questions set out in a questionnaire, which had short and extended versions. The consultation documents are available to view on the Council's website⁴.
- 5.2. The consultation was carried out in accordance with the SCI and a consultation strategy⁵ was prepared. A statement setting out the consultation process, summary of responses and consultation material is available on the Council's website⁶.
- 5.3. The BFLP Issues and Options consultation ran from Monday 13th June to Monday 25th July 2016.

5.4. Who was consulted?

- 5.5. A large number of local residents and stakeholders, including statutory consultees were consulted including:
- Those living and working within the Borough;
 - Parish/Town Councils within the Borough;
 - Adjoining County, District and Borough Councils;
 - Specific consultees (such 'duty to co-operate' bodies and specific consultees, including Environment Agency, Natural England, Highways Agency and Historic England); and,
 - General consultees (including voluntary bodies, bodies which represent the interests of different racial, ethnic or national groups, different religious groups, disabled persons, and persons carrying on a business in the Local Authority area).

5.6. How were they consulted?

- 5.1. A number of methods were used to consult on the Issues and Options in order to ensure inclusive consultation as follows:

Method	Description
Make documents and supporting information available at Council offices and public libraries for inspection	Hard copies of the main consultation document and supporting documentation (including non-technical leaflet in plain English) was also made available at the Council's Time Square office.
	Hard copies of the main consultation document and leaflets were deposited in local

⁴ Issues and Options Consultation documents: <https://www.bracknell-forest.gov.uk/planning-and-building-control/planning/planning-policy/development-plan/draft-bracknell-forest-local-plan/draft-bracknell-forest-local-plan>

⁵ Consultation Strategy – See Comprehensive Local Plan Issues and Options See Appendix 1 : https://consult.bracknell-forest.gov.uk/portal/planning/clp_issues_options

⁶ Comprehensive Local Plan I & O Summary of Responses and Consultation Statement: <https://www.bracknell-forest.gov.uk/planning-and-building-control/planning/planning-policy/development-plan/draft-bracknell-forest-local-plan/draft-bracknell-forest-local-plan>

Method	Description
	libraries (computer access, and thus access to the consultation portal (Objective), was also available at local libraries).
Make documents, supporting information and electronic methods of responding available on the Council's website	<p>An online consultation event with the documents being consulted on and an online response form could be accessed using the online 'have your say' consultation portal (Objective). Those who were on the Planning Policy consultation portal database at the time, who had asked to be kept updated, were sent a notification informing them of the consultation and explaining how they could respond.</p> <p>The home page of the Council's website (including 'Consultations' page) and the Local Plan web page were used to advertise the consultation and a direct link was provided to the consultation event.</p>
Information in the Council's newsletter (Town and Country)	An article was placed in the Council's March 2016 edition of the newsletter 'Town and Country'. This is circulated to residents in the Borough. The article aimed to alert residents of the consultation and explained how to register their comments.
Press releases to local newspapers	<p>A press release was sent to local newspapers/radio stations at the start of the consultation.</p> <p>A press advert was placed in a local newspaper (Bracknell News).</p>
Social media	Information was posted on the Council's social media accounts (Facebook and Twitter) throughout the consultation period.
Distribute information to Town and Parish Councils	<p>A meeting was held with Parish and Town Councils prior to the start of the consultation to advise of the nature of the consultation.</p> <p>Parish/Town Councils were formally notified and provided with hard copies of the consultation document and supporting documentation.</p>
Stakeholder groups	<p>Consultation with local business interest via the Council's Business Enterprise team.</p> <p>Consultation with local voluntary and community groups via 'Involve' (a central</p>

Method	Description
	support agency for over 600 voluntary and community action groups). Consultation with the Council's Access Group.
Letters and e-mails to contacts on address database	An email or a letter (sent to those without email addresses) was sent to consultees explaining the nature of the consultation and where information was available.
Other	A strap line was inserted into emails sent by staff in the Planning Section to advertise the consultation. An article was placed on the Council's intranet (Boris/Doris), under staff news, to help raise awareness amongst officers.

5.2. What were the main issues and how have they been taken into account?

5.3. A total of 83 groups, organisations or individuals commented on the Issues and Options consultation with a total of 1,324 responses. A summary of the issues raised during this consultation and how they have been taken into account within the next version of the BFLP are in Table 1 below. A detailed summary of responses to the Issues and Options consultation can be viewed on the Council's website.⁷

⁷Comprehensive Local Plan I & O Summary of Responses and Consultation Statement: <https://www.bracknell-forest.gov.uk/planning-and-building-control/planning/planning-policy/development-plan/draft-bracknell-forest-local-plan/draft-bracknell-forest-local-plan>

Table 1: Issues and Options (2016) Consultation- Summary of Main Issues

Issues and Options (2016)	
Main Issues Raised	Council's Response
Question 1: Do you agree with this view of how the Borough should develop up to 2036? If not, how would you amend the emerging 'Vision'?	
Generally supportive however a number of comments were concerned with specific issues such as the provision of affordable housing, open space, priority to development brownfield land that do not relate to the vision.	Matters addressed by other policies in the BFLP.
Additional wording suggested to strengthen reference to the historic environment, need to provide infrastructure improvements in a timely manner and the preserving forested character.	Vision amended to refer to heritage assets and providing infrastructure in a timely manner.
Question 2: A. Do you agree with these objectives? If not, please say how they could be changed. B. Do you think additional objectives are required to deliver the emerging 'Vision'?	
Generally supportive however a number of comments were concerned with specific policy considerations such site selection process, allocations minimising flooding and transport system.	No changes required as matters addressed by policies in the BFLP.
Objective B should be amended so it clearly references that the water environment and areas of ecological value will be protected and enhanced and the need to conserve and, where possible, enhance the historic environment.	Objective B amended to refer protecting the water environment and the quality of life. However, objective B includes reference to heritage assets, therefore it is considered that this point is already adequately addressed.
Objective D should refer to flood risk.	Objective amended to refer to flood risk.

Issues and Options (2016)	
Main Issues Raised	Council's Response
Objective I should be expanded to include the protection and enhancement of existing infrastructure, including green and flood infrastructure.	Objective amended to refer to green and blue infrastructure.
It was considered an additional objective concerning climate change is required.	Climate change is referred to in Objective D, therefore it is not necessary to have a specific objective relating to this. However, Objective amended to refer to flood risk.
Question 3: Do you agree with the suggested policy approach to specialist housing? If not, please specify why.	
Considered that specific sites should not be allocated as specialist housing should be integrated in the community or should only be sought on larger sites if likely to be delivered.	Each site will be assessed having regard to location and ability to deliver.
A comment was made that specialist housing should contribute to, and not be in addition, to the affordable housing and it should be allowed on exception sites.	Specialist housing could be delivered as market or affordable housing subject to local need. The policy requires locational and other criteria to be taken into account and there would be no automatic presumption in favour on exception sites.
It was considered that self-build homes should be excluded from the policy, or limited, as uncertain whether large sites would be suitable or limited and evidence on need and viability is required.	Self-build homes addressed by another policy in the BFLP.
Concerns were raised regarding the uncertainty of starter homes as the regulations have not been published and that starter homes should be considered under general housing policies, not within the category of affordable housing.	Starter homes will be addressed once the regulations are published. However, agreed that starter homes should be considered under general housing policy.

Issues and Options (2016)	
Main Issues Raised	Council's Response
Question 4: If there are any sites that you think would be suitable, available and achievable for housing (including older people, starter homes and self-build) to meet the Borough's needs during the plan period, please let us know by completing the Site Submission Form.	
Sites have been submitted and an assessment of their suitability, availability and achievability has been undertaken in the Strategic Housing and Economic Land Availability Assessment.	
Question 5: If there are any sites for gypsies, travellers and travelling showpeople that you think would be suitable, available and achievable to meet the Borough's needs during the plan period, please let us know by completing a site submission form.	
Sites have been submitted and an assessment of their suitability, availability and achievability has been undertaken in the Strategic Housing and Economic Land Availability Assessment.	
Question 6: Do you agree with the suggested policy approach to business, industrial and storage uses? If not, please specify why.	
A number of comments were made regarding the need to allocate sites for BIDs uses, have a balance between homes and jobs and to use criteria for protecting and releasing surplus employment land.	The plan will seek to ensure that the needs of businesses are met and to achieve an appropriate balance between jobs and housing. The proposed criteria based approach should provide a flexible policy enabling businesses to expand and adapt to changing needs.
Comments were made that the policy should acknowledge "smaller businesses" including those reliant upon hiring Community Centres and those needing small flexible use sites/yards for start-up businesses.	The BFLP will include policies for major housing sites that will include a requirement for the provision of community facilities commensurate with the scale of development proposed and where there is evidence of demand for a particular type of provision this will be planned for.
Concerns were raised that the policy should maintain the separation of BIDS developments and residential housing.	Mixed use housing and commercial development can be acceptable but the BFLP should ensure that sites suitable for

Issues and Options (2016)	
Main Issues Raised	Council's Response
	existing or new commercial operations that are noisy or otherwise not compatible with residential development are not encroached on by residential development.
Question 7: If there are any sites that you think would be suitable, available and achievable to meet the Borough's needs for business, industrial and storage uses during the plan period, please let us know by completing the form contained in: Site Submission Form.	
Three sites were put forward including Amen Corner South, Binfield Garden Centre and Jealott's Hill.	Amen Corner South is already allocated for a mix of housing, employment and other uses and the allocation will be reviewed as part of the new Local Plan. Binfield Garden Centre was already in a commercial use and Jealott's Hill has been promoted through the site submission process.
Question 8: Do you agree with the suggested policy approach to retail and commercial leisure uses? If not, please specify why.	
The agent for Sainsbury's, Princess Square, Bracknell suggested it should be retained within the Primary Shopping Area and Bracknell Town Centre Designation.	The extents of the Primary Shopping Area and the Bracknell Town Centre designation will be assessed in accordance with national guidance and the boundaries amended where appropriate.
A comment was made that there should be a reference to a local approach to small shops and to not prevent development of specialist shops.	The policy seeks appropriately sized units to serve local requirements and will not restrict specialist retail uses.
It was suggested that new developments should be restricted to those which can be serviced by existing shops and schools.	It is not realistic to expect existing schools to accommodate all the demand for school places that will be required from the new housing required in the Borough. It is also important that where large new developments are planned they are properly served by

Issues and Options (2016)	
Main Issues Raised	Council's Response
	neighbourhood centres including local retail facilities to reduce the need to travel and provide focal points for the new communities.
Question 9: If there are any sites that you think would be suitable, available and achievable for retail and commercial leisure uses to meet the Borough's needs during the plan period, please let us know by completing the form contained in: Site Submission Form.	
A number of sites were suggested including Binfield Garden Centre, WINK14 and WINK9 for.	The sites referred to have been promoted through the Strategic Housing and Economic Land Assessment (SHELAA) (CLP/Ev/10d-f).
Question 10: Do you agree with the suggested policy approach to strategic transport matters?	
Concerns raised that people prefer to use cars due to unreliable public transport.	The policy promotes an accessible public transport network as a high level planning principle.
Concerned that vehicle traffic flow/volume have been given insufficient weighting.	The amount and locations for growth will be fully considered in the transport modelling work.
Suggested that the plan gives weighting to accessibility as the determining factor of a sites' sustainability instead of giving equal weighting to social, economic and environmental sustainability. Feel that the approach is not consistent with the NPPF.	The approach to site selection is considered to be consistent with the NPPF.
Suggests all applications (other than major sites) should be assessed on site by site basis and presumed favourable unless adverse impacts are substantial.	Smaller development will have less transport impacts but a borough-wide consideration is considered appropriate.

Issues and Options (2016)	
Main Issues Raised	Council's Response
Question 11: If the Borough's future growth needs cannot be met in existing settlements and the countryside outside the existing boundary of the Green Belt, should we consider suitable, available and deliverable sites within the Green Belt as 'exceptional circumstances' for taking land out of the Green Belt to be used for the purposes of development?	
A number of comments were made either not supporting any development in the Green Belt or supporting development for small scale affordable homes, where well related to existing defined settlements or as a last resort.	The Spatial Strategy, the site selection, and the evidence base, will determine the most appropriate locations for development to meet the needs of the Borough.
A comment was made agree meet the Borough's future growth needs, including housing supply, could constitute such an exceptional circumstances and reference made to sites.	
Suggested that growth options study, a comprehensive environmental capacity assessment and an edge of settlement review are undertaken.	A joint review (with Wokingham Borough) Green Belt Review (CLP/Ev/5c) and a Landscape Character Assessment (CLP/Ev/5a) have been undertaken.
Question 12. A. Please rank the options for general approach to location of housing in order of preference (1 being the most preferred, and 4 being the least):	
1. On many small sites on the edge of settlements with some more building in existing settlements 2. On fewer, larger sites on the edge of the bigger more sustainable settlements with more building in existing settlements 3. On a few very large sites on the edge of the bigger more sustainable settlements 4. A mix of Options 1, 2 3	
B. Are there any other option that we should be considering, that could help meet housing need within Bracknell Forest?	
The majority favoured 4. 'A mix of Options 1, 2 and 3'. The least favoured option was Option 3.	

Issues and Options (2016)	
Main Issues Raised	Council's Response
Other comments stated that the approach should be based on the environmental capacity of settlements and the need to take constraints into account. There were also many comments regarding sustainable development and deliverability.	
Question 13: A. Please rank the options for general approach to location of housing in order of preference (1 being the most preferred, and 5 being the least): i) Prioritise the redevelopment of previously developed (brownfield), irrespective of location. ii) Prioritise greenfield sites. iii) Increase densities around transport hubs. iv) Maximise infill/intensification opportunities. v) Re-allocate traditional employment land for housing. B. Are there any other options that we should be considering?	
The ranking was as follows: 1; 2; 3; 4; 5. Other comments were received which said a mix of the options were needed and other options were put forward based on using all deliverable and available land, including employment land.	
Question 14 Other matters - Are there any other strategic matters that should be covered in the Comprehensive Local Plan?	
The majority of comments made did not relate to 'other strategic matters' but other issues covered by the BFLP such as Development Management issues, the process for producing a Local Plan, or are outside of the scope of a Local Plan.	No change required as don't relate to strategic matters.
Question 15 - Do you agree with the suggested policy approach to delineation of 'gaps' on the Local Plan Policies Map? If not, please specify why.	
There was a mix of support and objections for identifying gaps.	Considered appropriate to identify strategic gaps based on recommendations in an evidence base study.

Issues and Options (2016)	
Main Issues Raised	Council's Response
Question 17 - Do you agree with the suggested policy approach to landscape character? If not, please specify why.	
There was support for the policy.	No change required.
Question 18 - Do you agree with the suggested policy approach to development within the Green Belt? If not, please specify why.	
Comments were made regarding not having a policy.	It is considered appropriate to have a local policy.
Some comments were concerned with the strategic issue of Green Belt boundaries.	No change required as strategic issue.
A suggestion that including definitions of original building and disproportionate and materially larger would be useful.	Policy amended to reference terms.
Question 20 - Do you agree with the suggested policy approach to new rural workers dwellings? If not, please specify why.	
Comments were made that 12 months market testing is excessive or insufficient.	It is considered appropriate due to the nature of the land use.
Suggested wording was put forward concerned with referring to the occupant being unable find similar work at a nearby location; the operation at that site no longer needs the dwelling or is no longer viable.	Policy amended to reflect suggested wording.
Question 22 - Do you agree with the suggested policy approach to equestrian uses?	
Objections were made against including a policy.	It is considered appropriate to include as equestrian uses have specific needs.

Issues and Options (2016)	
Main Issues Raised	Council's Response
Concern was raised that Bridleway network access is not always necessary.	It is considered that appropriate evidence would be needed to demonstrate why bridleway access is not relevant.
Question 23 - Do you agree with the suggested policy approach to design?	
Concerns were raised that the policy is too prescriptive, detailed, should be proportionate, requirements for design briefs unnecessary.	Covered by other policies gain therefore no change required.
A number of wording changes were suggested including referring to neighbourhood plans, climate change adaptation, biodiversity enhancements, retention of features such as trees/hedgerows.	Policy amended to include neighbourhood plans and climate change adaptation. Other matters raised are addressed by other policies and the plan should be read as a whole.
Alternative approaches were suggested including producing a Supplementary Planning Document (SPD) on character, a strategic approach to Green Infrastructure is required.	Council has a Character Area Assessments SPD. A policy on Green Infrastructure is included in the Draft BFLP (2018).
Question 24 - Do you agree with the suggested policy approach to internal space standards?	
There was a number of objections to the policy as they are considered unnecessary and national standards should apply.	In order to implement the governments national standard there must be a Local Plan policy.
Question 25 - Do you agree with the suggested policy approach to protection of existing housing stock?	
Concern was raised that there should be exceptions where there is a net gain.	Policy would not apply where there is an overall net gain therefore no change required.
Question 26 - Do you agree with the suggested policy approach to affordable housing need (quota and threshold)?	
It was suggested that the threshold should be either reduced or increased or not have any threshold (decided on a site basis).	The threshold will be tested as part of the wider plan viability assessment. The provision of affordable housing will be required

Issues and Options (2016)	
Main Issues Raised	Council's Response
	unless it can be demonstrated that it would prejudice the viability of the development.
Question 27 - Do you agree with the suggested policy approach to housing mix (types, size and tenure)?	
Comments included that mix should be decided on a site by site basis and should be flexible	The policy is flexible and is based on evidence in the Strategic Housing Market Assessment (SHMA) (CLP/Ev/2c).
The mix for 3-4 beds was considered too high.	Mix is based on evidence in the SHMA (CLP/Ev/2c) and is considered appropriate.
Question 28 - Do you agree with the suggested policy approach to traveller sites?	
Additional criteria were suggested including avoidance of any unacceptable harmful impacts on heritage assets and biodiversity.	Policy amended to refer to heritage and the natural environment.
It was suggested that reference to social cohesion is deleted.	Policy amended to delete reference to social cohesion.
Question 29 - Do you agree with the suggested policy approach to advertisements and shop fronts?	
A comment was made that the policy seems to preclude improvements to shops outside retail centres.	Policy amended to include shops outside of the retail centre.
Recommends removal of reference to 'ground floor frontages' as this is considered to be overly restrictive.	Active ground floor frontages make an important contribution to the viability and vitality of shopping areas, therefore the erosion of this with dead frontages needs to be prevented.
Question 30 - Do you agree with the suggested policy approach to changes of use within defined retail areas?	
It was considered that policy is too subjective.	Policy amended to clarify when a change of use would be acceptable.

Issues and Options (2016)	
Main Issues Raised	Council's Response
Comments were made that the requirement to demonstrate that an existing use is surplus to requirement through marketing and economic viability is onerous or should be removed.	The requirement is considered appropriate however, the policy has been amended to clarify that the assessment is evidence based and proportionate.
Comments were made that the policy is not flexible enough to allow changes between use classes.	The policy does not prevent changes of use and there is greater flexibility in secondary frontages.
Question 31 - Do you agree with the suggested policy approach to protection of existing community facilities?	
Concern was raised that all cultural facilities are not commercial.	Policy amended to merge this policy and 'Safeguarding existing community infrastructure' policy in the Draft BFLP (2018) so no distinction is made.
One comment stated that reference to marketing and economic viability testing should be removed.	To justify the loss, robust evidence to demonstrate that options to retain the use have been exhausted is considered reasonable.
Question 32 - Do you agree with this suggested approach to heritage and conservation?	
Concerns were raised that the policy is too detailed or that a policy is not required/justified.	The policy sets out how national guidance will be applied locally and is considered appropriate.
A comment stated that the importance of a Conservation Area should also refer to the special interest of the Area.	Policy amended to refer special interests.
A number of comments were concerned with matters which the policy already addressed.	No change required as already addressed by policy.
Question 33 - Do you agree with the suggested policy approach to protecting designated nature conservation sites?	

Issues and Options (2016)	
Main Issues Raised	Council's Response
A comment was made that reference to the Wildlife and Countryside Act 1981 (as amended) is currently omitted.	Amend supporting text to refer to the Act.
Suggested word change to protection of local sites requiring the benefits to 'significantly' outweigh the biodiversity/geodiversity interest.	The wording reflects national policy therefore no change required.
One comment suggested an alternative approach where each application should be assessed on a case by case basis.	This is not considered practical therefore no change required.
Question 34 - Do you agree with the suggested policy approach to protecting and enhancing biodiversity?	
A number of comments were concerned with matters that the policy should cover which were already included.	No change required already addressed by policy.
It was suggested that an additional policy for the protection and enhancement of river corridors and watercourses is added.	Addressed by this and other policies.
One comment sought to delete the criteria relating to the mitigation hierarchy.	Mitigation hierarchy is national policy.
Question 35 - Do you agree with the suggested policy approach to the Thames Basin Heaths Special Protection Area?	
A comment was made about reducing the 400m buffer.	This is based on robust evidence and was agreed in South East Plan Policy NRM6.
There were some comments regarding flexibility regarding mitigation and contributions to management of Strategic Alternative Natural Greenspace (SANG).	It is considered the approach is flexible and allows contributions towards Council owned SANG for smaller developments which can't provide bespoke SANG.

Issues and Options (2016)	
Main Issues Raised	Council's Response
A comment was made about clarifying the need for bespoke SANG for large developments.	This will be agreed on a site by site basis. However, policy amended to clarify that requirements may vary according to proximity to the Thames Basin Heaths Special Protection Area (TBH SPA) boundary.
Question 36 - Do you agree with the suggested policy approach to low carbon and renewable energy generation	
Objections were received on the 10% or 20% of energy requirements from decentralised or renewable energy sources due to impact on viability, overly prescriptive and contrary to national policy.	The requirement is not contrary to national policy and has been tested through the viability assessment.
Question 37 - Do you agree with the suggested policy approach to sustainable construction?	
A number of comments were made regarding the BREEAM requirement stating that it is too difficult to achieve, too expensive or not necessary.	It is considered that BREEAM standards are widely recognised and are achievable and has been tested through the viability assessment.
There were objections to requiring water efficiency measures and the need for evidence to support their inclusion.	There is evidence to support the optional Building Regulations water efficiency standard as Bracknell Forest is in an area classified as under water stress.
Question 38 - Do you agree with this suggested policy approach to flood risk? If not, please specify why	
A comment that the policy should reflect the Strategic Flood Risk Assessment (SFRA).	A SFRA Level 1 and Level 2 (CLP/Ev/e and f) has been undertaken and policy amended to reflect the SFRA.
A comment considered all sources of flooding, not just fluvial, set out the requirement for the application of a sequential test/approach and exception test and how any proposed	These matters are included in the policy and supporting text however the amended policy will provide further clarification.

Issues and Options (2016)	
Main Issues Raised	Council's Response
development will be safe for the lifetime taking into account the impacts of climate change.	
A comment was made regarding protection of habitats from water related impacts and where appropriate seek enhancement.	Already addressed in the biodiversity and SUDs policies therefore no change required.
Question 39 - Do you agree with this suggested policy approach for drainage?	
It was suggested that each application should be considered on a site by site basis.	It is considered appropriate to provide a certainty and consistency therefore no change required.
Question 40 - Do you agree with the suggested policy approach to pollution and hazards?	
It was suggested that each application should be considered on a site by site basis/should be no policy.	It is considered appropriate to provide a certainty and consistency therefore no change required.
Additional wording was suggested including reference to the precautionary approach and mitigation during construction.	The policy was amended accordingly.
Question 41 - Do you agree with the suggested approach to contaminated land?	
There was a number of comments supporting not having a policy.	It is considered necessary to ensure a consistent approach therefore no change required.
A comment was made that groundwater vulnerability should be considered.	Supporting text was amended to reference groundwater vulnerability.
Question 42 - Do you agree with the suggested policy approach to detailed transport matters?	
Concerns were raised about cross boundary impacts on the transport network.	The Council will work with neighbouring as part of the Duty to Cooperate. This will involve sharing information (e.g. potential

Issues and Options (2016)	
Main Issues Raised	Council's Response
	development locations), modelling data and outputs and the overall transport impacts.
Question 43 - Do you agree with the suggest policy approach for securing infrastructure?	
There were a number of comments about providing adequate infrastructure.	The Infrastructure Delivery Plan (IDP) is an evidence base document that will programme the provision of necessary infrastructure for allocated sites.
A number of comments supported having no policy.	It is considered that a policy is required to ensure adequate provision.
Question 44 - Do you agree with the suggested policy approach to safeguarding existing community infrastructure?	
Clarity was sought regarding how this policy relates to the policy on protection of existing community facilities.	Policies merged. Amend so this policy and 'protection of existing commercial community facilities' policy merge in the Draft BFLP (2018).
Question 45 - Do you agree with the suggested policy approach to play, open space and sports?	
A number of comments supported having no policy.	It is considered that a policy is required to ensure adequate provision.
One comment stated that the 'standards' approach for Play, Open Space and Sports (POSS) is not appropriate or compliant with the NPPF.	The preferred policy approach does not rely on the PPG17 approach, instead it relates to a Play, Open Space and Sports (POSS) (CLP/Ev/4a) study and Playing Pitch Strategy (PPS) (CLP/Ev/4b) which have been produced using guidance from Sport England.
Natural England's considered work on Accessible Natural Greenspace Standard (ANGSt) may be of use in assessing current	The ANGSt standards focus more of larger open spaces over long distances and do not focus on more local access. There is no

Issues and Options (2016)	
Main Issues Raised	Council's Response
level of accessible natural Greenspace and planning improved provision.	need to adopt the ANGST standard as the Council has SANG and other open space standards. As part of the plan the Council is also intends to adopt a local access to nature standard.
Question 46 - Other matters. Are there any other Development Management planning issues that should be covered in the Comprehensive Local Plan?	
Comments were made regarding the need for various evidence base studies including an SFRA and Water Cycle Study.	A SFRA Level 1 and Level 2 (CLP/Ev/e and f) and a Water Cycle Study Phas1 and 2 (CLP/Ev/4c and h) have been undertaken.
There were a number of comments regarding additional polices setting out housing need, densities, parking requirements, and infrastructure, identifying areas of tranquillity, Public Rights of Way, protecting open space.	Matters addressed by other policies and the Plan should be read as a whole.
Thames Water consider a specific policy on water and sewerage infrastructure is required.	Infrastructure requirements will be addressed in IDP.
Comment was made that a policy on the presumption of sustainable development is required.	Policy on presumption of sustainable development added.
Wellington College consider they should have a specific policy.	This is not considered necessary.
The Royal Military Academy Sandhurst (RMAS) request a specific policy to enable the Academy to carry out required development similar to Policy SA10 of the Site Allocations Local Plan (SALP).	Policy SA10 of the SALP will be retained.

6. Draft Bracknell Forest Local Plan Consultation (February – March 2018)

6.1. What was the purpose of the consultation?

6.2. The consultation was on the first full comprehensive version of the draft BFLP (2018) under Regulation 18. It was informed by the Issues and Options consultation, results of duty to cooperate responses and evidence base studies, several of which have been subject to consultation prior to finalisation. The draft BFLP (2018) set out the vision, objectives, spatial strategy, development management policies to guide future development and proposed site allocations for the period up to 2034. The consultation documents are available to view on the Council's website⁸.

6.3. Consultation was carried out in accordance with the SCI and a consultation strategy and mandate was prepared. A consultation statement setting out the consultation process (including the consultation strategy), and copies of the consultation material are available on the Council's website⁹.

6.4. Consultation took place for just over a six week period between 8th February and 26th March 2018 gave local and was accompanied by the Sustainability Appraisal (SA) (incorporating a Strategic Environmental Assessment (SEA)), draft Habitat Regulations Assessment (HRA), and draft Infrastructure Delivery Plan (IDP).

6.5. Who was consulted?

6.6. A large number of local residents and stakeholders, including statutory consultees were consulted including:

- Those living and working within the Borough;
- Parish/Town Councils within the Borough;
- Adjoining County, District and Borough Councils;
- Specific consultees (such 'duty to co-operate' bodies and specific consultees, including Environment Agency, Natural England, Highways Agency and Historic England); and
- General consultees (including voluntary bodies, bodies which represent the interests of different racial, ethnic or national groups, different religious groups, disabled persons, and persons carrying on a business in the Local Authority area).

