

**TO: THE EXECUTIVE
13 JULY 2010**

**LOCAL DEVELOPMENT FRAMEWORK - SITE ALLOCATIONS DEVELOPMENT PLAN
DOCUMENT**

Director of Environment, Culture and Communities

1 PURPOSE OF DECISION

- 1.1 The Site Allocations Development Plan Document (SADPD) is intended to identify sites to meet the Borough's development needs to 2026. This report seeks approval to revise the programme for further stages in the preparation of the SADPD in light of changes to national policy on local planning.
- 1.2 The report provides feedback on the options consultation on the SADPD and an indication, in the form of a working paper, of a potential pattern of development based on reduced housing numbers and a number of other assumptions, that could form the basis of further consultation.

2 RECOMMENDATION(S)

- 2.1 That Executive agrees to defer the preferred option consultation on the SADPD to Autumn 2010.
- 2.2 That Executive notes the content of the Indicative Option Working Paper at Appendix C which could form the basis of future consultation subject to the review of the Borough's housing target.
- 2.3 That further work continues on the following:
- further analysis of options consultation responses,
 - production of a revised programme for the remaining stages of the SADPD as further clarity emerges from Government,
 - masterplanning of potential sites and further discussions with landowners/developers on the development and infrastructure delivery potential for urban extension sites,
 - completion as soon as possible of the Supplementary Planning Document for the South Warfield area as identified in the Core Strategy,
- 2.4 That, based on the housing numbers in the adopted Core Strategy and the rationale at paragraph 5.7 below, the following Broad Areas identified in the Options Consultation be excluded from consideration for development up to 2026:
- Broad Area 1 – South West Sandhurst
Broad Area 6 – North Warfield
Broad Area 7 – Chavey Down – Longhill Road
Broad Area 8 – East Bracknell**

3 REASONS FOR RECOMMENDATIONS

- 3.1 The SADPD will be an important element in delivering the vision set out in the Council's adopted Core Strategy and ensuring a robust and flexible supply of land to meet the Borough's future development requirements.

- 3.2 Since the Executive agreed the options consultation a number of changes have occurred which affect the SADPD. These include
- The formation of the coalition government;
 - The publication of a ministerial letter stating that Regional Strategies will be abolished, that decisions on housing supply (including the provision of travellers sites) will rest with Local Planning Authorities without the framework of regional numbers and plans and that formal announcement will be made soon;
 - The publication of a replacement PPS3 which excludes private residential gardens in built-up areas from the definition of previously developed land and withdraws the indicative minimum density for residential development of 30 units per hectare; and,
 - The release of a letter from the Secretary of State for Communities and Local Government to the Chair of the Economic Affairs Committee seeking clearance for announcement of the revocation of Regional Strategies and regional housing targets along with a draft Written Ministerial Statement.
- 3.3 The changes announced by Government affect the basis on which the options consultation was carried out and provide an opportunity for the Council to review the housing target set in the final version of the Regional Spatial Strategy (the South East Plan). The final version increased the number allocated to Bracknell Forest by 2,000 over the figure submitted by the Council at the 'Option 1' stage and (which is also the figure the Core Strategy is based on). In light of this it is considered appropriate to review the SADPD programme and level of housing before carrying out the preferred option consultation in the Autumn on the Site Allocations DPD which had been scheduled for July / August 2010.

4 ALTERNATIVE OPTIONS CONSIDERED

- 4.1 The option of continuing with the current programme and consulting on a preferred option in July/August based on the adopted regional figures considered but since the Council did not support this figure at the time the South East Plan was prepared it would be more appropriate to carry out a review. There are risks associated with delaying the programme for an extended period and it is therefore proposed that work should continue to a revised programme including a review of the housing target for the Borough.
- 4.2 The option of ceasing all work on identifying sites for future development was considered. This could create additional delay and leave the Council vulnerable to the pattern of development in the Borough being led by developers and land owners through planning applications and planning appeals.

5 SUPPORTING INFORMATION

The Options Consultation

- 5.1 Stage 1 of the options consultation on the SADPD sought views on the potential locations for future development in the Borough. It commenced on 26th February and ran for seven weeks (ending on 16th April). The consultation attracted just over 7,000 individual written comments from over 1,300 individuals and organisations. Comments were also made at the manned exhibitions which have also been noted

and summarised. A summary of the comments received on the eight potential broad areas for development is attached at Appendix A.