6.7. How were they consulted?

6.8. A number of methods were used to consult on the draft BFLP (2018) in order to ensure inclusive consultation as follows:

⁸ Draft BFLP consultation documents: <https://www.bracknell-forest.gov.uk/planning-and-building-control/planning/planning-policy/development-plan/draft-bracknell-forest-local-plan/draft-bracknell-forest-local-plan>

⁹ Draft BFLP Consultation Statement: <https://www.bracknell-forest.gov.uk/planning-and-building-control/planning/planning-policy/development-plan/draft-bracknell-forest-local-plan/evidence-base>

Method	Description
Make documents and supporting information available at Council offices and public libraries for inspection	<p>Hard copies of the main consultation document and supporting documentation (including non-technical leaflet in plain English) was also made available at the Council's Time Square office.</p> <p>Hard copies of the main consultation document and leaflets were deposited in local libraries (computer access, and thus access to the consultation portal (Objective), was also available at local libraries).</p>
Make documents, supporting information and electronic methods of responding available on the Council's website	<p>An online consultation event with the documents being consulted on and an online response form could be accessed using the online 'have your say' consultation portal (Objective). Those who were on the Planning Policy consultation portal database at the time, who had asked to be kept updated, were sent a notification informing them of the consultation and explaining how they could respond.</p> <p>The home page of the Council's website (including 'Consultations' page) and the Local Plan web page were used to advertise the consultation and a direct link was provided to the consultation event.</p>
Drop in sessions	<p>Exhibitions were held across the Borough at different locations, times and days in order to help optimise the accessibility of information to residents (dates excluded February half term):</p> <ul style="list-style-type: none"> • Binfield Library on 20 February (10am – 1pm) and 21 February (5pm – 8pm) • Bracknell town centre at Princess Square on 22 February (10am – 1pm and 5pm – 8pm). • Martins Heron Community Centre on 24 February (2pm – 5pm). • Winkfield Row at Carnation Hall on 27 February (10am – 1pm) and 28 February (5pm – 8pm). • Warfield Parish Offices on 1 March (5pm – 8pm) and 3 March (10am – 1pm). • Crowthorne Library on 6 March (10am – 1pm and 5pm – 8pm).
Information in the Council's newsletter (Town and Country)	<p>An article was placed in the Council's March 2018 edition of the newsletter 'Town and Country'. This is circulated to residents in the Borough. The article aimed to alert residents of</p>

Method	Description
	the consultation and explained how to register their comments.
Press releases to local newspapers	<p>A press release was sent to local newspapers/radio stations at the start of the consultation.</p> <p>A press advert was placed in a local newspaper (Bracknell News).</p>
Social media	Information was posted on the Council's social media accounts (Facebook and Twitter) throughout the consultation period.
Distribute information to Town and Parish Councils	<p>A meeting was held with Parish and Town Councils prior to the start of the consultation to advise of the nature of the consultation.</p> <p>Parish/Town Councils were formally notified and provided with hard copies of the consultation document and supporting documentation.</p>
Stakeholder groups	<p>The Economic Skills Development Partnership and Land Agents group were both informed of the consultation through presentations.</p> <p>Consultation with local voluntary and community groups via 'Involve' (a central support agency for over 600 voluntary and community action groups).</p> <p>Consultation with the Council's Access Group.</p>
Letters and e-mails to contacts on address database	An email or a letter (sent to those without email addresses) was sent to consultees explaining the nature of the consultation and where information was available.
Neighbour notification to properties	Notification of the consultation via a letter sent to properties around clusters of proposed site allocations.
Other	<p>A strap line was inserted into emails sent by staff in the Planning Section to advertise the consultation.</p> <p>An article was placed on the Council's intranet (Boris/Doris), under staff news, to help raise awareness amongst officers.</p>

6.9. What were the main issues and how have they been taken into account?

6.10. The consultation on the Draft BFLP and supporting documents generated a large amount of feedback and 475 groups, organisations and individuals responded. In total with 1570 comments were received and the majority of these comments were on the draft Local Plan, with some responses also commenting on the SA, draft HRA and draft IDP.

6.11. A detailed summary of responses to the draft BFLP consultation can be viewed on the Council's website¹⁰. The main issues raised during the consultation and how they have been taken into account are summarised in Table 2 below:

¹⁰ See Summary of Responses (Main Issues) to the Draft Bracknell Forest Local Plan Consultation:
<https://www.bracknell-forest.gov.uk/planning-and-building-control/planning/planning-policy/development-plan/draft-bracknell-forest-local-plan/draft-bracknell-forest-local-plan>

Table 2: Draft Bracknell Forest Local Plan Consultation (2018) - Summary of Main Issues Raised

Draft BFLP (2018)	
Main Issues Raised	Council's Response
Section 1- Introduction and Section 2 – Context	
The House Builders Federation (ID1279), Campaign to Protect Rural England Berkshire Branch (ID1530) and a number of developers/site promoters raised concern about lack of evidence of the duty to cooperate between BFC and other councils (including agreement on development/unmet needs) and that the duty to co-operate framework is out of date.	The Council is engaging constructively, actively and on an ongoing basis in the development of the Local Plan itself and its evidence base through the development of joint studies and consulting bodies such as the Environment Agency on the content of technical studies. Unmet needs have been discussed particularly in respect of Reading Borough, but the preference is that that should be met in the wider Reading urban area rather than Bracknell Forest.
A resident considers some of the evidence base is provisional; therefore, suitability assessment/allocation is not sound.	The BFLP is subject to refinement as further evidence becomes available.
Historic England (ID772) concerned about lack of reference to the historic environment in the portrait of the borough.	Portrait amended to refer to the historic environment.
Sections: 3.1 Vision and 3.2. Objectives	
Historic England (ID773) consider need to refer to the conservation and enhancement of the historic environment/heritage assets.	Vision amended to distinguish between the natural environment and the historic environment and heritage assets having regard to the emphasis within the NPPF to conserving and enhancing the historic environment.

Draft BFLP (2018)	
Main Issues Raised	Council’s Response
Berkshire, Buckinghamshire and Oxford Wildlife Trust (BBOWT) (ID1215-1219) considers objective B should mention the creation of new biodiversity assets.	Objective B amended to include the creation of new assets. Covered by Objective I.
Developer/site promotor Hall and Woodhouse Ltd (ID1208) consider objective B does not support new community facilities.	
Policy LP1: Sustainable Development Principles	
Historic England (ID774) iv) should refer to the “significance” of heritage assets.	Policy amended to refer to “significance” of heritage assets.
A number of residents raised concerns that the vision is not consistent with the proposed allocations	The BFLP must provide for the growth needs of the Borough over the plan period. The policies aim to do this in the most sustainable manner however, it is acknowledged that development will have an impact.
Developer/site promotor Gladman (ID1035) raised concerns regarding consistency with the presumption of sustainable development in national policy.	The policy is strategic and sets out principles that all development should meet to help achieve sustainable development.
Overarching Spatial Strategy	
Binfield Parish Council (ID251) and a resident considered Brownfield/urban centre sites should be developed in preference to greenfield.	It is not possible to accommodate all development needs on Brownfield/urban centre sites therefore a mix of brownfield and greenfield sites are proposed for allocation, with the most sustainable locations prioritised.

Draft BFLP (2018)	
Main Issues Raised	Council's Response
Developer/site promoter Barton Willmore on behalf of Syngenta (ID1546) concerned that have not allocated enough sites to meet employment needs.	Few sites were submitted for economic development through the SHELAA. It is considered that there should be sufficient capacity in the short to medium-term but it will be important to protect the employment areas. Economic floorspace will be monitored through planning permissions granted and completed together with vacancy rates to establish the long-term impact of BREXIT and revise provision, as necessary as part of the plan review process.
Binfield Parish Council (ID251), Sandhurst Town Council (ID1109) and few residents considers gaps between settlements should be maintained to protect their identity.	The need to provide development on greenfield sites will mean that some development will take place within the existing gaps between settlements. This will in some cases result in the partial erosion of such gaps. However, it is possible to accommodate development within a gap, whilst retaining the gap function.
Developer/site promoter Turley on behalf of Bloor Homes Ltd (ID1428) and Knight and Alfred Homes (ID1445) concerned that relative sustainability of settlements has not been assessed therefore no robust rationale for allocation of sites.	It is not considered necessary to define a settlement hierarchy in policy. The spatial strategy makes it clear that Bracknell Town is the focus of development followed by Sandhurst and Crowthorne and then other smaller settlements, reflecting their relative sustainability.
Policy LP2 - Provision of Housing (Policy LP3 in BFLP Revised Growth Strategy 2019)	
Chiltern District Council and South Bucks District Council (ID155) consider Berkshire Strategic Housing Market Assessment is not sound and is out of date. Considers South Bucks forms HMA with Buckinghamshire Authorities.	The housing need in the BFLP Revised Growth Strategy (2019) is based on the Local Housing Need assessment as required by the NPPF. The Objectively Assessed Need for Housing, as identified in the Strategic Housing Market Assessment (SHMA) (CLP/Ev/2c) is no longer used to inform the housing requirement.
Chiltern District Council and South Bucks District Council (ID155): no joint working with them on the MoU between the Berkshire Local Authorities in the Western Berkshire and	Bracknell Forest is in the Western Berkshire HMA and has been working with its partners.

Draft BFLP (2018)	
Main Issues Raised	Council's Response
Eastern Berkshire & South Bucks or Berkshire Spatial Framework. Failure of the duty to cooperate.	
Wokingham Borough Council (ID718) consider should meet Gypsy and Traveller cultural need, not just Planning Policy for Traveller Sites (PPTS) need.	The Council does not consider there is anything in either the PPTS, or the amended Housing Act which requires the Council to change the approach currently being taken to meeting the accommodation needs of those who meet the definition set out in the PPTS, and not the wider cultural need. Others are dealt with through the assessment of need.
A number of developers/site promoters consider should meet unmet need from Reading Borough, Slough, other authorities in the East Berkshire HMAs and Buckinghamshire.	Discussions have taken place on the issue of unmet housing needs. Reading Borough Council's preference is that it's unmet housing needs are met in the wider Reading urban area. Slough Borough Council's preference is that it's unmet housing needs are met in South Bucks.
Developers/site promoters consider that insufficient housing provision and additional sites should be allocated and flexibility allowance too small.	It is considered that sufficient sites have been allocated to meet the identified housing need. The flexibility allowance of 10% is considered appropriate.
A number of developers/site promoters consider plan period should be adjusted to 2013-2036.	The plan period has been amended in BFLP Revised Growth Strategy (2019) to 2020-2036.
A number of developers/site promoters and a resident consider more small site allocations needed.	It is considered that the proposed allocations include an appropriate mix of sizes.
A number of developers/site promoters questions the deliverability of sites due to too many large sites, adopted allocations, lapsed permissions and amount of windfall.	It is considered that sufficient sites have been allocated to meet the identified housing need and includes an adequate flexibility buffer.

Draft BFLP (2018)	
Main Issues Raised	Council's Response
Developers/site promoters (ID944, ID1547) own assessment of OAN is higher.	The housing need in the BFLP Revised Growth Strategy (2019) is based on the Local Housing Need assessment as required by the NPPF. The Objectively Assessed Need for Housing is no longer used to inform the housing requirement.
Policy LP3 - Sites allocated for residential/mixed use development (Policy LP4 in BFLP Revised Growth Strategy 2019)	
Specific sites not mentioned but a number of residents Binfield Parish Council (ID254), Winkfield Parish Council (ID569), Sport England (ID1044), and Campaign to Protect Rural England Berkshire Branch (ID1105, ID1529) raised concerns regarding sustainability, impact on rural/village character, biodiversity./ environment and heritage, cumulative impact with other developments, loss of gaps, lack of infrastructure, impact on SPA, increased traffic, pollution, flood risk, impact on facilities and services, loss of playing fields or built sports facilities.	Information on why sites are proposed for allocation is set out in the Housing Background Paper which summarises the more detailed topic-based evidence studies which address the matters raised. The infrastructure requirements associated with the development of the sites are detailed in the Infrastructure Delivery Plan (IDP).
The Environment Agency (ID1259): Cluster 5 is partially within the functional floodplain and therefore should not be supported for housing without robust justification and there is no evidence in the draft sequential test demonstrating how the test has been applied and the reasoning for allocating 2 sites which are at flood risk.	Policy amended to make it clear as to what development is proposed in the floodplain. The Draft Sequential Test (CLP/Ev/9c) clarifies the approach.
Policy LP3 - Sites Allocated for Residential/mixed use Development (Site BIN1 Land north of Tilehurst Lane)	
Opposition to proposed allocation from Binfield Parish Council (ID254) and residents on a number of grounds including: adverse impact on heritage; character and biodiversity, loss of trees; hedgerows and open space,	BIN1 is not proposed for allocation in the BFLP Revised Growth Strategy (2019) as the site has outline planning permission for 40 dwellings, granted on appeal October 2019 (reference: 17/01174/OUT).

Draft BFLP (2018)	
Main Issues Raised	Council's Response
increased traffic, highway safety, pressure on infrastructure and services, cumulative impact with other developments, density too high.	
Policy LP3 - Sites Allocated for Residential/mixed use Development (Site BIN5 Land south of Forest Road and east of Cheney Close)	
Strong opposition to proposed allocation from Binfield Parish Council (ID254) and large number of residents on a number of grounds including: adverse impact on heritage; character; tranquillity and biodiversity/wildlife, loss of trees; hedgerows; gaps; wellbeing; Green Belt and open space, increased traffic, pressure on infrastructure and services, cumulative impact with other developments/too much development, brownfield sites/commercial buildings should be developed first, previously led to believe the site (through Policy SA7) would be maintained as green space (gone back on previous Blue Mountain covenant), flood risk, Grade 3 agricultural land, small gain in numbers, contrary to draft and adopted policies/plan.	Information on why the site is considered appropriate for allocation is set out in the Housing Background Paper which summarises the more detailed topic-based evidence studies. The infrastructure requirements associated with the development of the site are detailed in the Infrastructure Delivery Plan (IDP).
Policy LP3 - Sites Allocated for Residential/mixed use Development (Site BIN6 Land south of Emmets Park and east of Cressex Close)	
Opposition to proposed allocation from Binfield Parish Council (ID254) and large number of residents on a number of grounds including: adverse impact on heritage; character; tranquillity, wellbeing, and biodiversity, loss of trees; hedgerows; gaps; Green Belt and open space, increased traffic; noise and pollution, highway safety, access via cul-de-sac not suitable, pressure on infrastructure and services,	BIN6 is not proposed for allocation in the BFLP Revised Growth Strategy (2019). Detailed information on why it is an omission site are set out in the Housing Background Paper.

Draft BFLP (2018)	
Main Issues Raised	Council's Response
cumulative impact with other developments/too much development, brownfield sites/commercial buildings should be developed first, previously led to believe the site (through Policy SA7) would be maintained as green space (gone back on previous Blue Mountain covenant), flood risk, site on steep slope, Grade 3 agricultural land, contrary to draft and adopted policies/plan.	
Policy LP3 - Sites Allocated for Residential/mixed use Development (Site BIN11 Popes Farm, Murrell Hill Lane)	
Opposition to proposed allocation from Binfield Parish Council (ID254) on following grounds: adverse impact on heritage and trees, increase in traffic.	BIN11 is not proposed for allocation in the BFLP Revised Growth Strategy (2019) as the site has outline planning permission (Ref: 17/00337/OUT).
Policy LP3 - Sites Allocated for Residential/mixed use Development (Site BRA6 Bracknell and Wokingham College, Wick Hill, Sandy Lane)	
Thames Water Utilities Limited (ID1527): wastewater network capacity is unlikely to support expected demand from the site.	BRA6 is not proposed for allocation in the BFLP Revised Growth Strategy (2019) as the site has planning permission (Ref: 17/00482/OUT).
Policy LP3 - Sites Allocated for Residential/mixed use Development (Site BRA7 Town Square, The Ring)	
Thames Water Utilities Limited (ID1527): wastewater network capacity is unlikely to support expected demand from the site.	A drainage strategy will be required to accompany any planning application submitted for the site.
Turley on behalf of Bloor Homes Ltd (ID1435) considers the density too high and subject to expiry or cancellations of tenancies so not available or developable.	The sites proposed for allocation have been assessed in the SHELAA (CLP/Ev/10h) and are considered suitable, available and deliverable.

Draft BFLP (2018)	
Main Issues Raised	Council's Response
Policy LP3 - Sites Allocated for Residential/mixed use Development (Site BRA13 Coopers Hill Youth and Community Centre, Crowthorne Road North)	
Bracknell Forest Society (ID163) and residents (ID844/846, ID1303) concerned about loss of community facility.	All new development in the borough will be supported by community centre infrastructure.
Policy LP3 - Sites Allocated for Residential/mixed use Development (Site SAND5 Land east of Wokingham Road, and south of Dukes Ride (Derby Field))	
Thames Water Utilities Limited (ID1527): wastewater network capacity is unlikely to support expected demand from the site.	A drainage strategy will be required to accompany any planning application submitted for the site.
Opposition to proposed allocation from Sandhurst Town Council (ID1111) and a resident on a number of grounds including: pressure on facilities and services, traffic, over development, contrary to adopted and draft policies.	Information on why the site is considered appropriate for allocation is set out in the Housing Background Paper which summarises the more detailed topic-based evidence studies. The infrastructure requirements associated with the development of the site are detailed in the Infrastructure Delivery Plan (IDP).
Sandhurst Town Council (ID1111) consider coalescence of settlements has not been taken into account.	The need to provide development on greenfield sites will mean that some development may take place within the existing gaps between settlements. This will in some cases result in the partial erosion of such gaps. However, it is possible to accommodate development within a gap, whilst retaining the gap function.
Crowthorne Village Action Group (ID567) and a resident (ID603) considers there is an opportunity to provide additional car parking for Crowthorne Railway Station and turning space for buses.	Policy amended to include a requirement for additional car parking for Crowthorne Train Station.

Draft BFLP (2018)	
Main Issues Raised	Council's Response
Crowthorne Village Action Group (ID567) and a resident (ID603) consider that Crowthorne Parish boundary should be changed to include site (site within Sandhurst Parish).	This is not a matter for the BFLP.
A number of developers/site promoters raised concerns over loss of open space/playing field with no justification/evidence.	Policy amended to include a requirement to provide alternative playing pitches to replace those currently on site.
Policy LP3 - Sites Allocated for Residential/mixed use Development (Site WAR9 Land north of Herschel Grange)	
Opposition to proposed allocation from Warfield Parish Council (ID670), Warfield Village Action Group (ID5/970) and residents on a number of grounds including: loss of amenity; countryside/greenfield; biodiversity/wildlife; trees and rural/linear character, urbanising, doubling size of village, adverse impact on wellbeing and heritage, increase in traffic/already congested, overdevelopment, air quality impacts, density too high, pressure on facilities and services, brownfield sites available, other sites should be developed, unsustainable location, flood risk/inadequate drainage, Grade 3 agricultural land, inadequate/unsafe access, not required to meet housing need, outside defined settlement, potential mineral deposits, contrary to draft and adopted policies.	Information on why the site is considered appropriate for allocation is set out in the Housing Background Paper which summarises the more detailed topic-based evidence studies. The infrastructure requirements associated with the development of the site are detailed in the Infrastructure Delivery Plan (IDP).
Warfield Village Action Group (ID970) and a number of residents consider allocation inconsistent with Warfield Neighbourhood Plan.	The Warfield Neighbourhood Plan is currently at examination. Neighbourhood Plans are able to allocate additional sites to those identified in a Local Plan.
Thames Water Utilities Limited (ID1527): wastewater treatment works is operating close to capacity.	A drainage strategy will be required to accompany any planning application submitted for the site.
Policy LP3 - Sites Allocated for Residential/mixed use Development (Site WAR10 Land north of Newhurst Gardens)	

Draft BFLP (2018)	
Main Issues Raised	Council's Response
Warfield Village Action Group (ID970) and residents consider allocation inconsistent with Warfield Neighbourhood Plan.	WAR10 is not is proposed for allocation in the BFLP Revised Growth Strategy (2019) as the site has outline planning permission for 50 dwellings (Ref: 16/01004/OUT) granted at appeal.
Thames Water Utilities Limited (ID1527): wastewater network capacity is unlikely to support expected demand from the site.	
Policy LP3 - Sites Allocated for Residential/mixed use Development (Site WINK15 Whitegates, Mushroom Castle, Chavey Down Road)	
Opposition to proposed allocation from Winkfield Parish Council (ID569- 578) and residents on a number of grounds including: adverse impact on character, loss of fields, increase in traffic, access narrow lack of infrastructure/services/public transport to support development, no employment or retail/leisure development, flood risk.	Information on why the site is considered appropriate for allocation is set out in the Housing Background Paper which summarises the more detailed topic-based evidence studies. The infrastructure requirements associated with the development of the site are detailed in the Infrastructure Delivery Plan (IDP).
Policy LP3 - Sites Allocated for Residential/mixed use Development (Site WINK20 Former Landfill Site, London Road)	
Opposition to proposed allocation from residents on a number of grounds including: loss of gap, biodiversity, increase in traffic, no facilities.	WINK20 is not proposed for allocation in the BFLP Revised Growth Strategy (2019). Detailed information on why it is an omission site are set out in the Housing Background Paper. However, the settlement boundaries on the Policies Map for the BFLP Revised Growth Strategy (2019) have been amended to include the site to facilitate development if contamination issues can be addressed in the future.
A number of developers/site promoters concerned that there is no evidence site can be remediated and is deliverable/viable.	
Thames Water Utilities Limited (ID1527): wastewater treatment works unlikely to support expected demand from the site.	

Draft BFLP (2018)	
Main Issues Raised	Council's Response
Policy LP3 - Sites Allocated for Residential/mixed use Development (Site WINK34 land to the rear of Forest View and Oriana, Longhill Road, and west of Fern Bungalow (extension of site allocated through Policy SA3 of the SALP))	
Developer/site promoter Boyer on behalf of Shanly Homes (ID1345) consider dwelling number should be increased.	The capacity of the site has been assessed and is set out in the Housing Background Paper.
Policy LP3 - Sites Allocated for Residential/mixed use Development (Site BIN7 Land south of Foxley Lane and west of Whitehouse Farm Cottage, Murrell Hill Lane)	
Opposition to the proposed allocation from Binfield Parish Council (ID254) and residents on a number of grounds including: adverse impact on heritage; landscape character; setting of village and amenity of adjoining occupiers, loss of biodiversity; trees and hedgerows, fragmentation of green wildlife corridor, narrow access, density too high, flood risk, outside settlement.	BIN7 is not proposed for allocation in the BFLP Revised Growth Strategy (2019). Detailed information on why it is an omission site are set out in the Housing Background Paper.
Policy LP3 - Sites Allocated for Residential/mixed use Development (Site BIN10 Popes Manor, Murrell Hill Lane)	
Opposition to the proposed allocation from Binfield Parish Council (ID254) and residents on a number of grounds: adverse impact on heritage (Grade II listed Popes Manor) and character, increase in traffic, brownfield sites should be developed first.	Information on why the site is considered appropriate for allocation is set out in the Housing Background Paper which summarises the more detailed topic based evidence studies. The infrastructure requirements associated with the development of the site are detailed in the Infrastructure Delivery Plan (IDP).
Policy LP3 - Sites Allocated for Residential/mixed use Development (Site BIN12 Land south of London Road (Eastern Field))	
No main issues.	

Draft BFLP (2018)	
Main Issues Raised	Council's Response
Policy LP3 - Sites Allocated for Residential/mixed use Development (Site BRA11 Bus Depot (Coldborough House), Market Street)	
Thames Water Utilities Limited (ID1527): wastewater network capacity is unlikely to support expected demand from the site.	The site is not proposed for allocation in the BFLP Revised Growth Strategy (2019) as it has planning permission (reference: 18/00964/FUL).
Policy LP3 - Sites Allocated for Residential/mixed use Development (Site BRA12 Former Bus Depot, Market Street)	
Thames Water Utilities Limited (ID1527): wastewater network capacity is unlikely to support expected demand from the site.	A drainage strategy will be required to accompany any planning application submitted for the site.
Policy LP3 - Sites Allocated for Residential/mixed use Development (Site BRA14 Jubilee Gardens and British Legion Club, The Ring)	
Opposition to proposed allocation from Barton Willmore on behalf of Syngenta (ID1552) and a resident on following grounds: loss of green/open space.	Information on why the site is considered appropriate for allocation is set out in the Housing Background Paper which summarises the more detailed topic-based evidence studies. The infrastructure requirements associated with the development of the site are detailed in the Infrastructure Delivery Plan (IDP). However, the site has been reduced in size to exclude the British Legion Club in the BFLP Revised Growth Strategy (2019) as it is not available.
Thames Water Utilities Limited (ID1527): wastewater network capacity is unlikely to support expected demand from the site.	A drainage strategy will be required to accompany any planning application submitted for the site.
Policy LP3 - Sites Allocated for Residential/mixed use Development (omission sites, and new sites promoted through the consultation)	
BIN4 Wyevale Garden Centre, Forest Road	

Draft BFLP (2018)	
Main Issues Raised	Council's Response
A resident stated site at risk of flooding. Site promotor state that site is suitable, available and achievable.	The sites were assessed alongside others that have been submitted and are considered to be less suitable for development than other sites that are proposed for allocation. Detailed information on why it is an omission site is set out in the Housing Background Paper.
BIN8 Land south of Foxley Lane and west of Murrell Hill Lane, Foxley Fields Developer/promotor considers site suitable, available and deliverable.	
New site BIN16 3M United Kingdom PLC Land between Cain Road and Turnpike Road (0.85ha) Developer/promotor considers site suitable, available and deliverable.	The new site is proposed for allocation in the Further Consultation on New Sites (2018) and the BFLP Revised Growth Strategy (2019). Detailed information on why it is proposed for allocation are set out in the Housing Background Paper.
New Site BIN17 Land north of Tile House and Honeysuckle Cottage, Tilehurst Lane Developer/promotor considers site suitable, available and deliverable.	The site was assessed alongside other that have been submitted and it is considered to be less suitable for development than other sites that are proposed for allocation. Detailed information on why it is an omission site is set out in the Housing Background Paper.
New sites BIN18 & BIN19 Cain Road, Binfield Developer/promotor considers site suitable, available and deliverable.	The new site is proposed for allocation in the Further Consultation on New Sites (2018) but not in the BFLP Revised Growth Strategy (2019). Detailed information on why it is an omission site ise set out in the Housing Background Paper.
New site: Land to the south west of Binfield and north west of Amen Corner North Developer/promotor considers site suitable, available and deliverable.	The site was assessed alongside other that have been submitted and it is considered to be less suitable for development than other sites that are proposed for allocation. Detailed information on why it is an omission site are set out in the Housing Background Paper.
Existing allocation Land north of Tilehurst Lane, Binfield	The site is not proposed for allocation as it has outline planning permission (reference: 15/00452/OUT).

Draft BFLP (2018)	
Main Issues Raised	Council's Response
Developer/promotor states site has permission (reference: 15/00452/OUT) but wants to increase density and include within settlement boundary.	The sites were assessed alongside other that have been submitted and are considered to be less suitable for development than other sites that are proposed for allocation. Detailed information on why they are omission sites is set out in the Housing Background Paper.
BRA1 Land at Parkview Farm, Old Wokingham Road Developer/promotor disputes the reasons for not allocating the site.	
New Site BRA16 Pinecroft, Old Wokingham Road Developer/promotor considers site available.	
SAND2 Land south of Sandhurst Lodge Developer/promotor considers site suitable and available.	
SAND3 Land south of Ambarrow Lane, west of Wokingham Road, and east of Lower Sandhurst Road Developer/promotor considers site suitable, available and deliverable.	
SAND4 Land south of High Street and east of Yateley Road, Sandhurst Developer/promotor considers site suitable, available and deliverable.	
New Site SAND8 Eagle House Field Site, Crowthorne Road, Sandhurst Developer/promotor considers site suitable, available and deliverable for C2 use.	

Draft BFLP (2018)	
Main Issues Raised	Council's Response
WAR3 Jealotts Hill International Research Centre, and land at Jealotts Hill, Maidenhead Road A Parish Council, residents and the site promotor support allocating the site as an alternative to sites proposed for allocation. Opposition to the site from a Parish Council.	The site is proposed for allocation in the BFLP Revised Growth Strategy (2019). Detailed information on why it is proposed for allocation is set out in the Housing Background Paper. The sites were assessed alongside other that have been submitted and are considered to be less suitable for development than other sites that are proposed for allocation. Detailed information on why they are omission sites is set out in the Housing Background Paper.
WAR4 and WAR 5 Land east of Binfield Road Developer/promotor states should be considered with WAR4 or for a care home.	
WAR4 and WAR5 Land north of Binfield Road, at Temple Park Roundabout, south west extremity of Cabbage Hill. Developer/promotor considers site suitable, available and deliverable.	
WAR8 Land between Newell Hall and Cuckoo Cottage, Warfield Street Residents oppose allocation of the site. Site promotor considers site suitable and deliverable.	
WAR12 Brookfield Farm, Bracknell Road, Warfield Developer/promotor considers site suitable, available and deliverable.	
WAR20 Land at St Michael's Grange, Osborne Lane, Warfield Developer/promotor considers site suitable, available and achievable.	
WAR23 Land at and adjacent to Home Farm, Forest Road, Warfield	

Draft BFLP (2018)	
Main Issues Raised	Council's Response
Developer/promotor considers site suitable, available and deliverable.	
WAR24 Scotlands House and Campground, Forest Road, Warfield Developer/promotor considers site suitable, available and deliverable.	
New Site WAR25 Land north and east of Steeple View, Gibbins Lane, Warfield Developer/promotor considers site suitable, available and deliverable.	
WINK7 Ronans, Forest Road, Winkfield Row Developer/promotor considers site suitable, available and deliverable.	
Omitted part of WINK14 (3 acres west of Braziers Lane at the southerly (Forest Road) end, between Tiles Cottage & NRM). Owner considers site suitable.	
Omitted part of WINK14 Owner considers site suitable.	
WINK17 Land at Chavey Down Farm, Long Hill Road Developer/promotor considers site suitable, available and deliverable.	
Owner of Site WINK18 Land at Whitegates, Longhill Road, Winkfield	

Draft BFLP (2018)	
Main Issues Raised	Council's Response
Developer/promotor considers site suitable, available and deliverable.	
WINK19 Land between London Road and Longhill Road Developer/promotor/owner considers site suitable and available.	
WINK 24 Land at Woodstock, Kings Ride, Winkfield Developer/promotor considers site suitable not considered to meet the purposes of the Green Belt.	
Site WINK 26 Swinley Edge, Coronation Road, Winkfield Developer/promotor considers site suitable as disagrees that all sites should be located outside Green Belt.	
WINK 29 Land south of Forest Road and north of Rhododendron Walk Developer/promotor considers site available.	
WINK30 Land at The Rough (including Pineways, The Victory and 32-42 New Road, Ascot) Developer/promotor considers site does not meet the purposes of the Green Belt.	
New Site at White Cottage, Forest Road (outside Borough boundary)	Site outside Borough.
Policy LP3 - Sites Allocated for Residential/mixed use Development (Site BRA15 Land east of Station Way and North of Church Road (Southern Gateway))	

Draft BFLP (2018)	
Main Issues Raised	Council's Response
Thames Water Utilities Limited (ID1527): wastewater network capacity is unlikely to support expected demand from the site.	A drainage strategy will be required to accompany any planning application.
Policy LP4 - Land at the Hideout and Beaufort Park, Nine Mile Ride, Bracknell (Policy LP5 in BFLP Revised Growth Strategy 2019)	
Natural England (ID114) states ecological assessments required due to close proximity to Bagshot Woods and Heaths SSSI (also designated as Thames Basin Heaths SPA).	Policy amended to require ecological assessments.
Natural England (ID114) considers policy should include a requirement for SuDS.	Policy amended to require SUDs.
Wokingham Borough Council (ID715) are concerned about increase in trips and limited opportunities for highway improvements.	The wider impacts on traffic flows arising from proposed allocations is being modelled and has identified planned highway improvements to mitigate impacts.
Wokingham Borough Council (ID715) and Wokingham Without Parish Council (ID804) concerned about coalescence between Wokingham and Bracknell/ loss of gap.	It is possible to accommodate development within a gap, whilst retaining the gap function. The need to provide development on greenfield sites will mean that some development will take place within the existing gaps between settlements. This will in some cases result in the partial erosion of such gaps. However, it is possible to accommodate development within a gap, whilst retaining the gap function.
Opposition to proposed allocation from Crowthorne Village Action Group (ID558), Warfield Environment Group (ID1190), RSPB (ID1228) and a number of residents on the following grounds including: loss of gap between Wokingham and Bracknell, erosion of character, overdevelopment, brownfield	Information on why the site is considered appropriate for allocation is set out in the Housing Background Paper which summarises the more detailed topic based evidence studies. The infrastructure requirements associated with the development of the site are detailed in the Infrastructure Delivery Plan (IDP).

Draft BFLP (2018)	
Main Issues Raised	Council's Response
sites should be developed first, loss of woodland/trees and green network links, has potential for heathland restoration, increase in traffic, impact on air quality, no links to settlement/isolated, pressure on facilities and services, health issues as close to sewage works and crematorium, outside settlement boundary, contrary to draft policies/plan.	
Developers/site promoters question deliverability/number of dwellings due to flood risk, high pressure gas pipeline, ecological constraints and multiple ownerships.	The site is considered suitable for development and justification is set out in the Housing Background Paper.
RSPB (ID1228) questions how effective SANG will function due to shape and fragmentation.	To ensure the SANG functions well work at the planning application stage will determine the SANGs exact location and other requirements in consultation with Natural England.
Thames Water Utilities Limited (ID1527): wastewater network capacity is unlikely to support expected demand from the site.	A drainage strategy will be required to accompany any planning application.
Policy LP5 - Land south of London Road, east of Bog Lane and west of Swinley Road (Whitmoor Forest), Bracknell	
Opposition to proposed allocation from Winkfield Parish Council (ID572), Bracknell Forest Society (ID164), Bracknell Friends of the Earth (ID1355), Society for the Protection of Ascot (ID806), and large number of residents on the following grounds including: drainage issues/flood risk, draining site will impact on surrounding bog, increase in traffic and pollution, highway safety, unsuitable access, inadequate/no public transport, no employment, retail or leisure, pressure on parking at Martins Heron station, lack of/pressure on facilities, services and infrastructure, no significant landscape buffer, loss of gap; wildlife corridor; biodiversity; open	The site (WINK22) is not proposed for allocation in the BFLP Revised Growth Strategy (2019) and information on why it is an omission site is set out in the Housing Background Paper.

Draft BFLP (2018)	
Main Issues Raised	Council's Response
space/recreational space; woodland/historic forest/lowland valley bog; open space; countryside/greenfield site/green belt and crownland, impact on SPA , SAC and Englemere Pond SSSI, unsuitable SANG car park, impact of SANG on Swinley Park and Brick Pits SSSI, odour from sewage works, convert commercial property/ regenerate housing/increase density instead, allocate land of lesser environmental value, not required to meet need, cumulative impact with other developments, loss of amenity for existing properties, not controlled by a developer, contrary to draft and adopted policies.	
Thames Water Utilities Limited (ID1527): wastewater network capacity is unlikely to support expected demand from the site.	
Natural England (ID115) policy should include provision of SuDS (ID115).	
Natural England (ID115) ecological assessment required to ascertain impacts on Englemere Pond SSSI.	
Developer/site promoter Hunter Page Planning for Castleoak (ID52/53) state site boundary should be amended to include Westwood House and Lodge to east and north.	
Developers/site promoters consider a secondary school is required.	
Developers/site promoters and a resident raised concern over deliverability and developability due to significant constraints including drainage, loss of gap, proximity to SSSI,	

Draft BFLP (2018)	
Main Issues Raised	Council's Response
wooded/biodiversity, gas pipeline, and restrictive covenants/land ownership around Bog Lane.	
Policy LP6 - Land at Winkfield Row	
<p>Opposition to proposed allocation from Winkfield Parish Council (ID573), Society for the Protection of Ascot (ID806, ID807), Maidens Green Society (ID1153, 1154), developers (ID427) and a large number of residents (including a petition 1946 with signatories) on grounds including: loss of gap; countryside/natural green areas/farmland/wildlife corridor; landscape/rural character/identity; trees; hedgerows and views, light pollution, urbanising, impact on Conservation Areas; listed buildings and historic landscape/field pattern, no employment or retail/leisure development or no community hub, too many primary schools in close proximity, increased traffic and pollution including noise, highway safety, roads not suitable/already congested, traffic model and Traffic Accessibility Assessment not correct, lack of public transport, unsuitable footpaths/cycle paths, design will encourage rat runs, closure of Braziers Lane, no green buffer, flood risk/increase flood risk elsewhere, water quality, pressure on facilities/services and infrastructure especially wastewater/drainage, lack of detail, inadequate consultation with stakeholders, disregards amenity of existing settlements, over development, too small to support significant new facilities, unsuitable site for size of development, other more suitable sites including brownfield, questions deliverability and viability, premature to indicate developable area boundaries without complete information, layout needs revising, contrary to draft and adopted policies/guidance,</p>	<p>The site (Cluster 5) is not proposed for allocation in the BFLP Revised Growth Strategy (2019) and information on why it is an omission site is set out in the Housing Background Paper.</p>

Draft BFLP (2018)	
Main Issues Raised	Council's Response
SANG will displace wildlife, SANG too small and unsuitable, planning history of refused applications, contrary to draft and adopted policies/plan/guidance, disagreed with Sustainability Assessment.	
Developers/site promoters (ID1370, ID427) consider site should be extended to include land between Braziers Lane and proposed site.	
Developers/site promoters (ID1289, ID1433) consider site not developable/should be omitted due to constraints including unsustainable location, heritage, landscape, flooding, multiple ownerships, planning history.	
Environment Agency (ID1260): site at flood risk but no requirements to address and policy should refer to need for flood risk assessment.	
Thames Water Utilities Limited (ID1527): wastewater network capacity is unlikely to support expected demand from the site.	
Policy LP7 – Land at Hayley Green	
Environment Agency (ID1261) raised concerns that the site is at flood risk but no requirements to address, and policy should refer to need for flood risk assessment.	The site (Cluster 7) is not proposed for allocation in the BFLP Revised Growth Strategy (2019) as it is proposed for allocation in the draft Warfield Neighbourhood Plan (currently at examination). However, the site is considered suitable for development as set out in the Housing Background Paper.
Thames Water Utilities Limited (ID1527): wastewater network capacity is unlikely to support expected demand from the site.	

Draft BFLP (2018)	
Main Issues Raised	Council's Response
<p>Opposition to proposed allocation from Winkfield Parish Council (ID574), Maidens Green Society (ID1155), and a large number of residents on following grounds including: loss of gap; rural character; green fields/ green space; green corridor, heritage; adverse impact on wildlife/biodiversity, flood risk/drainage issues, density/scale out of character, over development, urbanising, increase in pollution, increase in traffic, congestion, limited scope for highway improvements, highway safety, questions accuracy of transport model, access inappropriate, location does not reduce travel, lack of public transport, improvements to footpath/cycle path network limited/unclear, too small to provide infrastructure to be made sustainable, no retail, leisure or employment uses, pressure on facilities and services including foul and surface drainage, queries need for school, need for secondary school, concept plan does not reflect evidence base, open space/developed areas in wrong location, no buffer between existing residents, questions deliverability due to provision of infrastructure and drainage and multiple owners, unsustainable location, should be considered with other nearby sites, concept plan contrary to evidence/evidence incomplete/incorrect, contrary to draft policies/plan/Sustainability Appraisal</p>	
<p>Residents consider there is conflict between draft Warfield Neighbourhood Plan concept plan and the draft Local Plan concept plan.</p>	
<p>Developer/site promoter Turley on behalf of Berkeley Strategic Land Ltd (ID1494 & 1495) and Turley on behalf of Bloor Homes Ltd (ID1434) consider no certainty will be</p>	

Draft BFLP (2018)	
Main Issues Raised	Council's Response
allocated in Warfield Neighbourhood Plan. Including in draft Local Plan pre-determines the Neighbourhood Plan. Alternative site needed.	
Developer/site promoter Pegasus Group for the Whitaker Family (ID1498-1507) consider site not a sustainable location and in multiple ownerships.	
Developer/site promoter Boyer on behalf of Jordan Construction (ID1360, 1362) concerned about conflict with Warfield Neighbourhood Plan (WNP) (inclusion of school, difference in site boundary, different concept/masterplan), questions whether need to allocated in Local Plan when in WNP.	
Developer/site promoter Boyer on behalf of Jordan Construction (ID1360, 1362) queries need for school.	
Policy LP8 - sites allocated for economic development (Policy LP9 in BFLP Revised Growth Strategy 2019)	
Chiltern District Council and South Bucks District Council (ID155) considers that fails to meet Duty to Cooperate requirements:(have never agreed functional economic market area (FEMA) geography defined for the six Berkshire authorities, inconsistencies between the housing and economic market geographies evidence, which concludes there are three functional economic areas across Berkshire (compared to two housing market areas), which supports the case for a single Berkshire-wide functional economic market area.	The extent of the Berkshire FEMAs was based on a range of data that gave an indication of strengths of relationships and 'best fit' as set out in the FEMA Study (CLP/Ev/3a). Bracknell Forest is shown as being in a Central Berkshire FEMA (which doesn't include S Bucks). A Berkshire wide FEMA would not be sensitive to some of the more refined relationships. Whilst the aim of the duty is to 'encourage positive, continual partnership working on issues that go beyond an LPA's area, it is not a duty to agree. S Bucks have been involved in consultations on this work.

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Main Issues Raised	Council's Response
Binfield Parish Council (ID261), Crowthorne Parish Council (ID398), a number of site developers/promoters and Wokingham Borough Council (ID717) consider that there is a need for more economic floorspace to meet projected need.	The EDNA (CLP/Ev/3b) has been updated by the Bracknell Forest Employment Land Study (2020) (LPEv/3e) which identifies a lower need for office, industrial and warehousing floorspace than the EDNA. Few available sites were submitted for consideration by the Council. The need to protect the existing designated employment areas is recognised alongside the creation of new opportunities for economic development in the Town Centre. There will be a need to monitor the situation carefully in view of the uncertainty surrounding BREXIT.
Developer/site promoter Hewlett Packard Enterprise (ID1330) considers floorspace figures in the EDNA don't reflect the market.	The EDNA has been updated by the Bracknell Forest Employment Land Study (2020) (LPEv/3e).
Developer/site promoter Wyevalle Garden Centres (ID754) commented that need sites outside Bracknell.	The spatial strategy is to focus economic development in the defined employment areas, some of which are outside Bracknell Town. Policy LP28 Employment Development outside Employment Areas also supports business, industry, distribution and storage uses (BIDS) development outside the defined employment areas which will help create a range of different types and sizes of employment premises across the Borough.
In relation to site BRA13 (Coopers Hill Youth and Community Centre, Crowthorne Road North) Bracknell Town Council (ID435) considers that need continued provision of a community hall / meeting place in central Bracknell.	The IDP will assess the need for community facilities.
Policy LP9 - Strategic and local infrastructure (Policy LP12 in BFLP Revised Growth Strategy 2019)	
Binfield Parish Council (ID262), Winkfield Parish Council (ID570), and residents raised concerns that there is no	The developer of any proposed site would need to demonstrate its impact and provide detail of any mitigation measures in their accompanying transport assessment.

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Main Issues Raised	Council's Response
capacity in road network, is already congested and lack of public transport	
Binfield Parish Council (ID262) consider there is a need for new pitches.	The need for pitches has been assessed in the Playing Pitch Strategy for Bracknell Forest (CLP/Ev/4b).
Royal Borough of Windsor and Maidenhead (ID1374) uncertain whether there will be adequate SANG capacity and that further work is needed on air quality.	The Habitats Regulation Assessment demonstrates that there is sufficient SANG capacity for all the allocations in the BFLP and that SANG capacity has been safeguarded for this purpose. An air quality assessment of the Local Plan is in progress.
Royal Borough of Windsor and Maidenhead (ID1374), Surrey County Council (ID1396) and Society for the Protection for Ascot (ID809) concern regarding impact of development outside the Borough on road network.	The strategic transport model will assess the impact of the proposals. Where appropriate, improvements will be made to existing road infrastructure to ensure any additional demand is catered for.
Environment Agency (ID1262) recommend the policy requires developers provide Foul and Surface water Drainage Strategy at planning application stage at the latest.	IDP updated to require a drainage strategy.
Education & Skills Funding Agency (ID816) should clarify the requirements for delivery of new schools e.g. when they should be delivered, site area.	On-site school provision (where required) will be specified in the strategic policies and in the IDP. Further details will be considered at planning application stage.
A resident considers that policy 2 nd para "Development proposals should satisfy one or more of the following criteria:" needs clarifying as a viability assessment could demonstrate that not all criteria have to be met.	Policy amended to clarify that proposals will have to meet all the criteria appropriate to the scale and nature of the development.
Policy LP10 - Presumption in favour of sustainable development (Policy not included in BFLP Revised Growth Strategy 2019)	

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Main Issues Raised	Council's Response
Historic England (ID776): Considers Paragraph 10.1.5 is misinterpretation of paragraph 14 of the NPPF as where designated assets (SSSIs or Green Belt) are affected, the presumption in favour of sustainable development is applied by paragraph 14 in a different way for plan-making and decision-taking.	Policy not included in the BFLP Revised Growth Strategy (2019) as there is no need to duplicate the wording of the NPPF.
Policy LP11 - Protection of countryside (Policy LP33 in BFLP Revised Growth Strategy 2019)	
The Environment Agency (ID1263), Crowthorne Parish Council (ID402) and residents consider the policy should cover Scheduled Monuments, the water environment and environmental value.	These matters are covered by other policies and the plan should read as a whole.
Ministry of Defence (ID767) considers there is conflict with SA10 (of the Site Allocations Local Plan). The Policy could require justification for any development in the countryside, undermining SA10 and cross reference is needed.	It is not intended to replace or revoke Policy SA10 of the Site Allocations Local Plan, therefore, the policy would remain following adoption of the Bracknell Forest Local Plan. It is not considered necessary to cross refer to a policy in another Local Plan, as the development plan is considered as a whole.
Sandhurst Town Council (ID1117) para 11.1.6 should be amended so that creation of new residential curtilages will be resisted.	It is not considered necessary to add additional wording 'shall be resisted'. However, additional text will be added to the paragraph in relation curtilage being proportionate to the size of the building, and in keeping with surrounding rural character.
Developer/site promotor Leigh (ID73) states that the draft policy imposes restrictions on types of development outside settlement boundaries and not within specific policy designations such as Green Belt, SPA etc and there is no basis for this in the NPPF. Use of the term 'inappropriate development' indicates the policy is seeking to impose control	Policy amended to refer to proposals being permitted which accord with national policy.

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Main Issues Raised	Council's Response
over development in the countryside, it is a term used to control development in the Green Belt.	
Developer/site promotor Bewley Homes (ID 1481) considers the policy does not allow for new dwellings of exceptional quality, as in the NPPF.	It is not necessary to repeat national policy
Developer/site promotor Boyer Planning for JPP Land/Hodge Developments (ID802) considers to align with the NPPF, the assessment should be based on harm rather than impact.	Policy amended to refer to proposals being permitted which accord with national policy (LP33 of the Revised Growth Strategy (2019)) and separate landscape character policy (LP35 of the Revised Growth Strategy (2019)).
Developer/site promotor Gladman (ID1029) considers policy to be inconsistent with the NPPF, which refers to recognising not protecting the intrinsic character and beauty of the countryside.	
Developer/site promotor Gladman (ID1029) considers there are no criteria to support economic development in the countryside or to consider circumstances in which a 5 year housing land supply cannot be demonstrated.	
Developer/site promotor Woolf Bond for Warfield Park (ID1286) objects as it prevents development on additional park homes within and adjoining the Warfield Park site, which is not consistent with the current approach, saved Policy EN11 (of the Bracknell Forest Borough Local Plan).	
Policy LP12 - Landscape character and strategic gaps (Policy LP18 and LP35 in BFLP Revised Growth Strategy 2019)	
Crowthorne Parish Council (ID403), Campaign to Protect Rural England Berkshire Branch (ID1105) and a number of	Policy and supporting text amended so relates to Development Management issues. The justification for gaps relates to a strategic

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Main Issues Raised	Council's Response
<p>residents objected to the omission of a gap between Crowthorne and Bracknell.</p> <p>Royal Borough of Windsor and Maidenhead (ID1372) raised concerns about loss of gap between Ascot.</p> <p>A resident objected to the omission of a gap between Binfield and Bracknell.</p> <p>A resident raised concerns there is no gap between Binfield and Warfield.</p>	<p>matter which is addressed in Policy LP18 of the Revised Growth Strategy (2019).</p> <p>A 'gap' between Crowthorne and Bracknell will be retained, even though development is proposed at the Beaufort site. A smaller allocation is proposed in the Revised Growth Strategy (2019) (for more information see the Housing Background Paper).</p> <p>A 'gap' between Ascot and Bracknell will be retained. Allocations at Whitmoor Forest and Winkfield Row (LP5 and LP6) are not proposed in the Revised Growth Strategy (2019) (for more information see the Housing Background Paper).</p> <p>A 'green wedge' is proposed between Binfield and Warfield in the Revised Growth Strategy (2019).</p>
<p>Sandhurst Town Council (ID1118) objects as policy implies development is acceptable.</p>	<p>It is possible to accommodate development within a gap, whilst retaining the gap function. Therefore, it is not considered appropriate to refer to all development within gaps being resisted.</p>
<p>A number of site promoters/developers consider the policy should be deleted as unnecessary and unjustified and object to the strategic gaps.</p>	<p>Policy and supporting text amended so only relates to Development Management issues. The justification for gaps relates to a strategic matter which is addressed in Policy LP18 of the Revised Growth Strategy (2019).</p> <p>It is considered that 'gaps' are justified through the evidence contained in the supporting landscape documents (CLP/Ev/5a and CLP/Ev/5b).</p>

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Main Issues Raised	Council's Response
Developer/site promoter Barton Willmore on behalf of Syngenta (ID1556) suggested wording changes to the criteria i) and iv) to protect gaps "where possible".	Policy amended to refer to what proposals are expected to demonstrate rather than a list of criteria.
LP13 - rural workers dwellings (Policy LP36 in BFLP Revised Growth Strategy 2019)	
Historic England (ID778) would like a criterion on ensuring no adverse impact on the historic environment/heritage assets, or at least a requirement that such development proposals conform with other policies of the Plan.	This addressed by other policies in the BFLP and the Plan should be read as a whole
Policy LP14 - occupancy conditions (Policy LP37 in BFLP Revised Growth Strategy 2019)	
No main issues.	
Policy LP15 - equestrian uses (Policy LP38 BFLP Revised Growth Strategy 2019)	
A number of residents consider supporting text in para 1.4.6 should refer to polo grounds and protection of hedgerows	Criterion ii) of the policy requires that equestrian development will not cause harm to a site of nature conservation, landscape or historic value that cannot be satisfactorily be mitigated. Hedgerows would also be protected by Green Infrastructure Policy (LP15).
Developer/site promoter Leigh (ID74) on behalf of the Royal Country of Berkshire Polo Club consider criterion i) is not necessary, as other criteria (such as ii-v) set out tests which will be applied to any proposed development	Criterion i) makes it clear that, where it is possible to do so, any new facility should be satisfactorily integrated with existing buildings.
Policy LP16 - Green Belt (Policy LP34 in BFLP Revised Growth Strategy 2019)	
Winkfield Parish Council (ID569) considered the Green Belt review should have allowed development on the edge of	A review of villages in the Green Belt was undertaken in the Green Belt Village Assessment (CLP/Ev/5d) to determine whether it was appropriate to define a boundary for the purposes of infilling.

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Main Issues Raised	Council's Response
existing developments as this has adversely affected some employers by limiting expansion.	
A resident states that the policy does not refer to brownfield sites.	The draft Policy refers to proposals being permitted where they are consistent with the exceptions listed in national planning policy, therefore it is not considered necessary to repeat and include all the exceptions within the BFLP.
Developer/site promotor Cogito Consulting Limited for Bilton Land Ltd (ID237) considers that the existing defined Green Belt Village of 'Prince Consort Drive' should be reinstated and be extended in geographical area.	The Green Belt Villages (LP/Ev/5d) assessment sets out the justification/assessment for whether an area defined in the Bracknell Forest Borough Local Plan (2002) should remain.
Developer/site promotor Leigh (ID75) considers criterion c) to be inconsistent with the NPPF (para 97).	The intention of criterion c) is to define a village envelope on areas within the existing Green Belt where 'limited infilling in villages' would be appropriate. Supporting text amended to make it clear that it is not the intention to exclude these villages from the Green Belt and define a settlement boundary around them.
Developer/site promotor Leigh (ID75) and Jones (ID600) state that criterion (a) introduces an additional test relating to replacement buildings. Para 89 of the NPPF does not require an improvement in openness.	Policy amended to refer to proposals being permitted which accord with national policy.
Developer/site promotor Leigh (ID75) queries purpose of criterion b) as reuse of building test is set out in the NPPF (para. 90) does not make any distinction between any type, age or appearance of building.	
Developer/site promotor Bewley Homes (ID1486) and Pegasus for Rumsey (ID1456) states that the first sentence	

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of the policy is inconsistent the NPPF (para 89) which sets out exceptions where new buildings are not considered inappropriate, as recognised in the second line of Policy LP16.	
Policy LP17 - Developed sites in the Green Belt: Syngenta (not included in BFLP Revised Growth Strategy 2019)	
Sandhurst Town Council (ID1120) considers any development outside the current built envelope (defined where there is current development that could be classed as PDL) must be resisted.	The site is proposed for allocation for comprehensive mixed-use development in the BFLP Revised Growth Strategy (2019) (Policy LP7). Therefore, there is no need for a separate policy relating to developed sites in the Green Belt.
Warfield Parish Council (ID680) oppose redevelopment.	
Pegasus for Rumsey (ID1457) and Bewley Homes (ID 1480) considers it would be appropriate and necessary to confirm that any redevelopment proposals for the site should focus upon employment use.	
Barton Willmore on behalf of Syngenta (ID1557) and Binfield Parish Council (ID270) consider that proposed new Science and Innovation Park at Syngenta, should be included as an allocation and policy should be removed.	
Policy LP18 – Design (Policy LP19 and LP39 in BFLP Revised Growth Strategy 2019)	
There were a number of comments from residents in relation to how the proposed sites meet the policy requirements.	Planning applications will be assessed against all the policies in the BFLP.
Environment Agency (ID1265) considers criterion iii) should refer to aquatic environment and river corridors.	The Design policy has been revised and is now split into a strategic policy, setting out the key principles of design in new development, and a second policy which focuses on the how to deliver the

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	principles. Delivery of the design principles sets out the need for a full site appraisal, identifying site assets, the retention of existing assets worthy of retention, including visual and ecological assets. The policy goes on to state that the value of assets that have a visual importance or inform character. It is felt that any aquatic or river corridor would form part of a site asset that will be assessed in terms of value and worthy of retention if appropriate. Additional wording has therefore not been included.
Developer/site promoter Broadmoor Hospital – West London Mental Health Trust considers that a design code should not be required for larger developments.	Considered justified in order to provide a comprehensive and inclusive approach to a development site.
A number of developers/site promoters and a resident consider wording of criterion (iii) indicates all trees should always remain. This may be inappropriate due to the condition of the feature and wider intentions of the proposal.	Wording has been amended to address this comment, in part. The design policy within Part 2 refers to retaining assets on a site, such as trees, where they have visual, ecological or heritage value, or are of a quality that is worthy of retention or where they are visually important or inform character. Developers and site promoters should work within the site assets where they meet the criteria set out in the policy.
A number of developers/site promoters states there is no definition of “larger and more complex developments”.	The text of the strategic design policy in Part 1 has now been amended to specify which sites will need masterplans and design codes. However, should new sites come up for development in the future there remains scope within the wording to require a masterplan or design for a large or sensitive site This is in line with current government design guidance.
Policy LP19 - Tall Buildings (Policy LP40 in BFLP Revised Growth Strategy 2019)	
Historic England (ID780) concerned about reference to “a point of townscape significance”, as such significance might be historic and/or derive from historic buildings or features on the site, with which the tall building would compete for	The strategic design policy in Part 1 states at i) that proposals will be supported where they “enhance the distinctive character, heritage, amenity and/or appearance of the local area”. The Tall Buildings policy in Part 2 has now been amended to state that tall buildings will

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dominance and harm the significance of the historic building or feature.	be supported where, "they will not detract from the significance or appreciation of heritage assets, nor have a detrimental impact on the local environment, including micro-climate and the amenity of surrounding buildings and spaces"
Two residents consider should include of A330 east of Hawthorn Hill to Malt Hill Garth Meadows, Warfield and Frost Folly/Jealott's Hill area of Warfield to the list of views.	The supporting text has been amended to include additional sites for an assessment of longer views of any proposal for a tall building, including from the A330, Ascot Road, in the vicinity of Weller's Lane.
Developer/site promoter Persimmon Homes North London (ID1405) considers policy is overly prescriptive and does not allow for flexibility/originality of design approaches advocated in the NPPF (paras. 59 & 60). Also inconsistent with the draft Policy LP1 which seeks to make efficient use of land.	The policy ensures that any tall building is of an exceptionally high quality design, appropriate for the location, fit for purpose and ensuring that it does not have a negative impact on surrounding buildings or spaces in accordance with the NPPF. It is considered that the policy places no restriction on originality or flexibility of design approaches.
LP20 - Internal Residential Space Standards (not included in BFLP Revised Growth Strategy 2019)	
A number of developers/ site promoters consider policy not necessary or justified with evidence.	Policy not included in the BFLP Revised Growth Strategy (2019) as evidence does not support its inclusion, and there are concerns about the viability.
Policy LP21 - Protection of Existing Housing Stock and Land (Policy LP21 in BFLP Revised Growth Strategy 2019)	
No main issues raised.	
Policy LP22 - Housing for Older People (Policy LP22 in BFLP Revised Growth Strategy 2019)	
A number of comments were received from Bracknell Forest Society (ID167), Binfield Parish Council (ID274) and Sandhurst Town Council (ID1124) concerning provision of adequate parking.	The provision of car parking will be required in accordance with the Parking Standards SPD (March 2016) or any subsequent replacement.

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Developers/site promoters Hunter Page Planning for Castleoak (ID54) and Gladman (ID1026) considers policy takes a simplified approach for C2 uses related only to bed spaces/traditional care homes	It is recognised that only part of the need will be met through specialist care homes. However, policy amended to ensure supporting text explains that each proposal for specialist housing will be assessed on its own merits to determine whether it falls within Class C2 or C3.
Developers/site promoters Hunter Page Planning for Castleoak (ID54) considers the requirement is too low.	The SHMA (CLP/Ev/2c) assesses the need for accommodation within Class C3 and C2 since both categories can deliver for the needs for older people. Additional evidence has been produced to assess self-build and custom build housing in the Bracknell Forest Housing Needs Assessment (LP/Ev/2g).
Developers/site promoters Bewley Homes (ID1323) considers the requirement to be in a sustainable location for all types of specialist housing where residents have dementia or mobility problems is not needed.	Each proposal for specialist housing would be considered on its own merits (whether within Class C2 or C3) and the locational requirements for each would be assessed accordingly.
Policy LP23 - Self Build and Custom Built Housing (Section 6.9 in BFLP Revised Growth Strategy 2019)	
A resident and a number of developers/site promoters consider the 5% requirement is too high, not flexible, viable or justified/consistent with no clarity on the timescale being provided after which a developer would get to build the dwellings out	<p>The requirement for multiple services plots is to be restricted to the larger site allocations due to viability considerations. Smaller scale proposals for self - build and custom build housing will be considered on their own merits.</p> <p>Additional evidence has been produced to assess self - build and custom build housing (Bracknell Forest Housing Needs Assessment (LP/Ev/2g)) and the delivery of self-build and custom build housing has been factored into the whole plan viability assessment.</p> <p>The delivery mechanism for the self-build will form part of and SPD which will address the 'fall back' in the event that plots are not taken up following a marketing exercise.</p>

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Policy LP24 - Affordable Housing (Policy LP8 in BFLP Revised Growth Strategy 2019)	
Concerns were raised by Parish Councils and residents that the affordable housing requirement is not adhered to and developers will not provide.	Policy amended to require 35% of affordable housing to be provided on qualifying sites. The Council will expect the requirements for the delivery of affordable housing to be met.
A large number of developers/site promoters considers 35% requirement for affordable housing to be too high and not deliverable/viable.	<p>The BFLP will be subject to whole plan viability which will assess the cost of affordable housing. The applicant would need to justify the need for a viability assessment at the application stage in accordance with the NPPF.</p> <p>Policy amended:</p> <ul style="list-style-type: none"> - to provide for the delivery of affordable housing on site unless exceptional circumstances have been demonstrated - to explain that the policy position has been informed by viability work, the Council will expect these requirements to be reflected fully in planning applications.
Policy LP25 - Housing Mix – Tenure Size and Accessibility (Policy LP23 in BFLP Revised Growth Strategy 2019)	
A large number of developers/site promoters consider that regard is had to market conditions and the sites location/character and planning status (i.e. if already allocated).	Policy amended to require a mix of dwellings and tenures and to explain when, subject to site specific circumstances, a variation from the policy may be allowed.
A number of developers/site promoters consider that the need for the optional technical standards (wheelchair accessible) has not been demonstrated and is not consistent with the PPG as it only applies to those dwellings: "where the	Additional evidence has been produced on affordable housing and other housing needs, including housing for older people and people with disabilities (Bracknell Forest Housing Needs Assessment (LP/Ev/2g)). Policy amended to include reference to the need to

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local authority is responsible for allocating or nominating a person to live in that dwelling.	provide for older people and people with disabilities and to cross refer to policy LP22 of the Revised Growth Strategy (2019).
Policy LP26 - Travelling Populations (Policy LP24 in BFLP Revised Growth Strategy 2019)	
Binfield Parish Council (ID278) state that no information has been provided as to proposed locations for the additional five Gypsy and Traveller pitches.	Since 2016/17, the Council has granted permission for 3 further pitches (which have been delivered) and at the time of writing was considering proposals for other sites that if found to be acceptable, would meet the outstanding need.
Wokingham Borough Council (ID719) state criterion i which specifies that there must be an identified need in order for applications to be considered acceptable is contrary to national policy.	Criterion deleted.
Historic England (ID781) consider criterion iii which refers to historic assets should be reworded to avoid harm, rather than mitigate it.	As the BFLP is read as a whole reference to 'historic assets' has been deleted and supporting text amended to make reference to Policy LP35 Protection and Enhancement of the Historic Environment and that national policy sets out that development proposals should avoid or minimise harm to heritage assets.
Environment Agency (ID1266) should refer to avoiding areas at risk of flooding.	As the BFLP is read as a whole supporting text amended to refer to LP17 Flood Risk and LP48 Sustainable Drainage Systems of BFLP Revised Growth Strategy (2019) and that national policy sets out that sites for travelling populations should not be located in areas at high risk of flooding (including functional floodplains).
Policy LP27 - Employment Areas (Policy LP25 in BFLP Revised Growth Strategy 2019)	

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Developer/site promotor Hewlett Packard Enterprise (ID906) consider policy does not provide sufficient flexibility to be responsive to changing market needs, site-specific circumstances or housing needs. May be appropriate to accept a reduced marketing period or marketing may be unnecessary in light of local trends.	The policy does provide specifically for the needs of businesses for new premises and for the expansion and adaption of premises to meet changing needs. There is a need to maintain a critical mass of employment uses.
Developer/site promotor Barton Willmore on behalf of Syngenta (ID1564) consider Jealott's Hill should be included as a defined Employment Area.	Policy LP7 'Land at Jealott's Hill, Warfield' of the BFLP Revised Growth Strategy (2019) requires the whole Jealott's Hill site to be covered by a masterplan. In order not to prejudice this process, it has not been possible to define the exact extent of the Employment Area at Jealott's Hill.
Policy LP28 - Employment Development outside Employment Areas (Policy LP26 in BFLP Revised Growth Strategy 2019)	
Warfield Parish Council (ID689) consider section detailing unacceptable impacts needs further definition to ensure clarity.	It is not considered appropriate to include detailed criteria on unacceptable impacts within this policy. Issues such as noise and emissions are covered by separate legislation to planning and officers will take advice from relevant specialists when considering an application.
A resident considers that employment development outside employments areas should not be supported.	There are many businesses located outside of employment areas which may need to expand.
Policy LP29 - Smaller Businesses (Policy LP27 in BFLP Revised Growth Strategy 2019)	
Developer/site promotor Leigh (ID76) considers there is no justification in supporting text for the loss of smaller business threshold of 500sqm and no wording to allow for any exception.	The threshold of 500sq metres is considered appropriate as this would equate to office units accommodating up to 50 workers which is considered an appropriate level. However, for flexibility policy amended to include circumstances in which an exception might be permitted.

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LP32 - Changes of use within defined Retail Centres (Policy LP10 and LP29 in BFLP Revised Growth Strategy 2019)	
Developer/site promotor MRPP on behalf of Tesco Stores Ltd (in respect of store at The Meadows) (ID449/450/1320) recommend changing the retail hierarchy so has own policy, hierarchy is simplified to town, district and local centres and The Meadows is designated as a district centre.	Town centre hierarchy moved to separate policy (LP10 of BFLP Revised Growth Strategy (2019)). Policy amended to simplify the hierarchy to Primary Town Centre, District Centres and Local Centres. The Meadows retail area has been removed from the centre hierarchy.
Developer/site promotor Deloitte Real Estate for Bracknell Regeneration Partnership (The Lexicon) (ID874) requests that the Primary/secondary shopping frontage is extended to include the western elevation of unit 14 (McDonalds) and Benthalls Department Store (known as The Deck).	Policy amended so primary and secondary shop frontages are replaced by the 'primary shopping area' within the defined town centre, Bracknell town centre and the primary shopping re-defined so 'The Deck' is within the centre but outside of the primary shopping area.
Developer/site promoter Deloitte Real Estate for Bracknell Regeneration Partnership (The Lexicon) (ID876) considers the requirements for supporting evidence for changes to non-retail uses to be overly onerous and restrictive. Unreasonable to require an A1 unit within a primary shopping centre to potentially remain vacant for a minimum of a year.	It is not considered too onerous to require an A1 unit to be marketed for a reasonable period before a change of use is considered acceptable. There is significant scope for permitted development within town centres where this policy requirement would not apply.
Developer/site promoter Deloitte Real Estate for Bracknell Regeneration Partnership (The Lexicon) (ID876) request the requirement for non-A1 retail uses not to exceed 30% in primary shopping areas to be removed.	Policy amended to increase percentage threshold for Bracknell town centre's primary shopping area to 50% as Bracknell Town Centre serves a wider strategic function compared to the other town centres.
Policy LP33 - Advertisements and Shop Fronts (Policy LP41 in BFLP Revised Growth Strategy 2019)	
No main issues.	
Policy LP34 - Protection of community facilities and services (Policy LP31 in BFLP Revised Growth Strategy 2019)	

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Sport England (ID1045) objects to the Policy as it does not reflect Government guidance, as follows: bullet 3, if a sports facility is proposed to be lost, it can be replaced with another sports facility – not a different type of community facility. Paragraph 74 also does not allow applicants to demonstrate that sports facilities are surplus to requirements following a marketing period.	Amend to clarify that Policy LP32 of BFLP Revised Growth Strategy (2019), not this policy, deals with protection against the loss of open space and sports facilities.
Developer/site promoter Ministry of Defence (Defence Infrastructure Organisation, Environment & Planning) (ID768) should be made clear that does not apply to community facilities and services where these are ancillary to the main use of the land/buildings.	The NPPF does not distinguish those community facilities and services that are ancillary to the main use.
Policy LP35 - Protection and Enhancement of the Historic Environment (Policy LP42 in BFLP Revised Growth Strategy 2019)	
Historic England (ID784) Section A of the policy should refer to the significance of heritage assets. In paragraph 16.1.9 suggest that “conserved and enhanced” would be better than “preserved and enhanced”, as terminology more consistent with the NPPF.	Policy amended to reflect the NPPF guidance emphasis relating to significance and NPPF terminology.
Historic England (ID784) consider paragraph 16.1.10 confuses heritage interest and values and the definitions of non-designated heritage assets in the NPPF.	The definition of a non-designated heritage asset is not in the NPPF, it is in the still current PPG (2014). The PPG states that non-designated heritage assets are not formally designated heritage assets.
Historic England (ID784) consider paragraph 16.1.10 includes “Group and Townscape Value” and “Community Value” which are not considerations for identifying non-designated heritage assets.	Supporting text amended so the criteria are in a separate paragraph on the local list, to clarify that the criteria are for local listing.

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Historic England (ID784) would encourage an additional policy setting out the requirements of development proposals and providing a clear indication of how a decision maker should react to a development proposal affecting a heritage asset or assets as required by paragraph 154 of the NPPF.	How development proposals are to be assessed in terms of the historic environment is set out in the NPPF and in legislation and there is no need to repeat this. However, policy amended to refer to 'significance' of heritage assets.
Historic England (ID784) states should include criteria for assessing the potential impact of development proposals on the significance of all relevant designated heritage assets and identify those particular characteristics of each type of heritage asset that contribute to its significance and which therefore should be protected or enhanced.	It is considered that more detail would result in a long and less robust policy. The requirement for developers to address the heritage assets' significance is already required by the policy.
Historic England (ID784) states they do not consider the Plan to demonstrate an adequate positive strategy for the conservation and enjoyment of, or clear strategy for enhancing, the historic environment as required by the NPPF	The policy and supporting text set out the Council's clear strategy for the conservation and enhancement of the Borough's historic environment. Supporting text amended so the criteria for local listing are in a separate paragraph on the local list, to clarify that the criteria are for local listing, will further enhance the strategy.
Crowthorne Village Action Group (ID563) suggested amendment to part C of the policy to include a requirement to prepare and maintain a list of non-designated heritage assets.	The Council has adopted a Local List of Buildings and Structures and the supporting text will be amended to reflect this.
Developer/site promoter Leigh (ID77) considers parts B of the Policy and para. 16.1.9 are not consistent with NPPF as policy states any harm will automatically lead to a refusal of planning permission. Para. 133 of the NPPF refer to substantial harm or total loss, but consent could still be granted is there are substantial public benefits to outweigh	Supporting text amended to refer to substantial public benefit that outweighs the harm. Policy amended to delete part A and B and requires proposals affecting heritage assets to be determined in accordance with the NPPF.

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harm or loss. Also inconsistent with para. 134 of the NPPF as it says that where there is less than substantial harm, then that harm must be weighed against the public benefits of the proposal.	Policy amended to delete part A and B and requires proposals affecting heritage assets to be determined in accordance with the NPPF.
Developer/site promoter Leigh (ID77) considers Part B of the policy in conflict with paragraphs 133 and 134 of the NPPF. As enhancing the significance and legibility of an asset may be a public benefit, but not the only feasible one. The wording unreasonable constrains public benefits to just one aspect.	
Developer/site promoter Pegasus Group for the Whitaker Family (ID1498-1507), Bewley Homes (ID 1489) Part B of the policy makes reference is made to non-designated heritage assets being 'protected from harm'. This is overly restrictive, and conflicts with last sentence, which acknowledges that harm may occur. Needs to be consistent with para 135 of the NPPF on the matter, which refers to a balanced judgement being needed with regard to any harm.	
Developer/site promoter Pegasus Group for the Whitaker Family (ID1498-1507) consider part A of the policy requiring all development proposals to avoid harm, and the requirement for all proposals affecting heritage assets to have sympathetic design is overly restrictive.	
A number of developers/site promoters consider criteria A and B do not allow for the balancing of any harm to a designated asset's significance with a scheme's public benefits in line with paragraphs 133 and 134 of the NPPF and are overly restrictive.	

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Policy LP36 - Biodiversity (Policy LP43 in BFLP Revised Growth Strategy 2019)	
BBOWT (ID1215-1219) all developments must deliver a net gain in biodiversity than no net loss, and policy lacks any requirement for development proposals to quantify biodiversity net gain.	Policy amended to include net gain.
BBOWT (ID1215-1219) criterion iii) and para 17.1.8 not sufficient to ensure that new developments integrate biodiversity features.	Policy amended to strengthen wording.
BBOWT (ID1215-1219) the BFLP does not include a policy for the protection and enhancement of trees, woodlands, hedgerows and other wooded habitats.	A policy on trees and hedgerows is included in the BFLP Revised Growth Strategy (2019).
Policy LP37 - Designated Nature Conservation and Geological Sites (Policy LP44 in BFLP Revised Growth Strategy 2019)	
BBOWT (ID1215-1219) have suggested a number of detailed wording changes to accord with the NPPF.	Policy amended to reflect wording unless the suggestions are repeating the NPPF.
Policy LP38 – Green Infrastructure (Policy LP15 in BFLP Revised Growth Strategy 2019)	
Environment Agency (ID1267) recommends policy includes requirement for a 10m undeveloped area alongside main rivers.	Policy amended to include requirement for an 8m off-set from main rivers as 8m is the traditional off-set from the top of banks which would give a 16m overall corridor.
Policy LP39 – Thames Basin Heaths Special Protection Area (Policy LP16 in BFLP Revised Growth Strategy 2019)	
RSPB (ID1227) suggested a number of detailed wording changes to criterion i) regarding zones of influence; v)	Policy amended accordingly.

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regarding SANG guidelines and Strategic Access Management and Monitoring.	
Broadmoor Hospital (ID246) considers i) and v) are not consistent with requirements of Policy NRM6 of the South East Plan with regard to development within 400m from the SPA boundary and fails to recognise the application of the SANG standard applied regardless of scale and proximity.	Policy is considered consistent with Policy NRM6 of the South East Plan. The last sentence in v) 'Requirements may vary according to the type and size of the development and proximity to the SPA boundary' is intended to provide transparency to developers. However, it is considered that the amended policy already covers this issue and the final sentence in v. can be deleted.
Policy LP40 – Flood Risk (Policy LP17 in BFLP Revised Growth Strategy 2019)	
Environment Agency (ID1268) recommend that flood risk standards are set out, which could include the sequential approach, specifying height of finished floor levels, standards of flood mitigation in the form of flood compensation and requiring development in flood risk areas to provide an increase in flood storage.	The policy makes reference to the sequential approach. However, the policy has been amended to incorporate flood risk policy requirements specific to Bracknell Forest. However, it is not considered appropriate to specify the height of finished floor levels as these are likely to change when flood models and/or guidance are updated.
Environment Agency (ID1268) consider groundwater flooding should be covered in policy requirements.	Policy amended to make reference to all sources of flooding.
Environment Agency (ID1268) consider policy does not adequately reflect need to address impact of climate change.	Supporting text amended to refer to climate change.
Policy LP41 – Sustainable Drainage Systems (Policy LP48 in BFLP Revised Growth Strategy 2019)	
Environment Agency (ID1268) all new developments should use SUDs, not just those in areas prone to flooding.	Government policy currently states that SUDs provision is not mandatory for sites with less than 10 units. However, criterion i. does require SUDs in areas at risk of flooding.

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Policy LP42 – Addressing Climate Change through Renewable Energy and Sustainable Construction (Policy LP46 in BFLP Revised Growth Strategy 2019)	
Two Parish councils and developers/site promoters consider policy too vague, does not minimise fossil fuels, and should include a percentage.	Policy amended to require new residential development to reduce emissions. The use of renewable energy can be used to achieve this reduction.
Developers/site promoters Boyer for Bloor Homes Limited (ID928), Gladman (ID1017) and Persimmon Homes North London (ID1410) consider standards need to be tested through evidence base including viability and reflect optional technical standards.	The viability of policies will be tested in the Viability Assessment. It is considered that the policy reflects the optional technical standards and the NPPF which supports the transition to a low carbon future.
Developer/site promoter Barton Willmore on behalf of Harrison Housing (ID1053), and Willson Developments Ltd (ID962) consider reference to BREEAM should be removed.	It is considered the requirement is appropriate and is in accordance with the NPPF which supports the transition to a low carbon future. Policy amended to make it clearer that BREEAM can be required for non-residential development.
Policy LP43 – Pollution and Hazards (Policy LP49 in BFLP Revised Growth Strategy 2019)	
Natural England (ID120) should be acknowledged that noise and water pollution can also impact upon biodiversity and designated sites.	Supporting text amended to include reference to noise and water pollution and impact on biodiversity and designated sites.
Bracknell Forest Society (ID169) para 18.3.14, should also include reference to other water courses.	Supporting text amended to include watercourses.
A resident considers should include a dark skies policy.	There is no local evidence to support the inclusion of a dark skies policy.

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Sport England (ID1046) raised concerns that policy could result in it becoming more difficult to provide lighting or facilities.	It is considered that the policy does not make it difficult to provide lighting and the policy accords with Sport England's Guidance on this matter.
Policy LP44 – Development of Land Potentially affected by contamination (Policy LP50 in BFLP Revised Growth Strategy 2019)	
No main issues raised.	
Policy LP45 – Strategic Transport Principles (Policy LP13 in BFLP Revised Growth Strategy 2019)	
There are many comments from residents and Parish Councils regarding existing issues with the transport network and public transport provision.	Where additional traffic is predicted, the developer must demonstrate how they plan to mitigate such impacts through appropriate improvement measures such as highway capacity enhancements, supported bus services and pedestrian and cycle schemes. Further detailed schemes will also be developed as more detailed work on proposed sites progresses.
A number of developers/site promoters object as parking standards are not set out and policies uses the adopted Parking Standards SPD (2016).	The policy is strategic and there is a more detailed policy LP54 in BFLP Revised Growth Strategy (2019) which provide the necessary flexibility relating to localised evidence.
Policy LP46 – Assessing, Minimising and Mitigating the Transport Impacts of Development (Policy LP51 in BFLP Revised Growth Strategy 2019)	
Binfield Parish Council (ID293) needs to be quantifiable standards	The policy is strategic and the other transport policies provide further guidance for developments on topics such as travel planning, parking and infrastructure needs.
Comments from residents and Parish Councils regarding existing issues with the transport network and public transport provision.	Where additional traffic is predicted, the developer must demonstrate how they plan to mitigate such impacts through appropriate improvement measures such as highway capacity enhancements,

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	supported bus services and pedestrian and cycle schemes. Further detailed schemes will also be developed as more detailed work on proposed sites progresses.
Policy LP47 – Transport Infrastructure Provision (Policy LP52 in BFLP Revised Growth Strategy 2019)	
Crowthorne Village Action Group (ID565) consider criterion x should include electric vehicle charging points.	Bracknell Forest Council Parking Standards Supplementary Planning Document sets out the Provision for Electric Vehicle Charging.
A resident considers para. 19.3.2 ambiguous/ inconsistent with BFLP policies. Use of 'or' indicates financial contribution will be accepted if adverse impact cannot be mitigated. Questions if unmitigated adverse impact could be acceptable, so no alternative travel options provided and associated congestion/ pollution increases (contrary to aims of policy).	Supporting text amended to clarify that development mitigates its impact.
Policy LP48 – Travel Plans (Policy LP53 in BFLP Revised Growth Strategy 2019)	
Developer/site promoter Boyer Planning for JPP Land/Hodge Developments (ID848) considers travel plans not always appropriate. For residential development, where a Transport Assessment identifies that there is likely to be significant transport impacts, developers may contribute a financial sum per dwelling to allow the Council to implement Travel Plan initiatives for the site and surrounding area as an alternative.	Policy amended to include a financial contribution to implement travel plans.
Policy LP49 – Parking (Policy LP54 in BFLP Revised Growth Strategy 2019)	
A number of developers/site promoters state that policy does not set out standards, it uses the adopted Parking Standards	It is recognised that the Parking Standards SPD should be included for examination. However, supporting text has been amended to refer to the parking standards for clarity.

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SPD. Parking standards should not be established outside of the Plan.	
Policy LP50 – Play, Open Space and Sports Provision (Policy LP32 in BFLP Revised Growth Strategy 2019)	
Sport England (ID1040) do not support the use of standards, insufficient to protect playing fields and sports facilities; support dual use of sites	Open space standards have been successfully implemented and it is considered appropriate, it also provides certainty for developers as early as possible in the planning process. Policy has been amended to clarify the intention to protect playing fields and sports facilities and
A developer/site promotor considers requirements will need to be justified through evidence base and should recognise that there may be circumstances where existing open space, sports and recreational buildings and land, including playing fields may be redeveloped for an alternative use	The policies are justified by the evidence base including the Bracknell Forest Play Open Space and Sports Study (POSS) (CLP/Ev/4a) and Playing Pitch Strategy (CLP/Ev/4b) for Bracknell Forest. Supporting text amended to refer to any loss of open space of public value and facilities will need to be fully justified in line with the NPPF.
A number of developers/site promotor raised concern that the policy gives the impression that all development must provide for any play, open space and sporting needs it creates, yet LP51 states that residential development can provide financial contribution in lieu of on-site OSPV provision.	Policy amended to clarify that other types of development may also be required to provide open space.
Policy LP51 – Standards for Open Space of Public Value (Policy LP14 in BFLP Revised Growth Strategy 2019)	
Sport England (ID1041) do not support the use of standards in the policy or use of the Fields in Trust standard.	The Council has successfully implemented open space standards and it is the basis for the strategy going forward. Standards are also essential for other open space requirements (e.g. the Thames Basin

Draft BFLP (2018)	
Main Issues Raised	Council's Response
	<p>Heaths Special Protection Area mitigation). The use of standards also provides certainty for developers as early as possible in the planning process.</p> <p>The Fields in Trust standard is applicable for the accessibility for sports facilities. When the Council assessed the FIT standard against its own provision it is deemed to be applicable and relevant locally.</p>
<p>A developer/site promotor states that there is no evidence on the amount of OSPV (4.3ha per 1,000 population) proposed.</p> <p>There is no justification for the triggers and variations in the size of open space provided either by on-site or financial contribution.</p> <p>The amount of on and off-site provision is derived from previous standards of 30% on-site and 70% financial contributions in lieu of provision. This needs to be re-evaluated against up to date evidence and should allow more flexibility.</p> <p>The quality standard (Plus One Principle) is not considered to be up to date.</p>	<p>The amount of OSPV is justified by the evidence base including the Bracknell Forest POSS (CLP/Ev/4a) and is considered to be flexible.</p> <p>The triggers in Table 8 have been justified in the POSS (CLP/Ev/4a) as a result on local knowledge of development, open space and uses.</p> <p>The 30%/70% split was derived during the PPG17 audit which supported the Core Strategy and is also included in the Planning Obligations SPD (2015) and has been achieved without causing viability issues. If there is genuine evidence to say otherwise the Council can consider it as a material consideration.</p> <p>The Plus One Principle was developed in 2006 and applied using a tariff approach. It has been reassessed in the POSS (CLP/Ev/4a) study and is considered a relevant and appropriate method for improving the quality of OSPV to increase capacity.</p>

7. Further Consultation on New Sites (September 2018)

- 7.1. As the consultation on the Draft BFLP resulted in the submission of some new sites for consideration, further consultation was undertaken under Regulation 18 to gather representations from local residents and stakeholders in relation to new proposed housing allocations. The consultation documents are available to view on the Council's website¹¹.
- 7.2. A consultation statement setting out the consultation process and copies of the consultation material is available on the Council's website¹².
- 7.3. The consultation was in accordance with the SCI and ran for three weeks from Monday 3rd September 2018 to Monday 24th September 2018.

7.4. Who was consulted?

- 7.5. A large number of local residents and stakeholders, including statutory consultees were consulted including:
- Those living and working within the Borough;
 - Parish/Town Councils within the Borough;
 - Adjoining County, District and Borough Councils;
 - Specific consultees (such 'duty to co-operate' bodies and specific consultees, including Environment Agency, Natural England, Highways Agency and Historic England); and
 - General consultees (including voluntary bodies, bodies which represent the interests of different racial, ethnic or national groups, different religious groups, disabled persons, and persons carrying on a business in the Local Authority area).

7.6. How were they consulted?

- 7.7. A number of methods were used to consult on the draft Local Plan in order to ensure inclusive consultation as follows:

Method	Description
Make documents and supporting information available at Council offices and public libraries for inspection	<p>Hard copies of the main consultation document and supporting documentation (including non-technical leaflet in plain English) was also made available at the Council's Time Square office.</p> <p>Hard copies of the main consultation document and leaflets were deposited in local libraries (computer access, and thus access to the consultation portal</p>

¹¹ New sites consultation documents: <https://www.bracknell-forest.gov.uk/planning-and-building-control/planning/planning-policy/development-plan/draft-bracknell-forest-local-plan/draft-bracknell-forest-local-plan>

¹² Draft BFLP Consultation Statement: <https://www.bracknell-forest.gov.uk/planning-and-building-control/planning/planning-policy/development-plan/draft-bracknell-forest-local-plan/evidence-base>

Method	Description
	(Objective), was also available at local libraries).
Make documents, supporting information and electronic methods of responding available on the Council's website	<p>An online consultation event with the documents being consulted on and an online response form could be accessed using the online 'have your say' consultation portal (Objective). Those who were on the Planning Policy consultation portal database at the time, who had asked to be kept updated, were sent a notification informing them of the consultation and explaining how they could respond.</p> <p>The home page of the Council's website (including 'Consultations' page) and the Local Plan web page were used to advertise the consultation and a direct link was provided to the consultation event.</p>
Drop in sessions	<p>Exhibitions were held across the Borough at different locations, times and days in order to help optimise the accessibility of information to residents:</p> <ul style="list-style-type: none"> • Binfield Club on 12 September (4pm – 8pm)
Press releases to local newspapers	A press advert was placed in a local newspaper (Bracknell News).
Distribute information to Town and Parish Councils	Parish/Town Councils were formally notified and provided with hard copies of the consultation document and supporting documentation.
Stakeholder groups	Consultation with local voluntary and community groups via 'Involve' (a central support agency for over 600 voluntary and community action groups).
Letters and e-mails to contacts on address database	An email or a letter (sent to those without email addresses) was sent to consultees explaining the nature of the consultation and where information was available.
Other	A strap line was inserted into emails sent by staff in the Planning Section to advertise the consultation.

7.8. What were the main issues and how have they been taken into account?

7.9. A total of 55 comments were received. A detailed summary of responses to the Further Consultation on New Sites can be viewed on the Council's website¹³. The main issues raised during the consultation and how they have been taken into account are summarised in Table 3 below:

¹³ Summary of Responses (Main Issues) to Further Consultation on New Sites – Draft Bracknell Forest Local Plan: <https://www.bracknell-forest.gov.uk/planning-and-building-control/planning/planning-policy/development-plan/draft-bracknell-forest-local-plan/draft-bracknell-forest-local-plan>
Bracknell Forest Council
Interim Consultation Statement
(Version for Executive/Council March 2021)

Table 3: New Sites Consultation (2018) – Summary of Main Issues Raised

BFLP New Sites Consultation (2018)	
Main Issues Raised	Council's Response
Revised Policy LP3 – Sites allocated for residential/mixed use development (including new Sites BIN16 Land at 3M, Cain Road, Binfield; and Site BIN18/19 Land at Hewlett Packard, Cain Road, Binfield)	
A number of residents support the proposed allocations in preference to some of the greenfield sites proposed for allocation in the Draft BFLP (2018), especially when the lower housing need and buffer are taken into account.	No change required.
Opposition from residents to the proposed allocation on the grounds which include: lack of nearby services and facilities; increase in traffic; poor transport links; impact of construction; should be no more housing; out of scale with surrounding area; previous planning applications have been rejected; highway safety.	The Infrastructure Development Plan (IDP) details the necessary infrastructure for the potential sites for allocation to ensure sites are supported by the necessary infrastructure.
A number of developers/site promoters stated that BIN16, and BIN18/19 are within a defined employment area and should be retained.	BIN16 is not in employment use (previously in recreational use) and BIN18/19 is not proposed for allocation in BFLP Revised Growth Strategy (2019). Information on why BIN18/19 is an omission site and why BIN16 is proposed for allocation is set out in the Housing Background Paper.
Environment Agency (ID050) raised concerns about water quality and wastewater provision as there are constraints and new upgrades are required locally.	The Addendum to Water Cycle Study Phase 2 (CLP/Ev/4c) assessed the additional sites. All sites were found to have access to suitable water and wastewater supply capacity with upgrades to existing provision required and no significant constraints were identified.
Network Rail (ID015) raised that they are unaware of plans for a new train station (at BIN18/19) and close collaboration with Network Rail is required. They also stated that improvements may be required at Bracknell	BIN18/19 is not proposed for allocation in BFLP Revised Growth Strategy (2019). Information on why BIN18/19 is an omission site and is set out in the Housing Background Paper.

BFLP New Sites Consultation (2018)	
Main Issues Raised	Council's Response
station associated with additional patronage; this depends on the number of proposed residential units on the site at planning application stage.	
Royal Berkshire Fire and Rescue (ID011) raised concerns about lack of public water supply and emergency access requirements for BIN18/19.	
A number of developers/site promoters state that BIN16 and BIN18 site provides recreational land; therefore, future applications must provide open space and should not lead to an overall loss of open space / recreational land in the area.	<p>BIN18/19 is not proposed for allocation in BFLP Revised Growth Strategy (2019). Information on why BIN18/19 is an omission site is set out in the Housing Background Paper.</p> <p>The existing recreational facilities at BIN16 were originally re-provided at the Farley Wood Centre as part of the project to locate the offices in the wider site which satisfies the requirements of the NPPF para 97. For further information see the Housing Background Paper.</p>
Developers/site promoters raised concerns about the viability and deliverability of BIN18/19 due to remediation of landfill.	BIN18/19 is not proposed for allocation in the BFLP Revised Growth Strategy (2019). Information on why BIN18/19 is an omission site is set out in the Housing Background Paper.
Policy LPX - Land at Hewlett Packard, Cain Road, Binfield (BIN18/19)	
Opposition from residents to the proposed allocation on the grounds which include: lack of nearby services and facilities; increase in traffic; poor transport links; impact of construction; should be no more housing; out of scale with surrounding area; previous planning applications have been rejected; highway safety, impact on wildlife and Thames Basin Heaths Special Protection Area (TBHSPA).	BIN18/19 is not proposed for allocation in the BFLP Revised Growth Strategy (2019). Information on why BIN18/19 is an omission site and is set out in the Housing Background Paper.

BFLP New Sites Consultation (2018)	
Main Issues Raised	Council's Response
CBRE Group on behalf of Hewlett Packard Enterprise (ID021) suggested amendments to the policy including removal of the figure for affordable housing, should be clear capacity dependent on further work, all development should be on previously developed site and some points considered to duplicate requirements are not necessary.	
Thames Water (ID035) raised concerns that the scale of this development is likely to require upgrades to the wastewater network and treatment works.	
A number of developers stated the site (BIN18/19) is within a defined employment area and should be retained.	

8. Revised Growth Strategy Consultation (October – December 2019)

- 8.1. Following earlier consultations, a number of factors resulted in the Council deciding to carry out further Regulation 18 consultation. These included:
- i. The Government published a revised NPPF (July 2018) and an amended version in February 2019. The supporting Planning Practice Guidance had also been updated. The updated framework and guidance required an altered approach, including a clear distinction between strategic and non-strategic policies and an amended Local Housing Need (LHN) figure.
 - ii. Comments received during previous consultations and further technical work indicating the need for an alternative approach.
 - iii. In view of the increased need to respond to climate change, the document was revised to clarify those policies that are concerned with adaptation and mitigation.
 - iv. The need to extend the period covered by the Plan to 2036 to meet the required 15 year plan period.
 - v. The need for investment in a research facility (Syngenta) at Jealott's Hill resulting in a proposal for a sustainable mixed-use development based on garden settlement principles.
- 8.2. The document was in 2 parts and the consultation focused on Part 1 (strategic policies) which included the strategic policies concerned with meeting the growth needs of the area and proposed site allocations to meet the need.
- 8.3. Part 2 (Development Management policies) was also made available for comment. The policies had been consulted on in the previous Draft Bracknell Local Plan (2018), however, they were updated in response to comments and the revised NPPF and Planning Practice Guidance.
- 8.4. Further to the Local Plan documents, supporting documentation, including the Draft SA, Draft HRA, Draft Housing Background Paper, and the Draft Policies Map were also made available for comment. The consultation documents are available to view on the Council's website¹⁴.
- 8.5. Consultation was carried out in accordance with the SCI and a consultation strategy and mandate was prepared. The consultation took place over a six-week period between 25th October and 6th December 2019.
- 8.6. Who was consulted?**
- 8.7. A large number of local residents and stakeholders, including statutory consultees were consulted including:
- Those living and working within the Borough;

¹⁴ Revised Growth Strategy consultation documents: <https://www.bracknell-forest.gov.uk/planning-and-building-control/planning/planning-policy/development-plan/draft-bracknell-forest-local-plan/draft-bracknell-forest-local-plan>

- Parish/Town Councils within the Borough;
- Adjoining County, District and Borough Councils;
- Specific consultees (such 'duty to co-operate' bodies and specific consultees, including Environment Agency, Natural England, Highways Agency and Historic England); and
- General consultees (including voluntary bodies, bodies which represent the interests of different racial, ethnic or national groups, different religious groups, disabled persons, and persons carrying on a business in the Local Authority area).

8.8. How were they consulted?

8.9. A number of methods were used to consult on the draft Local Plan in order to ensure inclusive consultation as follows:

Method	Description
Make documents and supporting information available at Council offices and public libraries for inspection	<p>Hard copies of the main consultation document and supporting documentation (including non-technical leaflet in plain English) was also made available at the Council's Time Square office.</p> <p>Hard copies of the main consultation document and leaflets were deposited in local libraries (computer access, and thus access to the consultation portal (Objective), was also available at local libraries).</p>
Make documents, supporting information and electronic methods of responding available on the Council's website	<p>An online consultation event with the documents being consulted on and an online response form could be accessed using the online 'have your say' consultation portal (Objective). Those who were on the Planning Policy consultation portal database at the time, who had asked to be kept updated, were sent a notification informing them of the consultation and explaining how they could respond.</p> <p>The home page of the Council's website (including 'Consultations' page) and the Local Plan web page were used to advertise the consultation and a direct link was provided to the consultation event.</p>
Drop in sessions	<p>Exhibitions were held across the Borough at different locations, times and days in order to help optimise the accessibility of information to residents:</p> <ul style="list-style-type: none"> • Warfield at Brownlow Memorial Hall on 6 November (2pm – 6pm) • Binfield Club on 12 November (4pm – 8pm).

Method	Description
	<ul style="list-style-type: none"> • Bracknell town centre at Easthampstead House on 13 November (2pm – 8pm). • Crowthorne at Morgan Centre on 21 November (5pm – 7pm) • Warfield at The Westmorland Park Pavillion on 28 November (4:30pm – 7:30pm). Crowthorne Library on 6 March (10am – 1pm and 5pm – 8pm).
Press releases to local newspapers	<p>A press release was sent to local newspapers/radio stations at the start of the consultation.</p> <p>A press advert was placed in a local newspaper (Bracknell News).</p>
Social media	Information was posted on the Council's social media accounts (Facebook and Twitter) throughout the consultation period.
Distribute information to Town and Parish Councils	<p>A meeting was held with Parish and Town Councils prior to the start of the consultation to advise of the nature of the consultation.</p> <p>Parish/Town Councils were formally notified and provided with hard copies of the consultation document and supporting documentation.</p>
Stakeholder groups	<p>The Economic Skills Development Partnership and Land Agents group were both informed of the consultation through presentations.</p> <p>Consultation with local voluntary and community groups via 'Involve' (a central support agency for over 600 voluntary and community action groups).</p> <p>Consultation with the Council's Access Group.</p>
Letters and e-mails to contacts on address database	An email or a letter (sent to those without email addresses) was sent to consultees explaining the nature of the consultation and where information was available.
Neighbour notification to properties	Notification of the consultation via a letter sent to properties around clusters of proposed site allocations.
Other	A strap line was inserted into emails sent by staff in the Planning Section to advertise the consultation.

Method	Description
	An article was placed on the Council's intranet (Boris/Doris), under staff news, to help raise awareness amongst officers.

8.10. What were the main issues and how have they been taken into account?

8.11. A total of 1,025 comments were received. A detailed summary of responses to the Revised Growth Strategy can be viewed on the Council's website¹⁵. An informal consultation was held in March 2020 inviting comments on accuracy on the summary of responses and some edits were subsequently made. A summary of the main issues raised and how they have been taken into account are detailed in Table 4 below.

¹⁵ Summary of responses to the Consultation on the Revised Growth Strategy and Development Management Policies: <https://www.bracknell-forest.gov.uk/planning-and-building-control/planning/planning-policy/development-plan/draft-bracknell-forest-local-plan/draft-bracknell-forest-local-plan>

Table 4: BFLP Revised Growth Strategy (2019) Consultation - Summary of Main Issues Raised

BFLP Revised Growth Strategy (2019)	
Main Issues Raised	Council's Response
Chapter 1: Introduction	
A resident and a number of developers/site promoters consider the plan period should be extended to 2036 or 2037.	Plan period extended to 2037.
Developer/site promotor Nexus Planning on behalf of Kingacre Estates (ID566) consider the LHN is too low to support economic growth and fails to take into account need from strategic infrastructure delivery.	The PPG (ID 2a-010-20190220) deals with situations where it might be appropriate to plan for a higher housing need figure than the standard method indicates. None of these currently apply.
Developer/site promotor Pegasus on behalf of Persimmon Homes Thames Valley and Jaynic Ltd (ID1013) consider LHN figure to be incorrect and sites proposed for allocation insufficient to meet development needs.	Correct LHN used as at 1st April 2020. Sufficient sites have been allocated to meet the provision in Policy LP3.
Chapter 3: Vision and Objectives	
Historic England (ID452) consider the vision relates to development and its impacts, rather than the conservation and enhancement of the historic environment and doesn't reflect the positive value of the historic environment. Incorrect to express the protection and enhancement of the historic environment as dependent on meeting development needs	Vision amended to refer to the safeguarding of heritage assets – text not linked to meeting development needs.
The Environment Agency (ID946) considers objective B under values the natural environment as still states 'commensurate with meeting our development needs'.	Objective B amended to delete reference to 'commensurate with meeting our development needs'.

BFLP Revised Growth Strategy (2019)	
Main Issues Raised	Council's Response
The Environment Agency (ID946) considers Objective I does not make it clear that Green Infrastructure include watercourse (blue infrastructure).	Objective I amended to include blue infrastructure.
The Woodland Trust (ID782) should add woodland and ancient woodland to objective B.	Objective B amended to include woodland.
A number of residents and developers/site promoters raised objections against Objective C (Jealott's Hill) and made comments in relating to Jealott's Hill.	This matter is dealt with under the responses to Policy LP7.
The Woodland Trust (ID782) should add 'built and natural environment' to Objective G.	Objective G amended to add built and natural environment.
A developer/site promotor (Hawksbury Homes ID503) suggests vision and Objective D should refer to older persons accommodation.	Objective D: all identified needs includes older people – not appropriate to name them specifically.
Thames Valley Chamber of Commerce and Industry (ID826) considers the vision should have a stronger economic focus.	The Vision refers to sustainable growth and Objective C refers to the need to make sites and buildings available, supported by high quality infrastructure.
Developer/site promotor Syngenta (ID674) consider the vision should be amended to make specific reference to Syngenta and Objective C should be changed to include a description of the business.	<p>Development of a sustainable village at Jealott's Hill is referred to in the vision. Not appropriate to mention a specific company or provide background in this section.</p> <p>Not appropriate to expand Objective C to include description of business.</p>
Chapter 4: Spatial Strategy	

BFLP Revised Growth Strategy (2019)	
Main Issues Raised	Council's Response
Environment Agency (ID947) considers the Key Constraints Map should include rivers other important habitat sites such as SSSIs and rivers.	The map shows the key constraints that influence the location of development in Bracknell Forest. It is accepted that it is not comprehensive.
Royal Borough Windsor and Maidenhead (ID880) raise concerns about Jealott's Hill and promotion of development sites to the north and east of Bracknell in the Green Belt which would reduce the gap between towns of Ascot and Bracknell.	These matters have been discussed further through the Duty to Cooperate. See Draft Interim Duty to Cooperate Statement (LP/Ev/10q)
A resident considers compensatory measures needed for loss of Green Belt and other areas should be considered for inclusion.	Compensatory measures are being developed further through the master planning and design stages.
A number of residents and developer/site promoters consider Jealott's Hill is contrary to the spatial strategy, no evidence to support exceptional circumstances, no justification for enabling development, not considered all reasonable options, not appropriate/sustainable location, negative environmental impacts, housing need has been met.	<p>Spatial Strategy amended so approach is explained on an area by area basis.</p> <p>Further evidence on 'exceptional circumstances' is set out in the Exceptional Circumstances Background Paper and further evidence has been made available on the economic and financial case concerned with development at Jealott's Hill.</p> <p>Any development will be expected to provide infrastructure commensurate with its scale. It is recognised that significant improvements to infrastructure are required and further work is being undertaken on this matter.</p> <p>The housing is now helping to meet the housing provision.</p>
Developer/site promoters Schyde (ID354) consider para 4.10 (concerned with main town centre uses) should include Moss End Garden Centre and the proposed local Centre at Jealott's Hill should not duplicate Moss End.	Do not consider Moss End to meet the definition of a Town Centre set out in the Glossary to the NPPF. Other than via the Use Class Order, the Council has little influence over who might occupy any units provided.

BFLP Revised Growth Strategy (2019)	
Main Issues Raised	Council's Response
Opposition from residents to the proposed allocation on the following grounds: Hawksbury Homes (ID504) consider more clarity on where specialist housing would be acceptable, more clarity needed on role of smaller settlements and all settlements defined in LP2 should be referred to in the spatial strategy and key diagram.	Spatial Strategy amended so approach is explained on an area by area basis. Further detail on needs for different forms of residential development is set out in section 6. It is not considered necessary to define a settlement hierarchy in policy.
Developer/site promotor Turley on behalf of Berkeley Strategic Land Ltd (ID565) raised concerns that directing development to Bracknell Town Centre may fail to meet the needs of a range of household. Proposed allocations do not reflect growth that can be achieved in Sandhurst.	Spatial Strategy amended so approach is explained on an area by area basis. The plan seeks to focus development on Bracknell as the most sustainable settlement plus a new sustainable settlement at Jealott's Hill. Other sites that are being allocated plus outstanding commitments will also help cater for a full range of housing needs
Developer/site promotor Persimmon/Souter (ID890) consider that sites being proposed for allocation fail to reflect approach set out in para 4.7.	Sites that are being proposed for allocation follow the approach set out in the Spatial Strategy as a whole.
Developer/site promotor Turley on behalf of Bloor Homes (ID601) considers that the spatial strategy does not identify a settlement hierarchy and no robust rationale for spatial strategy in current form. Plan seeks to concentrate most growth in Bracknell, failing to consider how sustainable development can/ should be delivered in other sustainable settlements in borough. Not justified or consistent with national policy.	Spatial Strategy amended so approach is explained on an area by area basis. It is not considered necessary to define a settlement hierarchy. Deliverable and developable sites are being allocated in Sandhurst to meet local needs.
Developer/site promotor Pegasus on behalf of Persimmon Homes Thames Valley and Jaynic Ltd (ID1015) consider OAN has been incorrectly calculated and underestimated scale of growth required.	Correct LHN used as at 1st April 2020. Sufficient sites have been allocated to meet the need.

BFLP Revised Growth Strategy (2019)	
Main Issues Raised	Council's Response
Chapter 5: LP1 Sustainable Development Principles	
Environment Agency (ID948) concerned that policy does not include river corridors within green infrastructure networks.	Amend glossary to make clear green infrastructure includes watercourses (blue infrastructure).
Environment Agency (ID948) paragraph 5.5 should include the provision of wastewater infrastructure and final bullet should be reworded more positively.	Amend supporting text paragraph 5.5 to include provision of wastewater infrastructure and bullet 9 amended to include net gain in biodiversity.
Woodlands Trust (ID786) concerned that policy does not refer to biodiversity net gain.	Amend supporting text para 5.5 bullet 9 to include a net gain in biodiversity.
Berkshire Gardens Trust (ID702) should include historic landscapes.	Supporting text para 5.5 refers to historic interest which is considered to cover this.
Developer/site promotor Gladman (ID708) consider policy inconsistent with the NPPF's approach to applying the presumption in favour of sustainable development	The NPPF seeks sustainable development which means that the economic, social and environmental objectives should be pursued in mutually supportive ways (para 8 of NPPF).
Chapter 5: LP2 Sustainable Locational Principles	
Environment Agency (ID948) concerned that environmental constraints are not listed.	Covered by other policies in the BFLP.
Developer/site promotor Landsec (ID727) policy could be amended to include a hierarchy of sustainable development locations.	Due to the nature of the defined settlements in Bracknell Forest, it is not considered necessary to set out a hierarchy in policy. Locational principles are set out in Policy LP1.
Developer/site promotor Gladman (ID705) consider policy should be criteria based to provide flexibility should allocated sites not come forward as expected.	The policy is considered to be clear and directs development to the defined settlements including within the developable areas of allocated sites.

BFLP Revised Growth Strategy (2019)	
Main Issues Raised	Council's Response
Developers/site promotor Richardson (ID736) consider the development should be allowed outside settlements	There is a need to protect the countryside from unnecessary or inappropriate development, however, it is recognised that development may be required, and this is covered by criteria based policies in the BFLP.
Developer/site promotor Pegasus on behalf of Redrow Homes and Persimmon Homes Thames Valley (ID632) consider 'developable area' is unnecessary and should be deleted.	Developable areas have been defined to take account of constraints and evidence in calculating the approximate capacity of sites. They are also used as the basis for defining extensions to settlements where appropriate. It is accepted that these may need to be amended in a subsequent review of the BFLP, depending on the extent of the built development agreed.
Developer/site promotor Turley on behalf of Berkeley Strategic Land Ltd (ID565) consider policy not flexible, does not respond to changing market conditions.	Flexibility is included and there is a legal requirement to review local plans every 5 years, to take account of any changes in circumstances.
Chapter 6.1: LP3 Provision of Housing	
Royal Borough of Windsor and Maidenhead (ID881) considers Jealott's Hill is a significant over-provision of housing and employment within the borough relative to agreed needs and targets.	<p>The proposal at Jealott's Hill is based on exceptional circumstances. Further evidence on exceptional circumstances is set out in the Exceptional Circumstances Background Paper.</p> <p>The housing and employment floorspace are helping to meet the housing provision in the Pre-Submission BFLP (2021).</p>
<p>A number of developers/site promoters have raised concerns regarding the housing requirement including:</p> <ul style="list-style-type: none"> Housing requirement not sufficiently flexible to allow for changing circumstances. Housing need is higher than the standard method used in the plan due to planned economic growth (including Heathrow expansion and local business needs). 	<ul style="list-style-type: none"> Flexibility is built into the Plan and delivery has improved over recent years as is demonstrated by the Housing Delivery Test (February 2020). The Planning Practice Guidance provides the following examples of when it might be appropriate to plan for a higher housing figure. None of those are applicable to Bracknell Forest.

BFLP Revised Growth Strategy (2019)	
Main Issues Raised	Council's Response
<ul style="list-style-type: none"> Objectively assessed need in the SHMA is higher. High affordable housing need, Not a significant boost to housing supply. No allowance has been made to meet unmet need from neighbouring authorities/ authorities in the housing market area or London Authorities. 	<ul style="list-style-type: none"> The housing requirement should be based on the standard method as set out in national policy. The housing requirements set out in the SHMA are no longer relevant. Not realistic to aim to meet the need for affordable housing in full due to the amount of market housing that would need to be provided and the operation of the housing market. However, the affordable housing policy amended to increase the percentage sought and lower the site threshold. Discussions have taken place on the issue of unmet housing needs. Discussions on how any unmet needs from London are not at a sufficiently advanced stage to include a figure in this Plan.
<p>Wokingham Borough Council (ID373) and a number of developers/site promoters have raised concerns regarding the housing supply including:</p> <ul style="list-style-type: none"> The 10% flexibility allowance is too low/should be applied to an extended plan period (2019-2037). Identified permissions, allowances and allocations should form part of identified supply rather than reducing need and 10% flexibility allowance applied to overall need figure. The windfall allowance is excessive and medium allowance should not be included especially since majority of sites had come forward in designated employment areas now covered by Article 4 direction. Reliance on existing commitments and questions deliverability especially of SALP sites that have not yet come forward No allowance has been made for the non-implementation of extant schemes with planning permission 	<ul style="list-style-type: none"> The flexibility allowance in the Pre-Submission BFLP (2021) has changed (10% of the overall LHN has been taken rather than 10% of the residual remaining to be allocated) and plan period has been extended to 2037. The windfall allowance is based on historic evidence and includes discounted assumptions where it is believed that sources of supply may reduce. Historic data shows that a stream of medium sites become available during a plan period for unforeseeable reasons. The majority of prior approvals for change of use from offices to residential have occurred on land outside the Designated Employment Areas that are covered by the Article 4 Direction. However, the Council has taken a precautionary approach as this source may not continue to deliver at current rates, therefore only 50% of completions through prior approvals for small and medium sites have been included.

BFLP Revised Growth Strategy (2019)	
Main Issues Raised	Council's Response
<ul style="list-style-type: none"> • No certainty Neighbourhood Plan site will be delivered. • Not considered any shortfall accrued during the Core Strategy plan period. • Proposed allocations on Jealott's Hill (LP7) and Derby Field (LP6) should be omitted from the supply, as the allocations are unsound. 	<ul style="list-style-type: none"> • The deliverability of outstanding SALP allocations has been re-assessed and checked as part of the commitments calculations • Historic data suggests that there is a high implementation rate of permissions granted in Bracknell Forest. • No reliance is now placed on the allocation within the Warfield Neighbourhood Plan to meet the LHN. • The affordability adjustment is applied to take account of any past under delivery. • All sites in the SHELAA have been assessed and those that are considered to be deliverable and developable are proposed. The reasons for omitting omission sites are set out in the Housing Background Paper.
A number of developers/site promoters consider the plan period should extend to 2036 or 2037.	Plan period has been extended to 2037 in the Pre-Submission BFLP (2021).
LP4 Sites allocated for residential/mixed use development (general comments)	
Historic England (ID454) and a developer/site promotor considers that all allocations should have policy requirements rather than separate site profiles (Appendix 4).	The policy requirements are aimed at setting out site specific conditions relating to how specific pieces of land should be used or treated where there are complex infrastructure requirements and constraints.
A number of residents raised objections to the proposed allocations on the following grounds: pressure on facilities and services, cumulative impact, loss of gap, flood risk, impact on SPA.	Information on why the sites are considered appropriate for allocation is set out in the Housing Background Paper which summarises the more detailed topic based evidence studies. The infrastructure requirements associated with the development of the sites are detailed in the Infrastructure Delivery Plan (IDP).

BFLP Revised Growth Strategy (2019)	
Main Issues Raised	Council's Response
A number of developer/site promoters considers that additional sites are needed for flexibility.	The BFLP includes sufficient sites to meet the LHN plus some flexibility.
LP4 Sites allocated for residential/mixed use development (BIN1 Tilehurst Lane)	
The site has outline planning permission for 40 dwellings, granted on appeal October 2019 (reference: 17/01174/OUT) therefore the site is not proposed for allocation, as it is now a commitment.	
LP4 Sites allocated for residential/mixed use development (BIN5 Land South of Forest Road and East of Cheney Close)	
Historic England (ID454) consider archaeological investigation may be required.	Site profiles (Appendix 4) amended to include archaeological investigations.
Binfield Parish Council (ID517/518) and a number of residents objected to the allocation on a number of grounds including: increased traffic/pollution, pressure on services and facilities, loss of heritage, over development, loss of gap/open space, loss of protected trees, risk of flooding/subsidence, more sustainable alternative sites.	Information on why the site is considered appropriate for allocation is set out in the Housing Background Paper which summarises the more detailed topic based evidence studies. The infrastructure requirements associated with the development of the sites are detailed in the Infrastructure Delivery Plan (IDP).
LP4 Sites allocated for residential/mixed use development (BIN10 Popes Manor Murrell Hill Lane)	
Historic England (ID454), Binfield Parish Council (517/518), a developer/site promotor and a number of residents consider that the allocation of the site would be contrary to the NPPF, as it would result in harm to a designated asset, with no clear/convincing justification. If the lane requires upgrading to accommodate development to the western part of the site, to the extent it would have a suburbanising effect, and negatively impact the setting of Pope's Manor, the entire site should not be allocated.	Due to potential negative effects on a heritage asset (Popes Manor, Grade II listed), and its settings, the site has been reduced in size to exclude the parcel of land to the east of Murrell Hill Lane (BIN10a) which includes Popes Manor.

BFLP Revised Growth Strategy (2019)	
Main Issues Raised	Council's Response
A number of residents objected to the allocation on a number of grounds including: over development, increased pollution/traffic, more sustainable alternative sites, loss of open space, pressure on facilities, impact on wildlife, risk of flooding and subsidence.	Information on why the site is considered appropriate for allocation is set out in the Housing Background Paper which summarises the more detailed topic-based evidence studies. The infrastructure requirements associated with the development of the sites are detailed in the Infrastructure Delivery Plan (IDP).
LP4 Sites allocated for residential/mixed use development (BIN12 Land South of London Road (Eastern Field))	
Historic England (454) consider archaeological investigation may be required.	Site profiles (Appendix 4) amended to include archaeological investigations.
LP4 Sites allocated for residential/mixed use development (BIN16 Land between Cain Road and Turnpike Rd (3M Rec Land))	
Historic England (ID454) consider archaeological investigation may be required.	Site profiles (Appendix 4) amended to include archaeological investigations.
LP4 Sites allocated for residential/mixed use development (BIN20 Land Previously reserved for Park & Ride Peacock Farm)	
Historic England (ID454) consider a site assessment of the site is required as it is not included in the Bracknell Forest Historic Environment Assessment of sites (LP/Ev/7b).	The undeveloped area in the vicinity of the Listed Buildings was allocated through the Site Allocations Local Plan therefore the principle of development is established. The remaining part of the site is separated from the listed buildings by development. Accordingly, it is not considered necessary to undertake a full assessment of the site prior to allocation.
Promotor of site Pegasus on behalf of Redrow Homes and Persimmon Homes Thames Valley (ID632) consider site has capacity for more dwellings (200-230) and the developable area should not be set in the Local Plan.	The potential site capacity has been reviewed and has been increased to 100 dwellings (in addition to the capacity at the eastern end of the site allocated through Policy SA2 of the SALP). It is not considered the site could accommodate the suggested 200 – 230 dwelling capacity owing to constraints on the site. In order to inform estimated capacities on sites to demonstrate the

BFLP Revised Growth Strategy (2019)	
Main Issues Raised	Council's Response
	Local Plan can meet identified housing needs, the Local Plan establishes indicative development areas taking into account constraints.
Promotor of site Pegasus on behalf of Redrow Homes and Persimmon Homes Thames Valley (ID632) consider requirement to not harm setting of nearby listed buildings is inconsistent with NPPF.	Bullet point concerned with heritage in the site profile (Appendix 4) deleted.
LP4 Sites allocated for residential/mixed use development (BRA7 Town Square The Ring)	
Historic England (ID454) consider archaeological investigation may be required.	Site profiles (Appendix 4) amended to include archaeological investigations.
LP4 Sites allocated for residential/mixed use development (BRA12 Former Bus Depot, Market Street)	
Historic England (ID454) consider archaeological investigation may be required.	Site profiles (Appendix 4) amended to include archaeological investigations.
Site /developer Savills on behalf of Morgan Sindall Investments (ID751) consider density should be higher.	The density is considered appropriate. Further details on the proposed density is available in the Housing Background Paper.
LP4 Sites allocated for residential/mixed use development (BRA13 Coopers Hill, Crowthorne Road North)	
Historic England (ID454) consider archaeological investigation may be required.	Site profiles (Appendix 4) amended to include archaeological investigations.
Site promotor Savills on behalf of Morgan Sindall Investments (ID751) consider density should be higher.	The density is considered appropriate. Further details on the proposed density is available in the Housing Background Paper.

BFLP Revised Growth Strategy (2019)	
Main Issues Raised	Council's Response
LP4 Sites allocated for residential/mixed use development (BRA14 Jubilee Gardens The Ring)	
Historic England (ID454) consider archaeological investigation may be required.	Site profiles (Appendix 4) amended to include archaeological investigations.
Site promotor Savills on behalf of Morgan Sindall Investments (ID751) consider density should be higher.	The density is considered appropriate. Further details on the proposed density is available in the Housing Background Paper.
LP4 Sites allocated for residential/mixed use development (BRA15 Land E of Station Way and N of Church Road (Southern Gateway))	
Historic England (ID454) consider archaeological investigation may be required.	Site profiles (Appendix 4) amended to include archaeological investigations.
LP4 Sites allocated for residential/mixed use development (BRA17 Bus Station, Station Road)	
Historic England (ID454) consider a site assessment of the site is required as it is not included in the Bracknell Forest Historic Environment Assessment of sites (LP/Ev/7b).	It is not considered necessary to undertake a full assessment of the site prior to allocation. However, the site profiles (Appendix 4) amended to include archaeological investigations.
LP4 Sites allocated for residential/mixed use development (SAND9 Land at Lower Church Road)	
Historic England (454) recommends wording changes to Appendix 4 site profiles to be in accordance with the NPPF.	Appendix 4 site profiles amended to accord with the NPPF.
Environment Agency (ID949) the site is partly located in Flood Zones 2 and 3. This site must pass the Sequential and Exception Tests. The draft Sequential Test and Exception Test (October 2019) states that the site 'passes the sequential test as identified development needs cannot be accommodated on sequentially preferable sites. Table 1b of the Sequential Test states that	<p>Draft Sequential Test and Exception Test (LP/Ev/9g) amended to include an explanation of why the Green Belt outweighs flood risk in Bracknell Forest.</p> <p>Only a small portion of the site is located within Flood Zones 2 and 3. It is possible to locate development sequentially</p>

BFLP Revised Growth Strategy (2019)	
Main Issues Raised	Council's Response
various sites have not been allocated in Flood Zone 1 as they are 'located within the Green Belt and 'exceptional circumstances' have not been evidenced'. Need to justify why the Green Belt outweighs flood risk.	
Sandhurst Parish Council (ID043) and a resident concerned about impact on transport network and highway safety.	The developer would need to demonstrate its impact both in terms of vehicles and highway safety and provide detail of any mitigation measures in their accompanying transport assessment.
LP4 Sites allocated for residential/mixed use development (WAR9 Land North of Herschel Grange)	
Historic England (ID454) consider archaeological investigation may be required.	Site profiles (Appendix 4) amended to include archaeological investigations.
Warfield Parish Council (ID531, 551 & 553) and a number of residents object to the proposed allocation on grounds including: adverse impact on character/urbanising effect, adverse impact heritage assets, overdevelopment, loss of biodiversity, impact on SPA, loss of gap, impact on facilities and services, additional traffic and highway safety, not a sustainable location, other sites more suitable, not required to meet housing need.	Information on why the site is considered appropriate for allocation is set out in the Housing Background Paper which summarises the more detailed topic-based evidence studies. The infrastructure requirements associated with the development of the sites are detailed in the Infrastructure Delivery Plan (IDP). A planning application for 33 dwellings on this site (ref: 19/00497/FUL) has been approved, subject to the completion of a Section106 agreement.
LP4 Sites allocated for residential/mixed use development (WINK15 Whitegates, Mushroom Castle)	
Historic England (ID454) consider archaeological investigation may be required.	Site profiles (Appendix 4) amended to include archaeological investigations.
Winkfield Parish Council (ID 897) and a number of residents object to the proposed allocation on grounds including: adverse impact	Information on why the site is considered appropriate for allocation is set out in the Housing Background Paper which summarises the

BFLP Revised Growth Strategy (2019)	
Main Issues Raised	Council's Response
on character, loss of biodiversity, fragmentation of woodland, loss of ancient woodland increased narrow access, pressure on highways, impact on facilities and services including drainage, unsustainable location, loss of gap/greenspace, adverse impact on existing residents, cumulative impact with other developments. No retail or leisure planned and no details of employment or community gain.	more detailed topic-based evidence studies. The infrastructure requirements associated with the development of the sites are detailed in the Infrastructure Delivery Plan (IDP).
LP4 Sites allocated for residential/mixed use development (WINK34 Land read of Forest View and Oriana, Long Hill Rd and West of Fern Bungalow, London Rd) SALP SA3 extension)	
Historic England (ID454) consider archaeological investigation may be required.	Site profiles (Appendix 4) amended to include archaeological investigations.
LP4 Sites allocated for residential/mixed use development (Land at Hayley Green – Warfield Neighbourhood Plan site)	
Environment Agency (ID949) site is partly in flood zone and must pass Sequential and Exception Tests. No evidence that it has. Also unclear if included in housing figures.	The site is not allocated for development in the Pre-Submission BFLP (2021) and any dwellings developed on the site will be in addition to those in the BFLP.
Wokingham Borough Council (ID369) concerned site not deliverable and if removed will not be able to meet housing need.	
Winkfield Parish Council (ID897) and residents raised concerns and objections against its inclusion	
A number of developers/site promoters object the site and consider alternative sites should be allocated.	
LP4 Sites allocated for residential/mixed use development (omission sites and new sites)	

BFLP Revised Growth Strategy (2019)	
Main Issues Raised	Council's Response
BIN6 – land south of Emmets Park and east of Cressex Close Developer/Site promotor Boyer on behalf of Bloor Homes Ltd (ID886) considers the site is available, suitable and deliverable.	The site has been assessed and is considered to be less suitable for development than other sites that are proposed for allocation. Detailed information on why it is an omission site are set out in the Housing Background Paper.
Wyevale Garden Centre, Forest Road (BIN4) Developer/Site promotor Spitfire Bespoke Homes Ltd (ID655) considers the site is available, suitable and deliverable.	Planning permission 20/00155/FUL granted Aug 2020 for erection of 20 no. dwellings with associated landscaping, open space and car parking following the demolition of existing buildings.
Land linking BIN5 and BIN6 (new site) Developer/Site promotor Boyer on behalf of Bloor Homes Ltd (ID886) considers the additional land between BIN5 and BIN6 would mean a single point of access for the combined site from Forest Road (as an alternative to accessing BIN6 via Emmets Park).	There are sufficient sites to meet the Local Housing Need therefore new greenfield sites will not be considered at this stage.
BIN17 - Land north of Tile House and Honeysuckle Cottage, Tilehurst Lane Developer/Site promotor Woolf Bond Planning on behalf of JPP Land Ltd (ID593) consider the site would form a logical area of development between two approved schemes allowed on appeal (BIN1 and BIN2).	The site has been assessed and is considered to be less suitable for development than other sites that are proposed for allocation. Detailed information on why it is an omission site are set out in the Housing Background Paper.
The White Cottage, Forest Road Binfield Developer/Site promotor Thakeham Homes (ID653) considers the site is available, suitable and deliverable and perceptually linked to Binfield.	Outside the Borough Boundary

BFLP Revised Growth Strategy (2019)	
Main Issues Raised	Council's Response
BRA1 Land at Parkview Farm, Old Wokingham Road Developer/Site promotor Turley on behalf of Berkley Strategic Land Ltd (ID565) considers the site is available, suitable and deliverable.	The sites have been assessed and are considered to be less suitable for development than other sites that are proposed for allocation. Detailed information on why they are omission sites is set out in the Housing Background Paper.
BRA3 – The Hideout Developer/Site promotor Terence O'Rourke Ltd on behalf of Bracknell Land Ltd and Tingdene Parks Ltd (ID297) considers site suitable.	
The Peel Centre/Point (new site BRA18) Developer/Site promotor Landsec (ID728) considers site considers the site is available, suitable and deliverable.	The site has been assessed and is considered to be suitable for development and is proposed for allocation in the Pre-Submission BFLP (2021). Detailed information on why it is allocated are set out in the Housing Background Paper.
Land adjacent to Pinewood (new site) Developer/Site promotor Penfold (ID989) considers site considers the site is available.	There are sufficient sites to meet the LHN therefore new greenfield sites will not be considered at this stage.
SAND3 and SAND6 Land West of Wokingham Road, Sandhurst Developer/Site promotor Turley on behalf of Bloor Homes Ltd (ID601) considers the site is available, suitable and deliverable.	The sites have been assessed and are considered to be less suitable for development than other sites that are proposed for allocation. Detailed information on why they are omission sites is set out in the Housing Background Paper.
SAND8 - Eagle House Field, Crowthorne Road, Sandhurst Developer/Site promotor Bewley Homes considers the site is suitable for C2 residential care.	
Land adjacent to SAND9 (new site SAND10) Developer/Site promotor Progress Planning (ID801) considers site deliverable.	The site has been assessed and is considered to be suitable for development and is proposed for allocation in the Pre-Submission

BFLP Revised Growth Strategy (2019)	
Main Issues Raised	Council's Response
	BFLP (2021). Detailed information on why it is allocated are set out in the Housing Background Paper.
Land at Cabbage Hill (WAR4 and WAR5) Developer/site promotor Persimmon/Souter (ID893) consider the site is more suitable than others in the BFLP.	The sites have been assessed and are considered to be less suitable for development than other sites that are proposed for allocation. Detailed information on why they are omission sites is set out in the Housing Background Paper.
WAR8 - Land between Newell Hall and Cuckoo Cottage, Warfield Street Developer/site promotor Strategic Planning Research Unit on behalf of Hawkbury Homes Warfield Ltd (ID503) consider suitable, available and deliverable for a care home.	
WAR18 – Forest Farm, Forest Road, Hayley Green Developer/site promotor Nexus Planning on behalf of Kingacre Estates (ID566) considers the site is available, suitable and deliverable.	
WAR23 – Land adjacent to Home Farm, Forest Road, Warfield Developer/site promotor Solve Planning on behalf of Home Farm Land Ltd (ID481) considers site available and deliverable.	
Land adjacent to Jealott's Hill site (new site) Developer/site promotor Simmons and Sons (ID656) consider should be included in the allocation.	There are sufficient sites to meet the Local Housing Need therefore new greenfield sites will not be considered at this stage.
Land north side of Bowyer's Lane (Moss End) (new site) Developer/site promotor Michael Williams Planning on behalf of Schyde Investments considers site should be released from the Green Belt and included in Policy LP10.	

BFLP Revised Growth Strategy (2019)	
Main Issues Raised	Council's Response
<p>WINK12 (forms part of WINK14) Land to rear of 89 Locks Ride, Ascot Developer/site promotor Boyer on behalf of Nicholas King Homes (ID654) considers site suitable and was considered appropriate.</p>	<p>The sites have been assessed and are considered to be less suitable for development than other sites that are proposed for allocation. Detailed information on why they are omission sites is set out in the Housing Background Paper.</p>
<p>WINK22 - Land south of London Road, east of Bog Lane and west of Swinley Road (Whitmoor Forest), Bracknell Developer/site promotor Crown Estate (ID399) considers site suitable and it was previously proposed for allocation.</p>	
<p>WINK14 – Land at Winkfield Row Developer/site promotor Pegasus on behalf of Persimmon Homes Thames Valley & Jaynic Ltd (ID1016) considers site suitable and it was previously proposed for allocation.</p>	
<p>WINK35 - Land off Locks Ride, Winkfield Row (forms part of WINK14b) Developer/site promotor Gladman (ID704) considers site suitable including for self-build.</p>	
<p>WINK17 – Chavey Down Farm, Longhill Road Developer/site promotor Woolf Bond Planning on behalf of Warfield Park Homes (ID573 & 576) considers site is suitable.</p>	
<p>WINK18 - Whitegates, Longhill Road Developer/site promotor Woolf Bond Planning on behalf of JPP Land Ltd (ID692) should be included in the settlement area of Bracknell</p>	<p>The site has planning permission (ref 18/00336/FUL) for 13 dwellings allowed on appeal (October 2019). As it is now a hard commitment, it does not need to be considered further in terms of an allocation in the Plan.</p>
<p>WINK19 – Land between London Road & Longhill Road</p>	

BFLP Revised Growth Strategy (2019)	
Main Issues Raised	Council's Response
Developer/site promotor Napper (ID218, 224) considers site suitable.	The sites have been assessed and are considered to be less suitable for development than other sites that are proposed for allocation. Detailed information on why they are omission sites is set out in the Housing Background Paper.
WINK30 - Land at the Rough Developer/site promotor Boyer on behalf of W J Channing and Sons (Woking) Ltd Minstead Ltd and Markfield Ltd (ID991) considers site should be released from the Green Belt.	
Additional land related to WINK34 - Palm Hill Extension (SA3), London Road (new site) Developer/site promotor Shanly (ID901) wish to extend allocated site to reflect boundary of submitted planning application 19/00847/OUT for 81 dwellings.	The boundary of site WINK34 has been extended to include this area of land.
LP5 Sites allocated for residential/mixed use development (BRA4 Land at Beaufort Park, Nine Mile Ride (South Rd))	
Historic England (ID454) consider archaeological investigation may be required.	Supporting text amended to include a requirement for archaeological investigations.
Environment Agency (ID950) state that wastewater should be appropriately disposed of to ensure the underlying geology (including a Secondary A Aquifer) is not polluted and water quality is protected.	Supporting text amended to include reference to wastewater and protection.
Natural England (ID1004) raised concerns about proximity to the Thames Basin Heaths SPA. Careful consideration of where the SANG should go on site needed.	Location of SANG will be shown on the illustrative concept plan although work at the planning application stage will determine its exact location in consultation with Natural England. This will be linked to the SANG (woodland) at Great Hollands Recreation Ground and Bucklers Forest SANG at the TRL site. Concept Plan and supporting text amended accordingly.

BFLP Revised Growth Strategy (2019)	
Main Issues Raised	Council's Response
Wokingham Borough Council (ID372) wish remain engages with transport modelling and IDP work to ensure that there are no significant detrimental impacts of planned development on Wokingham Borough.	The Council has an ongoing history of co-operative working with all neighbouring authorities and welcomes the continuation of the approach.
Crowthorne Parish Council (ID207 & 271), Wokingham Without Parish Council (ID312 and 313) and residents raised concerns about loss of strategic gap.	Woodland along the B3430 (Nine Mile Ride) acts as a physical and visual gap between the built areas of Bracknell and Crowthorne. Therefore, a gap function would be retained. However, the policy amended to refer to including a strategic landscape buffer along Nine Mile Ride.
Bracknell Town Council (ID317) and residents raised concern about the access via South Road not being suitable and access via Nine Mile Ride should be via existing roundabout.	It is anticipated that the primary site access point will be via the TRL roundabout, with South Road acting as a secondary minor access with measures put in place to reduce the attractiveness of South Road as an access point. Policy and concept plan amended to show change of location into main site.
Parish Councils, residents and developers/site promoters objected to the proposed allocation on the following grounds including: traffic impacts, increase in pollution/congestion, cumulative impact with other developments, loss of trees/woodland, climate change implications, pressure on services, poorly related to Bracknell/isolated.	Information on why the site is considered appropriate for allocation is set out in the Housing Background Paper which summarises the more detailed topic based evidence studies. The infrastructure requirements associated with the development of the sites are detailed in the Infrastructure Delivery Plan (IDP).
A number of developers/site promoters considered alternative site more suitable.	Responses to omission sites are detailed under LP4.
Boyer on behalf of JPP Land Ltd and Hodge Developments (ID772) consider policy should therefore reflect the recent permission at Beaufort office site, through an amendment to the proposed revised settlement boundary.	The decision allowed on appeal relates to outline permission, with layout relating to a future reserved matter. Therefore, the extent of built form is not yet known, so an amended settlement boundary to reflect future development of the site cannot be determined at this

BFLP Revised Growth Strategy (2019)	
Main Issues Raised	Council's Response
	stage. This is consistent with the approach taken to settlement boundary changes with other similar approved (but not yet implemented) schemes.
LP6 Sites allocated for residential/mixed use development (SAND5 Derby Field)	
Historic England (ID454) consider archaeological investigation may be required.	Supporting text amended to include archaeological assessment.
Environment Agency (ID950) state that wastewater should be appropriately disposed of to ensure the underlying geology (including a Secondary A Aquifer) is not polluted and water quality is protected.	Supporting text amended to include reference to wastewater and protection of water quality.
Wokingham Borough Council (ID372) wish remain engages with transport modelling and Infrastructure Delivery Plan work to ensure that there are no significant detrimental impacts of planned development on Wokingham Borough.	The Council has an ongoing history of co-operative working with all neighbouring authorities and welcomes the continuation of the approach.
Crowthorne Parish Council (ID272) and a number of developer/site promoters object due to the loss of open space/playing pitches	Policy requirements include provision of alternative playing pitches, on-site open space of public value, and a requirement for a Masterplan. The landowner has found other land within their ownership where playing pitches and active open will be re-provided. The Policy seeks that the re-provision will establish public use.
Wokingham Without Parish Council (ID313) and residents object to the proposed allocation on the following grounds including: increased traffic/congestion, pollution/air quality.	A Transport Assessment of the site has identified highway improvements that will be required to support the development. An air quality assessment of the Local Plan is in progress.

BFLP Revised Growth Strategy (2019)	
Main Issues Raised	Council's Response
Wokingham Without Parish Council (ID313), residents and developers/site promoters object due the lack of on-site SANG.	It is not possible to provide an on-site SANG on a site of this size because the SANG would need to encompass a minimum 2.3km circular walk to meet Natural England's SANG Quality Guidance. A SANG solution is identified in the Habitats Regulations Assessment.
A number of developers/site promoters object due to the loss of a gap and consider there are better alternatives/sites.	Policy includes a requirement to maintain a gap between Crowthorne and the linear development to the south, including provision of landscape buffer. The landscape buffer, OSPV and boundary along Wokingham Road are located outside of the defined settlement. Responses to omission sites are detailed under LP4.
<p>The site promotor Wellington College (ID975) suggested detailed changes to the policy:</p> <ul style="list-style-type: none"> • To allow flexibility in dwelling numbers by adding 'approximately' • To allow flexibility in the requirement for serviced plots for custom builders, • To amend transport requirements to refer to 'appropriate' measures • To amend the requirement for Active on-site Open Space Public Value to enable part provision on site, and financial contribution towards off-site provision • Remove reference to design code and masterplan should be submitted as part of a planning application, not before. 	<ul style="list-style-type: none"> • Policy amended to include 'approximately' • Policy amended to include 'up to'. • Policy amended to refer to specific infrastructure requirements and other transport improvements • Policy amended to OSPV, and specifics required. Supporting text amended to refer to financial contributions towards off-site provision. s • A design code and masterplan will be required however Policy amended to delete requirement for them to be submitted prior to any planning application.
LP7 Sites allocated for residential/mixed use development (Land at Jealott's Hill Warfield)	

BFLP Revised Growth Strategy (2019)	
Main Issues Raised	Council's Response
Natural England (ID1005) consider SANG is narrow.	SANG will link to other SANGs nearby such as Frost Folly and Windmill Farm forming part of a superSANG. Concept plan amended and the Council will work with Natural England.
Royal Borough of Windsor and Maidenhead (ID879) objects to the proposals as will significantly impact RBWM (significantly impact highway and transport networks within RBWM, particularly along A330/A308 corridor), considers the site is isolated in Green Belt and makes a substantial contribution to the openness of the Green Belt. Exceptional circumstances have not been demonstrated and there is little evidence that alternatives to enabling development have been considered.	<p>Information on why the site is considered appropriate for allocation is set out in the Housing Background Paper which summarises the more detailed topic based evidence studies. The infrastructure requirements associated with the development of the site is detailed in the Infrastructure Delivery Plan (IDP). The Duty to Cooperate discussions are summarised in the Duty to Co-operate Statement.</p> <p>Further evidence on 'exceptional circumstances' is set out in the Jealott's Hill Background Paper and further evidence has been made available on the economic and financial case concerned with development at Jealott's Hill.</p>
Royal Borough of Windsor and Maidenhead (ID879) also raised concern regarding adverse impact on biodiversity (including off-site), increase in emissions worsening climate change, impact on landscape.	
Royal Borough of Windsor and Maidenhead (ID879) are not aware of any duty to co-operate discussions with other authorities, including Slough, to ascertain whether over-provision could meet other unmet needs.	
<p>A number of Parish Councils (including neighbouring parishes outside the Borough) and approximately 300 residents responded, and the majority opposed the proposed allocation on the following grounds:</p> <ul style="list-style-type: none"> Disagree with Green Belt release. Site contributes to the 5 purposes. Lack of evidence to justify exceptional circumstances for Green Belt release. 	<p>Information on why the site is considered appropriate for allocation is set out in the Housing Background Paper which summarises the more detailed topic based evidence studies. The infrastructure requirements associated with the development of the site are detailed in the Infrastructure Delivery Plan (IDP).</p> <p>Further evidence on 'exceptional circumstances' is set out in the Jealott's Hill Background Paper and further evidence has been</p>

BFLP Revised Growth Strategy (2019)	
Main Issues Raised	Council's Response
<ul style="list-style-type: none"> Concern over merging of settlements e.g. subsequent release of further Green Belt between Bracknell and Jealott's Hill/up to Maidenhead. Concerns regarding morality of Green Belt release for foreign investors to benefit. Concerned regarding loss of rural and open character especially considering topography of the site. Adverse impact on historic environment. Loss/change of footpaths and bridleways. Unsustainable location, car dependent and no public transport, adverse impact to the road network/increase congestion (include comments regarding out of borough impacts (Holyport in particular)), inability to improve sustainable transport links/roads. Concerns raised over the lack of detail on proposed improvements. Concerns regarding economics, including issues such as the lack economic details/evidence; Syngenta's ability to self-fund or use other funding sources; lack of benefit for the borough; money to go to China; no evidence of demand for Science Park from other companies; potential for Syngenta to leave anyway as no guarantee will stay; Comments that alternatives have not been considered sufficiently e.g. <ul style="list-style-type: none"> redevelop existing brownfield land on site; other funding sources; relocate business as it no longer needs agricultural land to sites within the Borough (including empty office space), Reading Science Park or Oxford-Cambridge corridor for example; Other non-Green Belt sites; The site not required as above housing need. 	<p>made available on the economic and financial case concerned with development at Jealott's Hill.</p>

BFLP Revised Growth Strategy (2019)	
Main Issues Raised	Council's Response
<ul style="list-style-type: none"> • No need for housing for employees. • Comments regarding employment – loss of jobs would not be significant/low unemployment so jobs not needed/no guarantee to stay/new specialist employees would commute from a long distance increasing traffic. • Concerned over adverse impact on biodiversity due to loss of habitats including farmland and impact on nearby designated sites. • Increase in pollution and adverse impact on air quality. • Concerns regarding pressure on infrastructure (including roads) and services and new infrastructure will only support new residents. • Adverse impact on climate change/sustainability matters and that the Council should be ahead of the curve. • Overdevelopment of the north of the borough/overdevelopment of the site. • Garden settlement terminology is inconsistent/inappropriate. • Conflict with Warfield Neighbourhood Plan. • Conflict with other draft policies in the Local Plan including the spatial strategy. 	
A number of residents accepted of the need to develop/redevelop the business facilities at the site, but not housing.	
Several Syngenta employees consider that there is more than enough brownfield land on the site to develop the Science and Innovation Park.	
Developers/site promoters object on grounds which include the following:	

BFLP Revised Growth Strategy (2019)	
Main Issues Raised	Council's Response
<ul style="list-style-type: none"> • Conflicts with NPPF. • No justification for removing site from the Green Belt as it contributes to the Green Belt purposes and no exceptional circumstances. • Other reasonable options/sites are available • Not required as housing needs met. • Employment needs can be met without need to release Green Belt. • No evidence that housing is needed to deliver improvements. • No evidence site in current form is unviable. • Lack of existing infrastructure/ significant improvements needed and no evidence can be delivered in time. • Not a sustainable location. • Contrary to other draft policies in the Local Plan including the spatial strategy. 	
Chapter 6.6 Forms of residential accommodation	
A number of developers/site promoters considers policy should support all forms of housing including those with the potential to grow in future and C2 accommodation	Emerging market segments are covered in the Bracknell Forest Housing Needs Assessment (2020) (LP/v/2g) and carried forward into the BFLP as appropriate. The approach to specialised housing for older people is to allocate some of the need to specific strategic sites and provide a development management policy to cover windfall development.
LP8 Affordable Housing (LP9 in Pre-Submission BFLP)	
A number of residents raised concerns that affordable housing requirements should not be diluted by viability and should be genuinely affordable.	The policy requirement to deliver 35% affordable housing would be subject to plan wide viability testing in accordance with the NPPF

BFLP Revised Growth Strategy (2019)	
Main Issues Raised	Council's Response
	(para 57). The onus would be on the applicant to demonstrate that there is a case for a viability assessment at the application stage.
The HBF (ID749) state there is a need to increase the overall housing requirement in order to meet the need for affordable homes.	<p>The Bracknell Forest Housing Needs Assessment March 2020 shows a higher level of affordable housing need than in the 2016 SHMA i.e. a total need of 376 affordable homes per year is calculated split between 232 units of rented affordable homes and 124 affordable home ownership products.</p> <p>The required level of affordable housing target is set at a level that seeks to achieve an appropriate balance between meeting much of the need within the Borough, whilst ensuring the delivery of other important elements such as infrastructure and the maintenance of a sustainable housing market which will deliver the range of housing needed to help meet market demand as well affordable. Increasing the overall housing requirement and therefore market housing, will not necessarily deliver more affordable housing. There is a limit to market absorption.</p>
The HBF (ID749) and a number of developers/site promoters consider the viability evidence published needs updating, is not robust and approach flawed as ignores potential increases in build costs.	The viability evidence is being updated alongside the Pre-Submission BFLP (2021).
A number of developers/site promoters objects to the increase in the level of affordable housing from the current 25% to 35% as no robust evidence can be viably achieved (viability assessment indicates in lowest land value areas affordable housing becomes marginal/unviable).	The required level of affordable housing target is set at a level (based on viability assessment) that seeks to achieve an appropriate balance between meeting much of the need within the Borough, whilst ensuring the delivery of other important elements such as infrastructure and the maintenance of a sustainable housing market.

BFLP Revised Growth Strategy (2019)	
Main Issues Raised	Council's Response
A number of developers/site promoters consider policy overly prescriptive, should be more flexible and reviewed on a case by case basis and there is no wording to deal with a situation where the delivery of affordable housing would render the scheme unviable. Policy should be amended to read 'affordable housing to be provided subject to viability considerations.	The policy requirement to deliver 35% affordable housing has been subject to plan wide viability testing in accordance with the NPPF (para 57). The policy and supporting text has been redrafted to make it clearer what a developer is expected to provide in the event of abnormal site costs and changes in circumstances. The onus is on the applicant to demonstrate that there is a case for a viability assessment at the application stage.
Chapter 6.8 Housing for older people and people with disabilities	
A number of developer/site promoters and a resident consider that sites should be allocated for older people, including C3 care homes.	The Bracknell Forest Housing Needs Assessment (2020) (LP/v/2g) sets out the need for accommodation for older people although this must be seen in the light of the Council's strategy to this and local factors. Most prefer to stay in their own homes with support. The approach is to allocate some of the need to specific strategic sites and a development management policy will address windfall development.
A number of developer/site promoters questions how current the data is underpinning the needs assessment. Raised concerns that of the needs for C3 units for older people, is not being met and there is shortfall. Developer/site promotor own assessment of the specialist accommodation needs for older people indicates a shortfall is considerably more than identified in the Plan.	
Chapter 6.9 Self build, Custom Build and Gypsy, Travellers and Travelling Showpeople	
Wokingham Borough Council (ID368) expect the Council to meet its Gypsy and Traveller needs in full and to explore options for meeting identified and wider cultural need.	The Council is planning to meet its wider cultural need for the plan period.
Developer/site promotor Gladman considers should be a proactive policy-led approach to enabling self-build and custom-build.	There is a requirement for custom and self build plots on 3 of the strategic sites.
LP9 Provision of economic floorspace (LP11 in Pre-Submission BFLP)	

BFLP Revised Growth Strategy (2019)	
Main Issues Raised	Council's Response
West Berkshire Council (ID595) questions whether the market will be able to deliver the 20ha of industrial/warehousing space required over the plan period	The strategy is to take a flexible approach to the provision of 'employment' floorspace by allocating for a broader category i.e. 'economic floorspace'. The supply and take up of 'employment' floorspace within this broader category will need to be monitored carefully and reviewed in a future local plan.
Developer/site promotor BRP (ID626) policy refers to an approximate quantum of floorspace - potential for a significantly large quantum of new retail floorspace to be delivered outside of the primary shopping area which could undermine the town centre strategy.	The flexibility support changes in the economy and changes in shopping and leisure patterns. Recent national legislation concerning permitted development right and changes of use means that the Council has limited control through the planning process.
Developer/site promotor BRP (ID626) considers the Retail Study needs updating.	The Council commissioned further evidence in The Town Centre Retail Needs: Technical Review (2020) (LP/Ev/3e).
Developer/site promotor Landsec (ID729) considers Peel Centre/The Point could deliver a number of key requirements and should be referred to.	The Peel Centre/The Point is allocated for mix use development in the Pre-Submission BFLP (2021).
Developer/site promotor Syngenta (ID676) considers the Employment Land Needs Study summary does not take account of opportunities to boost employment growth. Bracknell has weak job growth and economy compared to other authorities in the Local Enterprise Partnership. Jealott's Hill provides opportunity to address underperformance and ensure Syngenta's retention and growth.	Land at Jealott's Hill has been allocated in the Pre-Submission BFLP (2021) for a mixed use development which includes employment floorspace that is now acknowledged as contributing to meeting needs.
LP10 Hierarchy of 'Town Centres' (LP12 in Pre-Submission BFLP)	

BFLP Revised Growth Strategy (2019)	
Main Issues Raised	Council's Response
Developer/site promotor Schyde (ID354) and a number of residents consider Moss End should be a local centre.	Due of the nature of services available in a location with poor access for sustainable transport, designation of Moss End as a 'town centre' would not be consistent with the NPPF.
Developer/site promotor Landsec (ID729) considers Peel Centre/The Point and the wider area could be identified within the hierarchy as an edge of centre location. Site could accommodate residential, office, flexible retail and leisure in line with market demand.	The hierarchy defines the Borough's town centres, in accordance with para 85 (d) of the NPPF. Former draft Policy LP11 has been deleted in and The Peel Centre/The Point is allocated for mix used development in the Pre-Submission BFLP (2021).
Chapter 7: LP11 Edge of Centre retail location (policy deleted in Pre-Submission BFLP)	
Developer/site promotor BRP (ID626) considers there are other edge-of-centre sites closer to the Primary Shopping Area than the Peel Centre.	The Peel Centre/The Point is allocated for mix used development in the Pre-Submission BFLP (2021).
Developer/site promotor Landsec (ID729) and residents considers The Peel Centre/The Point should be redeveloped for a range of uses.	
LP12 Local infrastructure and facilities (LP13 in Pre-Submission BFLP)	
Affinity Water (ID173) demand due to additional sites requires reinforcements to infrastructure.	The IDP will be updated accordingly.
Wokingham Borough Council (ID366) considers the Council need to engage with WBC in the production of infrastructure related document such as the IDP.	The Council has been working with Wokingham and other neighbouring boroughs. Further transport modelling has been undertaken and discussions with Wokingham and other neighbouring boroughs.

BFLP Revised Growth Strategy (2019)	
Main Issues Raised	Council's Response
Environment Agency (ID952) considers there is no clear policy on Blue Infrastructure and wastewater infrastructure. Important to reflect findings of the Water Cycle Study. Where capacity constraints have been identified and not programmed in Thames Water's Asset Management Plan in the desired timeframes, the developer should set out how improvements will be completed in advance of occupation.	Policy LP15 Green Infrastructure includes blue infrastructure. The IDP addresses wastewater infrastructure requirements.
A resident considers the list of infrastructure in para 8.2 does not reflect the chapter	Supporting text amended to include all elements of infrastructure and to explain all the different mechanisms to secure infrastructure
A number of residents consider that public transport needs to be improved and roads are congested.	The BFLP aims to promote and facilitate alternative modes of transport throughout all the policies. The Council can only influence public transport routes not operators.
A resident suggested wording changes to the policy to strengthen it by deleted reference to "seek too" and "where appropriate".	Policy amended to strengthen wording.
Developers/site promoters object to wording in point 2 as unlikely development will be able to address all principles identified.	The policy is caveated by the term "where appropriate to the scale and nature of development", however, policy has been simplified.
Two developers/site promoters consider the supporting text should reflect the CIL regulations and should explain the use of CIL and s106.	Supporting text amended to clarify the use of CIL and s106.
Developer/site promotor Bracknell Ltd (ID758) considers policy point 3 concerned with viability is not flexible enough and requirements should be reviewed on a site by site basis.	Policy amended to reflect guidance on viability.

BFLP Revised Growth Strategy (2019)	
Main Issues Raised	Council's Response
LP14 Standards for OSPV (LP34 in Pre-Submission BFLP)	
The Woodland Trust (ID785) considers should use Natural England's (NE) Accessible Natural Green Space Standard and Woodland Trust has developed a Woodland Access Standard.	The NE standards are already largely complied with at the higher end of the scale. However, the Council has developed its own Local Access to Nature Standard. The Woodland Trust standards are included.
A resident raised concerns that the 'plus one' contribution is in lieu of new provision	This does not replace in-lieu provision but is essential for new developments which rely on existing open spaces.
A resident considered the provision of OSPV and/or SANG should be available within walking distance of every dwelling	Agrees with the principle of OSPV being close to all residents and the Local Access to Nature standard seeks to address some of these issues. However, in the case of SANGs this is not possible due to the size of SANGs. Development of 9 or less dwellings do not need to be within the catchment of a SANG.
Developer/site promotor Syngenta (ID683) considers Table 2 is unclear on what is sought for Jealott's Hill. Table 2 needs to be revised to make it cleared that where a SANG is provided and meets the requirements of OSPV then there should not be a requirement for additional OSPV or a contribution 'in lieu'.	Subject to Habitats Regulations Assessment the site may need a SANG at a lesser standard than if the site was within 5km of the SPA. Jealott's Hill policy and supporting text amended to clarify expectation and requirements regarding GI and all associated provision.
A few developer/site promoters consider the standard for woodland should be an aspiration.	Considered appropriate to have a standard however it is recognised that town centre sites may not be able to achieve the target. Amend standard to include reference to accessing a connected network of tiny forests.
Developer/site promoter Bracknell Ltd (ID760 policy not sufficiently flexible and OSPV should be reviewed on a case by case basis.	The policy is a starting point in the determination of planning applications and should material considerations result in the need for flexibility, then this would be applicable.

BFLP Revised Growth Strategy (2019)	
Main Issues Raised	Council's Response
Chapter 9.1: Climate Change	
Environment Agency (ID953) should include blue infrastructure and paragraph 9.6 should be amended for clarity on expected impacts of climate change. A resident also considered blue infrastructure should be referenced.	Supporting text amended to refer to blue infrastructure and expected increases in flood risk.
Winkfield Parish Council (ID984) considers reference should be made to Council's target zero net carbon contribution by 2050.	Supporting text amended to include reference to the target.
A resident and BBOWT (ID339) considered paragraph should refer to net zero carbon, not zero carbon.	Supporting text amended to refer to net zero carbon
LP15 Green Infrastructure (LP16 in Pre-Submission BFLP)	
Environment Agency (ID954) suggest '8m wide undeveloped area' adjacent to main rivers is increased to a 10m buffer ecological buffer zone should be created or retained between the top of the river bank and the development (20m wide undeveloped area in total).	No research, national guidance or policy is referred to that specifically justifies the requested 10m requirement (as opposed to 8m). However, policy amended to clarify that the buffer should extend between the top of the river bank and the development. Supporting text amended to refer to the ecological importance of the buffer zone.
Environment Agency (ID954) consider reference to de-culverting rivers should be included in policy criterion ii	We will only approve proposals that include culverting of a watercourse if there is no reasonably practicable alternative. This is clarified in the supporting text.
Environment Agency (ID954) consider there should be standalone river corridor policy.	The requested policy does not appear to add anything to the proposed policy framework and as such would appear to be repetitious.

BFLP Revised Growth Strategy (2019)	
Main Issues Raised	Council's Response
A number of residents and Warfield Parish Council consider that GI should include the Green Belt and farmland, which distorts the picture of current GI provision in the northern parishes.	GI relates to a particular set of assets it is not appropriate to apply it as a blanket across the green belt and farmland as would weaken GI as a designation.
Developer/site promoters consider viability and site specific circumstances should be taken into account and policy should be amended to include 'where possible'.	Viability is not relevant and the NPPF states that planning policies and decisions should contribute to and enhance the natural and local environment.
LP16 Thames Basin Heaths SPA (LP17 in Pre-Submission BFLP)	
Royal Borough of Windsor and Maidenhead (ID883) and a develop/site promotor Lightwood Strategic (ID666) considers it is unclear whether there will be enough SANG capacity for the proposed housing allocations.	The Habitats Regulations Assessment demonstrates that there is sufficient SANG capacity for all the allocations in the BFLP and that SANG capacity has been safeguarded for this purpose.
Royal Borough of Windsor and Maidenhead (ID883), Crowthorne Village Action Group (ID186) and Campaign to Protect Rural England (ID191) consider the housing site allocations will result in reduction in air quality on the SPA. Further mitigation work needs to be carried out in this area.	An air quality assessment is in progress. The Council is aware that air quality mitigation measures may be required which may then need to be incorporated into policy and supporting guidance.
Developer/site promotor Syngenta (ID686) states para 9.26 is incorrect as it does not refer to the fact that the Habitats Regulations / Directive can permit development that causes harm if it passes the 'Imperative Reasons of Overriding Public Interest' (IROPI) test.	Supporting text amended to include the IROPI test.
Developer/site promotor Landsec (ID732) consider large urban sites unable to provide on site SANG.	Supporting text amended to clarify that large developments can provide an off-site SANG or purchase SANG capacity from third party.

BFLP Revised Growth Strategy (2019)	
Main Issues Raised	Council's Response
Developer/site promotor Gladman (ID715) query how protecting environmental assets is considered in the viability assessment.	This is agreed in principle but the full consideration of environmental considerations will be assessed at the application stage. The cost of SANG and SAMM mitigation is a consideration of general viability but this does not include a situation where private SANG capacity is required.
Developer/site promotor Escrillion (ID722) considers clear thresholds needed for defining large and small sites.	Defined in the Thames Basin Heaths Special Protection Area Supplementary Planning Document (2018) which will be updated periodically as necessary.
Developer/site promotor Escrillion (ID722) concerned policy does not refer to third party SANG. It is unclear how individual developments that sit within larger allocations will be expected to secure and deliver SANG provision – need to clarify that bespoke or private third party SANG can be used.	Supporting text amended to clarify that other forms of SANG capacity, including third party can be utilised.
Site promoters/developers Jordon Construction (ID968) and Wellington College (ID979) queries why small developments outside of settlement area which are otherwise acceptable in policy terms, would not qualify for Council-owned strategic SANG capacity.	In order to be able to demonstrate that Local Plans are sound, the Councils SANG capacity must be safeguarded for planned development on allocated sites.
LP17 Flooding and Drainage (LP18 in Pre-Submission BFLP)	
Environment Agency (ID955) considers the policy is not specific to Bracknell Forest and a number of detailed wording changes with regards to only allowing water compatible uses and essential infrastructure in the functional flood plain, compensating loss of flood plain storage and taking climate change into account.	Policy amended accordingly.

BFLP Revised Growth Strategy (2019)	
Main Issues Raised	Council's Response
Environment Agency (ID955) supporting text paragraph 9.38 consider use of regard is insufficient and paragraph 9.45 could be strengthened by including reference to most vulnerable development being located in the areas at lowest risk of flooding.	Supporting text amended to strength wording and include reference to the sequential approach with the most vulnerable development being located in the areas at lowest risk of flooding.
Environment Agency (ID960) considers policy should be a Development Management policy.	Policy is considered strategic and is not related to specific sites.
A number of developers/site promoters raised concerns that policy does make an exception for sites within flood zone 1, which would not ordinarily require sequential test to be undertaken.	Amend policy to clarify the sequential is applied when required by national policy, and for changes to a more vulnerable use.
LP18 Separation of settlements (gaps) (LP19 in Pre-Submission BFLP)	
A number of residents raised concerns that the strategic gap study stops south of Forest Road.	The purpose of a gap is to prevent merging of settlements. The Study considered whether gaps were appropriate between existing defined settlement areas. As there is no settlement north of Forest Road, there is no need for a gap designation in this location.
A number of residents consider that a green wedge is required between the Jealott's Hill proposed allocation and the defined settlement boundary for the allocation at Warfield.	The area around the proposed Jealott's Hill allocation, including to the south would remain as Green Belt. One of the purposes of the Green Belt is to prevent neighbouring towns from merging into one another. Therefore, it is not considered that a further gap designation in relation to preventing coalescence of settlements would not be required.
Two developers/site promoters consider the gaps are different to those identified in the Landscape Recommendations Report (CLP/Ev5b) and is not supported by the South East Plan as policy omitted.	Two different maps are contained in the Landscape Recommendations report relating to extent of gaps and the gaps on the key diagram, and the Draft Local Plan Policies Map reflects a combination of the two maps, having regard to the extent of proposed allocated sites and their associated developable area.

BFLP Revised Growth Strategy (2019)	
Main Issues Raised	Council's Response
A number of developers/site promoters object to the policy as strategic gaps are not supported by national policy, not justified as the NPPF no longer protect the intrinsic character of the countryside and there is no evidence for designation.	The proposed gaps were defined having regard to the most up to date evidence in the Landscape Character Assessment (CLP/Ev/5a) and Landscape Recommendations Report (CLP/Ev5b). Therefore, it is considered that there is justification for 'gaps' within the Borough, including ones previously dismissed at the Core Strategy examination (which relates to different evidence base and plan period). The NPPF whilst not specifically referring to 'gaps', does refer to conservation and enhancement of the natural and built environment.
Crowthorne-Sandhurst Gap	
Wellington college (ID981) inappropriate for Wellington College Estate to fall within the Strategic Gap between Crowthorne and Sandhurst. It is neither an 'open area of land' or 'predominantly undeveloped'. Request designation removed.	Large parts of the wider Wellington College Estate are undeveloped. It is accepted that 'gaps' do not necessarily prevent development. Proposals will need to demonstrate that the landscape functions relating to the separation of settlements have not been compromised.
Bracknell-Crowthorne Gap	
Crowthorne Village Action Group (ID185) and Campaign to Protect Rural England (ID191) concerned regarding definition of what constitutes a strategic gap - no mention of physical impact, preventing coalescence or cumulative impact. Beaufort Park (Policy LP5) contrary to the policy.	Supporting text amended to also refer to physical and visual separation.
Bracknell-North Ascot Gap	
A resident queried the purpose of the gap and questions whether the same as Entec Study (Core Strategy evidence study), as has	The proposed gaps were defined having regard to the most up to date evidence in the Landscape Character Assessment (CLP/Ev/5a) and Landscape Recommendations Report

BFLP Revised Growth Strategy (2019)	
Main Issues Raised	Council's Response
<p>been development and adopted policies have not prevented coalescence.</p> <p>The land should be designated as Green Belt as compensation for Jealott's Hill.</p>	<p>(CLP/Ev5b). The purpose of gaps is to prevent coalescence of settlements, they do not necessarily prevent development. However, any development within such designations will need to demonstrate that the landscape function relating to separation of settlements has not been compromised.</p> <p>In relation to the allocation of land at Jealott's Hill, Green Belt compensatory measures include greater public access and linkages to wider Green Belt (see Jealott's Hill Background Paper). Measures will be refined through master planning and design stages.</p>
<p>A number of developers/site promoters consider there no evidence or need for designation, and gap between Bracknell and Ascot was previously rejected at the Core Strategy examination.</p> <p>Objections were raised to including land at</p> <ul style="list-style-type: none"> • Bracknell East as site visually well contained, • land at the rough as site has tree cover and is surrounded by development, • land rea of Locks Ride as it is too small, enclosed and includes gardens. • Land at WINK14 as provides no meaningful contribution to the coalescence of settlements 	<p>The proposed gaps were defined having regard to the most up to date evidence in the Landscape Character Assessment (CLP/Ev/5a) and Landscape Recommendations Report (CLP/Ev5b). Therefore, it is considered that there is justification for 'gaps' within the Borough, including ones previously dismissed at the Core Strategy examination. The NPPF does not specifically refer to 'gaps', it does refer to conservation and enhancement of the natural and built environment.</p> <p>The gap areas listed relate to function of the land to prevent coalescence of settlement and relate to both physical and visual separation.</p>
Bracknell-North Ascot Gap	
<p>Developer/site promotor Lightwood Strategic (ID667) considers the gap should follow the road rather than administrative boundary. Land between the roads and the administrative boundary could be developed.</p>	<p>The Council can only include designations within the administrative boundary and cannot make changes beyond the Borough boundary.</p>

BFLP Revised Growth Strategy (2019)	
Main Issues Raised	Council's Response
LP19 Built Environment (LP15 in Pre-Submission BFLP)	
Binfield Parish Council (ID523) consider the design principles should contribute to community cohesion, with community infrastructure integral to developments.	The policy references that development should contribute to inclusive, connected and healthy communities. Creating focal points for communities would be considered as part of any masterplanning process.
South East Water (ID107) and a number of residents considered the policy should address water efficiency and energy efficiency, including net zero carbon.	Matters covered by Policy LP46.
Historic England (ID456) consider reference to understanding the historic environment should be included.	A full site appraisal is a requirement of the policy to inform proposals. Reference is also made to the retention of features that have heritage value.
Woodland Trust (ID782) no policy on the replacement of trees that may be removed, nor any requirement to provide additional trees as part of new developments. Should include target tree cover of 20% and replacement of trees lost through development.	Policy LP45 specifically requires new tree planting in development proposals where possible, the retention of trees and hedgerows of value and for development to maximise opportunities for tree planting, including the replacement of important.
A number of developer/site promotor considers it unclear why a masterplan and design code are required as a pre - requisite of a planning application. Policy should be amended to prepare alongside a planning application. Also considers requirement too prescriptive and flexibility needed – requirement should be considered on a case by case basis. Unclear what the threshold is above which Masterplan/ Design Code sought and what stage should be submitted.	The NPPF states that documents such as masterplans and design codes are used at an early stage. In order to provide a framework acceptable to all parties suggests that work should commence on a masterplan and design code prior to the submission of any planning application and should form part of pre application discussions. There has to be an element of flexibility with regards to the appropriateness of the site and need therefore a threshold is not considered appropriate.

BFLP Revised Growth Strategy (2019)	
Main Issues Raised	Council's Response
A number of developers/site promoters consider policy duplicates LP39.	LP19 is considered to set out key principles relating to site assessment, efficient use of land, mix of uses, access, meeting the needs of the community. LP39 discusses the details of a proposal, such as scale, streetscenes, landscaping etc.
Developer/site promotor S2 Bracknell Ltd (ID761) considers brownfield sites in sustainable locations are suitable for higher density development and policy should provide greater emphasis on providing housing.	Brownfield does not necessarily mean that high density development is appropriate for that location. Context is considered more important to drive proposals, whilst ensuring sites are being developed as efficiently as possible.
LP20 Policies Map Change (Policy deleted in Pre-Submission BFLP)	
Warfield Parish Council (ID551) and two residents expect to see Jealott's Hill designated as a defined employment area.	At this stage, the extent of the employment area is not known and it will be more appropriate to look at this issue through a future review of the Local Plan.
Residents consider if Jealott's Hill is developed a green wedge between new village and defined boundary of SA9 area (SALP allocation).	The land will be protected by the application of countryside and Green Belt policies.
Residents queried why hamlets in Warfield (Tickleback Row/Moss End) are not Green Belt villages.	They do not meet the definition of village set out in the Green Belt Village Assessment (LP/ev5d). Supporting text amended to clarify the nature and approach to Green Belt villages.
A number of developers/promoters of sites consider the settlement boundary should include all sites with planning permission (outline or detail).	Amendments to settlement boundaries are carried out in connection with the allocation of sites and in recognition of the construction of development granted planning permission since the previous review.

BFLP Revised Growth Strategy (2019)	
Main Issues Raised	Council's Response
A resident and a number of developer/sites promotor consider no justification for amending settlement boundary to include land North of London Road.	Due to the extensive nature of remedial works required, there is currently no certainty that the site is available and developable. Consequently, it would not be appropriate to allocate the site for development. However, in the longer term, it is possible that an appropriate scheme of remedial works can be agreed. The settlement has been adjusted in order to facilitate enabling works to help clean up the site.
Developer/site promotor Woolf Bond Planning on behalf of Warfield Park Homes (ID53) considers Warfield Park homes site should be included in the settlement boundary.	The exclusion of areas recommended to be included in gaps by in the Bracknell Forest Landscape Recommendations Report (CLP/Ev/5b) (such as the Warfield Park Homes Estate in) would not be justified.
Developer/site promotor BRP (ID627) objects to reduction in the primary shopping area of Bracknell town centre, particularly the southern part of Princess Square Shopping Centre and the Peel Centre edge of centre designation should be deleted.	The Peel Centre is allocated for mixed-use development in the Pre-Submission BFLP (2021) and the edge of centre designation has been removed. The primary shopping area is defined in the NPPF as the area where retail development is concentrated. The Bracknell Town Centre regeneration has refocused primary retail further north of Princess Square, which has led to an increase in the number of vacant units there.
Developer/site promotor Jordan Construction (ID966) requests removal and de-allocation of M&G's Homebase site from the designated Western Employment Area as in retail use and on periphery.	The Bracknell Forest Borough Council Employment Land Needs Study (LP/Ev/3e) indicates a need to retain employment land, therefore de-allocation of land within employment areas is only proposed where changes to use classes have damaged their integrity or the character of the area has changed. The retail use at the Homebase site does not damage the integrity of the employment areas, thus it would be inappropriate to remove from the employment area.

BFLP Revised Growth Strategy (2019)	
Main Issues Raised	Council's Response
LP21 Protection of Housing Stock (LP21 in Pre-Submission BFLP)	
No main issues.	
LP22 Housing for older people and people with disabilities (LP23 in Pre-Submission BFLP)	
Developer/site promotor RPS on behalf of Bewley Homes considers policy is unsound as it does not allocate sites for older persons' accommodation, failed to consider the updated PPG and as settlement boundaries are tightly drawn, very limited scope for delivery beyond brownfield opportunity sites.	Specialist accommodation for older people will form part of amended policy LP24 Housing Mix which will be which should be read in conjunction with policy LP8 Affordable Housing which requires C2/C3 retirement homes and sheltered housing to deliver affordable housing on qualifying sites and LP22 Accessible and Adaptable Housing (Pre-submission BFLP numbering).
Developer/site promotor Hawksbury Homes (ID507) policy should be amended to include being located in or near an existing settlement.	
A number of developer/site promotors consider policy must be consistent with the PPG, e.g. policy should be modified to make it clear that the introduction of any optional M4(3) requirement for wheelchair accessible homes standards is not applied to market housing. Insufficient information has been provided to justify policy and it should be subject to viability and local needs, including those for strategic sites.	<p>The Bracknell Forest Housing Needs Assessment (2020) (LP/v/2g) recommends support the delivery of accessible/adaptable homes.</p> <p>The BFLP and the delivery of the sites within it have been assessed on the basis of whole plan viability. The onus would be on the applicant to demonstrate that there is a case for a viability assessment at the application stage.</p>
LP23 Housing Mix (Policy LP24 in Pre-Submission BFLP)	
A developer/site promotor considers the physical factors under criterion 2 (iii) should be applicable to all proposal types in determining a variation from the Housing Mix (Table 1) – not just conversions.	Policy amended to set out the factors to be taken into account when varying from the specified housing mix.

BFLP Revised Growth Strategy (2019)	
Main Issues Raised	Council's Response
A number of developers/site promoters consider the policy needs flexibility to ensure that site specific circumstances can be considered, including character, on a case-by-case basis.	
A number of developers/site promoters considers the mix for private housing is demand related and should be left to the market to determine and rigid application of housing mix may not be appropriate in all case	<p>The range of housing sizes, types and tenures are linked to delivery of balanced and mixed communities rather than leaving it to the market to decide.</p> <p>The evidence for housing need within the Borough is set out in the Bracknell Forest Housing Needs Assessment (2020) (LP/v/2g). Policy amended to set out the factors to be taken into account when varying from the specified housing mix.</p>
LP24 Gypsies, Travellers and Travelling Show People (Policy LP25 in Pre-Submission BFLP)	
Historic England (ID459) consider policy should include reference to heritage assets.	The BFLP should be read as a whole; there is a policy related to heritage assets which is cross-referred to in the supporting text.
Environment Agency (ID957) consider policy should include reference to flood risk. In addition, water quality should be highlighted as a key consideration	<p>The BFLP should be read as a whole; there is a policy related to flood risk which is cross-referred to in the supporting text.</p> <p>Supporting text amended to include consideration of water quality and a cross reference to the pollution and hazards policy.</p>
LP25 Designated Employment Areas (Policy LP26 in Pre-Submission BFLP)	
Warfield Parish Council (ID57) considers Syngenta should be a designated employment area.	Policy LP7 'Land at Jealott's Hill, Warfield' requires the whole Jealott's Hill site to be covered by a masterplan. In order not to prejudice this process, it has not been possible to define the exact extent of the Employment Area (and therefore draw a boundary on the Policies Map) at Jealott's Hill.

BFLP Revised Growth Strategy (2019)	
Main Issues Raised	Council's Response
Developer/site promoters Savills on behalf of M&G Real Estate (ID797) object to homebase site being included in the Western Employment Area as been in A1 use for 20 years. Designation is a barrier to investment and does not allow flexibility in accordance with the NPPF. Offices which have been converted to residential use next to the site are proposed for removal.	Criterion ii) 'supports development that will enable existing businesses to expand and/or adapt to changing circumstances' so is considered to provide sufficient flexibility. The existing use contributes to building a strong, competitive economy set out in the NPPF chapter 6. Buildings to the west of the site are proposed for deallocation, because they have been converted into C3 residential use and in accordance with paragraph 120 of the NPPF, there is no reasonable prospect of the buildings returning to employment use.
LP26 Employment development outside designated Employment Areas (Policy LP27 in Pre-Submission BFLP)	
No main issues.	
LP27 Smaller Businesses (Policy LP28 in Pre-Submission BFLP)	
Warfield Parish Council (ID557) considers smaller units should be protected from change of uses.	The purpose of the policy is to acknowledge that smaller businesses fulfil an important role. The Local Plan should be read as a whole; it will be for the decision maker to determine the relative merits of proposals involving alternative uses as set out in 3.ii).
Developer/site promotor S2 Bracknell Ltd (ID793) considers that outside of allocated employment areas, applications involving loss of floorspace should be determined in accordance with the NPPF.	
LP28 Development in Bracknell Town Centre (Policy LP29 in Pre-Submission BFLP)	
Developer/site promotor considers the update the Retail Study needs updating and objects to reduction in extent of Primary Shopping Area.	<p>The Town Centre Retail Needs Technical Review (2020) (LP/Ev/3f) reviews the Retail Study.</p> <p>The objection to the reduction in the extent of the primary shopping area has been responded to under LP20.</p>

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Main Issues Raised	Council's Response
LP29 Development proposals in centres (Policy LP30 in Pre-Submission BFLP)	
Developer/site promotor BRP (ID643) queries whether updated shopping frontages are to be defined as there is a need for flexibility.	The NPPF (February 2019) no longer includes reference to primary and secondary frontages, only to the primary shopping areas. Therefore, there is no intention to identify frontages.
LP30 Edge of centre and out of centre development (Policy LP31 in Pre-Submission BFLP)	
Developer/site promotor BRP (ID644) concerned reference to 'defined centres' differs between retail, leisure and offices. Wording needs to make it clear that 'defined centre' for the purposes of Class A1 retail means the primary shopping area.	The extent of the defined centres, as set out in the strategic policy, are shown on the Policies Map. The need for the sequential test varies for offices as it is recognised that such a use can be critical to the health of recognised employment areas and the co-location of certain operations.
Developer/site promotor Savills on behalf of M&G Real Estate (ID797) considers there is no justification for the 1,000sqm threshold, which is 60% below national threshold (2,500sqm) which should be used.	The threshold reflects the size of the smaller centres as many have an overall floorspace of less than, or a little more than 1000sqm.
LP31 Protection of community facilities and services (Policy LP32 in Pre-Submission BFLP)	
Ministry of Defence (ID353) considers it inappropriate that the policy applies to the Royal Military Academy Sandhurst as public use of facilities is strictly controlled. MOD facilities should be exempt from having to meet the criteria to demonstrate facilities are surplus to requirements.	The applicant would need to put forward a material consideration to robustly demonstrate that it would be inappropriate to meet all policy requirements.
LP32 Play open space and sports provision (Policy LP33 in Pre-Submission BFLP)	
A resident raised concerns that artificial light is not appropriate in rural areas and the Green Belt.	Supporting text amended to refer to consideration of light pollution.

BFLP Revised Growth Strategy (2019)	
Main Issues Raised	Council's Response
LP33 Protection of countryside (Policy LP35 in Pre-Submission BFLP)	
Environment Agency (ID958) considers policy should refer to green and blue infrastructure and supporting text regarding the change of use of existing buildings should be of an appropriate vulnerability in relation to flood risk.	The Development Plan should be read as a whole, and these matters are addressed by other policies in the BFLP.
Developer/site promotor Leigh (ID145) considers policy unclear and repeats LP35 and sets out a list of developments that would be permitted which is not appropriate.	Policy amended to refer to being in accordance with national policy, plus (where relevant) additional criteria.
Ministry of Defence (ID353) supporting text should refer to Policy SA10 of the Site Allocations Local Plan (2013) and development for National Defence purposes.	Policy SA10 will remain part of the Development Plan, therefore, it is not considered necessary to include a cross reference it as the Development Plan should be read as whole.
Developer/site promotor Bewley (ID672) considers the policy does not take landscape character or amenity value in account.	Impact upon character and landscape quality is set out in a separate policy within the Plan.
Developer/site promotor Hawksbury Homes (ID507) and Spitfire Bespoke Homes Ltd (ID655) consider the list of developments permitted should be expanded to include older persons accommodation and brownfield sites.	The Development Plan should be read as a whole, there is no requirement to specifically reference care homes, however policy amended to refer to brownfield sites.
Developer/site promotor RPS on behalf of Bewley Homes (ID672) and Gladman (ID998) considers policy inconsistent with the NPPF and does not provide flexibility for sustainable developments outside defined settlements	Proposals for housing will be considered in line with the Development Plan as a whole. The Plan seeks to allocate sufficient sites over the plan period to meet identified need. Therefore, it is not considered necessary to specifically refer to housing developments within the policy.
LP34 Green Belt (Policy LP36 in Pre-Submission BFLP)	

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Main Issues Raised	Council's Response
Natural England (ID1012) allowance for infill should not be at the expense of habitats.	The Development Plan should be read as a whole, there is no requirement to specifically reference loss of habitats, as there will be other policies which deal with that topic area.
A resident queried why Tickleback Row/Moss End are not identified as Green Belt villages.	They do not meet the definition of village set out in the Green Belt Village Assessment (LP/ev5d). Supporting text amended to clarify the nature and approach to Green Belt villages.
Developer/site promoter Leigh (ID145) objects as inconsistent with NPPF as land should be either in or outside the Green Belt.	The purpose of defining a village envelope in some parts of the Green Belt, purely relates to identifying 'village' areas for the purposes of allowing limited infilling in line with the NPPF. These areas would remain washed over the Green Belt. Supporting text amended to clarify the nature and approach to Green Belt villages.
Developer/site promoter Leigh (ID145) the NPPF does not include a test as in para 13.2.4 to see if an outbuilding is related or not to another – any building can be replaced.	The point relates to whether existing outbuildings are closely related to and ancillary to the main building being replaced for them to be included as part of a replacement of a main building.
Developer/site promoter Leigh (ID145) supporting text para 13.2.5 seeks to introduce a test relating to whether re-use of buildings in the Green Belt is acceptable in principle	Supporting text relates to changes of use of buildings. It is noted that this a form of development which is not 'inappropriate' (para. 146d of NPPF), subject to preserving openness. The supporting text relates to matters the Council will take into consideration as part of a planning application.
Developer/site promoter Leigh (ID145) reference to basements in supporting text should be removed as have no impact on openness.	The test in the NPPF para. 145c is does not refer whether a building would look larger. Therefore, it is appropriate to leave in reference to basements as part of consideration of a disproportionate addition in relation to an extension (or materially larger in the case of a replacement building).

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Main Issues Raised	Council's Response
LP35 Landscape character and separation of settlements (Policy LP37 and LP38 in Pre-Submission BFLP)	
Developer/site promotor Lightwood Strategic (ID669) supporting text LP18 and LP35 should correlate as inconsistent. Consider it a conflict to relate character to separateness.	Policy LP35 will be split to create two separate policies, one relating to gaps and one relating to landscape character, which will then be consistent with approach in strategic policy. Supporting text in relation to the separation of settlement will be clarified.
Developer/site promotor Bracknell Land Limited and Tingdene Parks Limited (ID501) unclear what 'adversely affecting the function of the land' means.	
Developer/site promotor Pegasus on behalf of Persimmon Homes Thames Valley and Jaynic Ltd (ID1019) considers policy achieves aims of strategic gap policy so do not need designate land as a strategic gap.	
LP36 Dwellings for rural workers (Policy LP39 in Pre-Submission BFLP)	
No main issues.	
LP37 Occupancy conditions (Policy LP40 in Pre-Submission BFLP)	
No main issues.	
LP38 Equestrian uses (Policy LP41 in Pre-Submission BFLP)	
Developer/site promotor Leigh (ID145) considers covered by other policies, other than reference to British Horse Society standards, should be deleted.	The NPPF supports a prosperous rural economy, and states that in some circumstances it will be important for planning policies to ensure that development is sensitive to its surroundings among other things. The policy is considered to be consistent with the NPPF, providing local detail on an issue that is specific to Bracknell Forest.

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Main Issues Raised	Council's Response
LP39 Design (Policy LP42 in Pre-Submission BFLP)	
Developers/site promoters Boyer on behalf of Nicholas King Homes (ID654) and S2 Bracknell Ltd (ID792) consider the policy duplicates LP19.	Policy amended to avoid duplication with LP19.
Developers/site promoters S2 Bracknell Ltd (ID792) and Syngenta consider the requirements for masterplan and design code need to be clarified and unclear why they are prerequisites for planning applications. Should be reviewed on a case by case basis.	Policy amended to clarify.
Developers/site promoter Escrillion (ID721) considers site-specific circumstances, feasibility and viability will need to be considered for each site.	In accordance with the NPPF it is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.
LP40 Tall buildings (Policy LP43 in Pre-Submission BFLP)	
Historic England (ID459) considers criterion iii should include reference to the historic environment.	Policy amended to refer to heritage assets.
Winkfield Parish Council (ID984) and Binfield Parish Council (ID524) consider tall buildings should be confined to town centre or industrial areas.	It is considered the policy will ensure that tall buildings will not be approved in inappropriate locations within the borough.
Developers/site promoter Pegasus on behalf of Redrow Homes and Persimmon Homes Thames Valley (ID632) considers policy in relation to historic assets is inconsistent with the NPPF and Planning (Listed Buildings and Conservation Areas) Act 1990 which does not have a nil detriment requirement.	Policy amended to refer to detrimental impact.

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Developers/site promoter Savills on behalf of Morgan Sindall Investments (ID752) concern over definitions of a tall building. Should be increased for example 10 storeys of commercial or 12 storeys (36 meters tall) of residential.	Tall buildings have been defined in two ways, to ensure that development proposals are appropriate to their location.
Developers/site promoter S2 Bracknell Ltd (ID791) too prescriptive and parking standards impact upon delivery. Criterion ii should include transport as a consideration for appropriate locations.	It is considered that the reference to a sustainable location is sufficient to acknowledge the need for locations to be easily accessible public transport connections. Parking provision will be assessed on a site by site basis.
LP41 Advertisements and shop fronts (Policy LP44 in Pre-Submission BFLP)	
Warfield Parish Council (ID557) suggests supporting text amended to limit illumination out of hours to reduce light pollution.	Supporting text amended to refer conditions limiting hours of illumination to reduce light pollution.
LP42 Protection and enhancement of the historic environment (Policy LP45 in Pre-Submission BFLP)	
Historic England (ID459) suggested amendments to criterion 3i so non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be subject to the policies for designated heritage assets'	Policy amended to be more concise and directly relate to case law, legislation and the NPPF.
Historic England (ID459) consider an additional policy needed setting out the requirements of development proposals and providing a clear indication of how a decision maker should react to a development proposal affecting a heritage asset or assets as required the NPPF.	
Historic England (ID459) considers the Plan does not demonstrate a positive clear strategy for the conservation, enhancement and	Policy amended to be more concise and directly relate to case law, legislation and the NPPF.

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Main Issues Raised	Council's Response
enjoyment of the historic environment as required by the NPPF and is therefore not sound. Proactive measures such as a commitment to update conservation area appraisals, consideration of the use of Article 4 Direction and working with the local community needed.	The Council has a local list of buildings and structures. Supporting text sets out the commitment to work with stakeholders to conserve and enhance the historic environment (para 15.1.2).
Historic England (ID459) consider the selection criteria for local listing should be amended to account for other types of heritage assets such as parks and gardens and policy should make it clear that Local Authorities or neighbourhood plans can add further assets to the list.	Supporting text amended to refer to the potential to explore extending the categories of assets to the local list and to refer to the ability of the Local Authority or qualifying body producing a neighbourhood plan to add further to the local list.
A number of developers/site promoters consider the policy is not consistent with the NPPF as it does not allow a balanced judgement (determining the degree of harm and then weighing that against public benefits).	Policy amended to be more concise and directly relate to case law, legislation and the NPPF.
LP43 Biodiversity (Policy LP46 in Pre-Submission BFLP)	
Binfield Parish Council (ID524) consider the hierarchy does not make it clear that compensation is a last resort.	Supporting text amended to clarify that compensation is the last resort.
Environment Agency (ID959) suggest the policy should include a reference to ecological buffer zones and culverts, 'enhancing' ecological features. It is also considered that the supporting text should refer to opportunities for natural flood management to enhance biodiversity.	De-culverting rivers and buffer zones are included in policy LP15 Green Infrastructure, so it is not necessary to include. Policy amended to refer to enhancing ecological feature. Supporting text amended to refer to opportunities for natural flood management should be considered.
A number of residents and BBOWT (ID341) consider farmland should be subject to biodiversity net gain and recommend that	Net gain for biodiversity includes consideration of the ecological value of farmland. The Council will have a duty to consider the conservation of farmland birds that are Species of Principal

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Main Issues Raised	Council's Response
farmland bird mitigation is added to the policy as they won't be captured by the DEFRA biodiversity metric for calculating net gain.	Importance under the NERC Act. As with all protected species, on site mitigation will be preferred in line with current guidance.
A resident queried how biodiversity will be delivered, monitored and managed.	The Council will publish a biodiversity net gain strategy/delivery plan and the cost of biodiversity credits will be designed to include the cost of management and monitoring.
BBOWT (ID340) consider that the biodiversity net gain target should be 20% and Natural England (ID1012) consider a biodiversity net gain target of at least 10% is appropriate.	Policy amended to include a minimum 10% biodiversity net gain.
BBOWT (ID340) concerned that the policy does not refer to irreplaceable habitats (including, but not limited to, ancient woodland and veteran trees).	The supporting text of policy LP45 Protection and Enhancement of Trees and Hedgerows now includes a reference to this.
Developer/site promotor (ID763) Willson Development considers would be difficult to define what intentionally remove or degradation is and reference to this should be deleted from supporting text and that undoing neglect and improving a habitats' future prospects should be considered a mitigation measure.	Supporting text amended to include examples of intentional habitat degradation and how it will be determined that habitat has been degraded.
LP44 designated nature conservation and geological sites (Policy LP47 in Pre-Submission BFLP)	
Environment Agency (ID960) considers: <ul style="list-style-type: none"> the policy should refer to protecting species, 'normally' should be deleted from criterion point 1 ii to strengthen the policy and ensure SSSI are protected, and, point 1 iii wording should be amended so that development proposals on or affecting locally designated sites will not normally be permitted 	<ul style="list-style-type: none"> Protected species are included in policy LP43 Biodiversity, Criterion point 1 ii wording reflects the NPPF. Policy amended to reflect that development proposals on or affecting locally designated sites will not normally be permitted.

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A resident has queried how in combination impacts, such as for air quality, be assessed	Relevant large developments are currently required to carry out an in-combination air quality assessment to provide information for the Habitats Regulations Assessment. The Council is currently working with Natural England and depending on the results of the BFLP air quality assessment, future requirements will need to be agreed with them.
Developer/site promotor Escrillion (ID723) considers policy needs to define what constitutes a large development.	This will be set out in accompanying guidance.
LP45 Protection and enhancement of trees and hedgerows (Policy LP48 in Pre-Submission BFLP)	
Natural England (ID1012) consider the policy should refer to importance of trees and hedgerows in absorbing pollution.	Supporting text amended to refer to the absorption of pollution.
BBOWT (ID342) concerned no reference to irreplaceable habitats.	Supporting text amended to refer to irreplaceable habitat.
A resident considered the supporting text weakens the policy by allowing applicants to provide off site compensatory planted.	Supporting text amended to include the requirement to demonstrate why compensatory planting cannot be providing on site.
A resident queried why landscaping strategies may not be submitted with a planning application.	Supporting text amended to clarify that, as a minimum a landscaping strategy or an indicative landscaping scheme will be required prior to determination of a planning application, the detailed planting specification could be conditioned.
Developer/site promotor Escrillion (ID723) objects to the policy as it has the potential to undermine the viability and feasibility of new schemes coming forward.	Policy sets out the planning requirements, and if there is reason for development to deviate away from such requirements, this would need to be demonstrated.

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LP46 Sustainable construction (Policy LP49 in Pre-Submission BFLP)	
Binfield Parish Council (ID524), Winkfield Parish Council (ID894) and a resident consider the zero carbon requirement should apply to all development, not just major.	Smaller developments may have more difficulties in meeting a net zero carbon requirement, therefore the policy includes less stringent carbon emissions standard for smaller developments.
Warfield Parish Council (ID557) considers a percentage of new homes should include renewables	De-centralised renewable energy can be used to contribute towards meeting the net zero carbon or the 19% improvement in emissions policy requirements.
Developer/site promotor Gladman (ID716) consider policy should reflect the NPPF and the optional technical standards for new housing.	Local planning authorities are still able to set and apply policies in their Local Plans which require compliance with energy performance standards that exceed the energy requirements of Building Regulations under the provisions of the Planning and Energy Act 2008.
Developer/site promotor Gladman (ID716) and Pegasus on behalf of Redrow Homes and Persimmon Homes Thames Valley (ID632) consider requirement should be subject to viability assessment.	The draft Local Plan Viability Testing Report has assessed the cost implications of the policy. It is considered that the policy is flexible as if it is demonstrated to be not viable, then the requirements do not have to be met.
A number of developer/site promoters consider the zero carbon home requirement too onerous.	
Developer/site promotor Willson Development (ID763) and Syngenta consider clarification need on the definition of zero or low carbon policy and implication of the Future Homes Standard.	Supporting text amended to clarify the definition of net zero carbon. There is some uncertainty as to the future national requirements for both residential and non-residential buildings, which are currently are subject to review/consultation and likely to change soon. Whilst some elements of the policy require improved sustainability compared to the proposed national standards, others

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Main Issues Raised	Council's Response
	are likely to be superseded by more stringent national requirements in the future. The latest documents confirm that Local Plans are still able to set still able to set local energy efficiency standards for new homes.
LP47 Renewable and low carbon energy (Policy LP50 in Pre-Submission BFLP)	
No main issues.	
LP48 Sustainable Drainage Systems (SuDS) (Policy LP51 in Pre-Submission BFLP)	
Developer/site promotor Wilson (ID763) consider that policy should be amended so development should be permitted if all the following criteria are met 'where possible'.	Policy amended and part referred to deleted however, relevant developments are required to meet the criteria.
LP49 Pollution and hazards (Policy LP52 in Pre-Submission BFLP)	
Natural England (ID1012) and a resident raised concerns regarding air pollution, including impact on Thames Basin Heaths SPA and Air Quality Management Zones.	An air quality assessment of the BFLP is progress. The Council is aware that air quality mitigation measures may be required which may then need to be incorporated into policy and supporting guidance.
Warfield Parish Council (ID557), BBOWT (ID344) and a resident raised concerns regarding artificial lighting especially in rural areas and on greenfield sites.	Addressed by LP39 'Design' which seeks appropriate lighting having regard to impacts on biodiversity and character of the area, particularly in rural and semi-rural parts of the Borough. The Development Plan should be read as a whole.
Developer/site promotor Pegasus on behalf of Redrow Homes and Persimmon Homes Thames Valley (ID632) consider the policy should be amended to make clear that proposals will be assessed against the residual adverse effects (i.e. with mitigation in place)	The supporting text sets out that relevant information to be provided by applicants at the planning application stage.

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Main Issues Raised	Council's Response
and will only be resisted in such locations if the residual effects are unacceptable. The extent to which noise and air influence development should be addressed the planning application stage.	It will be for the decision maker on a case by case basis to determine if the mitigation proposed is acceptable.
LP50 Development of land potentially affected by contamination (Policy LP53 in Pre-Submission BFLP)	
No main issues.	
LP51 Assessing transport impacts and requirements (Policy LP54 in Pre-Submission BFLP)	
Binfield Parish Council (ID524) consider policy should refer to electric vehicle charging points.	Policy LP54 seeks car charging infrastructure and LP23 seeks to reduce greenhouse emissions. The Development Plan should be read as a whole.
Winkfield Parish Council (ID894) and Natural England (ID1012) consider policy should promote more sustainable modes of travel to reduce emissions/become zero net carbon.	
LP52 Transport infrastructure provision (Policy LP55 in Pre-Submission BFLP)	
Binfield Parish Council (ID524) and Winkfield Parish Council (ID894) consider policy should refer to electric vehicle charging points or parking hubs for smart vehicles.	Policy LP54 seeks car charging infrastructure and LP23 seeks to reduce greenhouse emissions. The Development Plan should be read as a whole.
Developer/site promotor S2 Bracknell Ltd (ID790) considers clarification needed on requirement to provide taxi and rail infrastructure.	Supported text amended to clarify that applies to development near railway stations.
Developer/site promotor S2 Bracknell Ltd (ID790) considers policy needs to reflect that CIL is the primary funding source for new infrastructure and make clear that it reflects site-specific mitigation as required by the CIL regulations.	The rationale for seeking Section 106 and CIL is in the Planning Obligations SPD.

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Main Issues Raised	Council's Response
LP53 Travel Plans (Policy LP56 in Pre-Submission BFLP)	
No main issues.	
LP54 Parking (Policy LP57 in Pre-Submission BFLP)	
Natural England (ID1012) wish to see no new publicly accessible car parks within the 400m zone around the TBH SPA.	In accordance with Policy LP17 Thames Basin Heaths SPA (pre-submission numbering) any proposals for new car parks within 400m of the TBH SPA will require a Habitats Regulations Assessment in consultation with Natural England. Such proposals will only be able to proceed if it is established that there is no likely significant effect on the integrity of the TBH SPA.
Developer/site promotor S2 Bracknell Ltd (ID789) objects as any requirement to increase the amount of parking (as per ii), in sustainable Town Centre locations should be removed. Current parking standards do not reflect this, and conflict with the NPPF aspiration to deliver high density housing in sustainable locations.	It is considered that criterion ii provides clear caveats as it states "...where identified being appropriate and needed". When there is demonstrated evidence to deviate from the parking standards it will be considered as a material consideration in the determination of planning application.
Appendix 2 Housing Trajectory (Appendix 1 in Pre-Submission BFLP)	
Warfield Parish Council (ID550) and residents/resident groups raised that needs to reflect complex sites take longer to develop.	The trajectory has taken into account lead-in times of when an application could be expected following adoption of the BFLP, and allowing for pre-app, approval of an application and associated conditions. An updated trajectory and housing land supply (HLS) will be published the Pre-submission BFLP (2021).
Developer/site promotor Turley on behalf of Berkeley Strategic Land Ltd (ID565) consider first completions and annual deliver rates unrealistic.	

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Main Issues Raised	Council's Response
Developer/site promotor Turley on behalf of Berkeley Strategic Land Ltd (ID565) considers additional land needed as there is not a rolling 5 year supply due to 20% Housing Delivery Test buffer.	The latest Housing Delivery Test results (2019 and 2020 measurements', which were published February 2020 and January 2021) confirm the Council only needs a 5% buffer. An updated trajectory and HLS will be published with the Pre-submission BFLP (2021).
Developer/site promotor Pegasus on behalf of Persimmon Homes Thames Valley & Jaynic Ltd (ID1016) consider housing trajectory is reliant on a number of sites (including Derby Field and Jealott's Hill) that do not meet criteria set out in NPPF paragraph 6.19.	It is considered that the sites can be included. For comments on Derby Field and Jealott's Hill, see responses to site specific policies, and justification contained in the Housing Background Paper.
Appendix 4 Site profiles for sites proposed for allocation (Appendix 2 in Pre-Submission BFLP)	
A number of comments from residents/resident groups regarding the site requirements for Jealott's Hill and the concept plan being incorrect (copses and landshare not shown).	Land at Jealott's Hill profile to be removed as requirements are set at in the land at Jealott's Hill policy and supporting text. Jealott's Hill policy requires provision of orchard within the community landshare, it is considered that indicating the location of the orchard within the community landshare on the illustrative concept plan would be an inappropriate level of detail.
Developer/site promotor Wellington College (ID967) consider the settlement boundary amended to include the whole of Derby Field allocation.	The Landscape Sensitivity Appraisal (CLP/Ev/5e) recommends that a gap is preserved between development on this site and the linear development to the south. Including open space within this area would make effective use of this land.
Appendix 9 Existing policies to be replaced by BFLP (Appendix 6 in Pre-Submission BFLP)	
Developer/site promotor Woolf Bond Planning on behalf of Warfield Park Homes (ID574) object to the replacement of existing Bracknell Forest Borough Local Plan Policy EN11 (relating to Warfield Park Mobile Home Site) with Policies LP33 and LP35.	The site is located within the countryside; Policies LP33 and LP35 will ensure that any development at Warfield Park respects and enhances the intrinsic character of the countryside, and thus

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Main Issues Raised	Council's Response
	protects the character of Warfield Park. The policies are informed by relevant and up to date evidence.

9. Other consultations

- 9.1. In addition to the formal stages of consultation, additional engagement was undertaken throughout the process, particularly with statutory bodies and Duty to Cooperate bodies. This informed the development of the BFLP, supporting documents and the evidence base. A number of the evidence base documents are joint studies with other Councils such as the Employment Land Needs Study (LP/Ev/3e) or involved close engagement with statutory bodies and Duty to Cooperate/statutory bodies such as the Environment Agency during the preparation of the Strategic Flood Risk Assessments (LP/Ev/9d, e, f, h, I and I) and the Water Cycle Study (CLP/Ev/4c). The engagement and outcome of discussions with Duty to Cooperate bodies is set out in the Draft Interim Duty to Cooperate Statement (LP/Ev/10q)¹⁶.

¹⁶ Duty to Cooperate Statement: <https://www.bracknell-forest.gov.uk/planning-and-building-control/planning/planning-policy/development-plan/draft-bracknell-forest-local-plan/evidence-base>
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Interim Consultation Statement
(Version for Executive/Council March 2021)