5.2 A second stage of consultation during May 2010 comprised a series of four local events which between them considered all the eight potential new development areas in more detail with invited representatives from local residents associations and amenity groups along with Parish and Borough Councillors. These were facilitated by masterplanning consultants, Urban Initiatives supported by planning officers.

5.3 The evening events were held as follows:

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| • Warfield (Site 6 and Warfield SPD) | 10 May |
| • Binfield (Sites 4 and 5) | 11 May |
| • Sandhurst & Crowthorne (Sites 1,2 and 3) | 13 May |
| • Winkfield (Sites 7 and 8) | 26 May |

(site numbers refer to the site numbering used in the SADPD consultation material).

Responses to the Consultation

5.4 The focus of public attention has mainly been on the options for major housing development locations. Because of the number of comments received it has taken some time to upload them onto the database. This has now been completed and the comments can be viewed via the website and hard copy reports can be provided on request. A report of the consultation highlighting the main issues raised will be published as soon as possible.

5.5 A summary of the responses from the statutory consultees on the potential development areas is attached at Appendix B. The responses from statutory undertakers and national bodies do not raise any fundamental objections to the principle of developing any of the broad areas identified. They do highlight particular infrastructure concerns, notably the Highways Authority who highlight the need for improvements to Junction 10 of the M4 related to any development in the north of the Borough and Junction 3 of the M3 in the south.

5.6 The majority of other responses related to the question about the eight potential broad areas and their suitability for development. An initial summary of the comments received on each of the potential broad areas is attached at Appendix B. Concerns about most of the sites included:

- Infrastructure capacity (including transport, schools, health and leisure)
- Impact on existing character / communities
- Loss of open space
- Impacts on flora, fauna and landscape
- Flooding / drainage / sewage issues
- Pollution

5.7 Following the options consultation and government policy announcements, work has continued on the basis of the lower housing target from the Submission version of the South East Plan (10,780) which is also the basis for the target in the adopted Core Strategy. This has focussed on the urban extensions section of the SADPD and follows a rationale that can be summarised as follows:

- Prioritising the use of previously developed land (parts of Broad Areas 2 and 3)

- Prioritising the use of land with the best links to Bracknell, the Borough's most sustainable settlement, (the southern parts of Broad Areas 4 and 5)
- It has emerged that the majority of Broad Area 8 will not be available for residential development during the plan period so this land has been eliminated and a small part of the area identified as a possible 'rounding-off' site.
- It has become clear that a significant area at the centre of Broad Area 6 will not be available for residential development and that without this land it would not form a coherent urban extension.
- Elimination of the broad areas that would form extensions to less sustainable settlements and that performed less well against sustainability objectives (Broad Areas 1 and 7 and much of the northern parts of Broad Areas 4 and 5 around Binfield)
- In light of the number of homes now being considered in the North of the Borough and the priority to use previously developed land it is not proposed to pursue the concept of a 'Northern Arc' of development. This concentration of development did not appear to be a critical issue in the responses on the Infrastructure Delivery Plan.

5.8 The current working paper illustrating the outcome of this approach is attached at Appendix C and is based on the following assumptions:

- That the recent change to PPS3 in relation to residential gardens no longer being classified as previously developed land will not significantly affect the allocation of garden land sites within the Strategic Housing Land Availability Assessment.
- That the change in PPS3 to delete the indicative national minimum density of 30 homes per hectare will not result in significantly lower densities being proposed for the identified sites, including those within the urban area (i.e. if lower densities are adopted, more land will be required for a given number of homes).
- It presents a scenario based on the 'Option 1' housing figure submitted during preparation of draft South East Plan and is also effectively the same figure as in the adopted Core Strategy. This is 2,000 lower than the 12,780 included in the final version. The draft Ministerial Statement says that RSS targets can be replaced with 'option 1' numbers, if that is the right thing for the area, and that any target selected will need to be defended by the local authority during examination and will be tested for soundness.

Changes in Government Policy

- 5.9 A letter sent to Council Leaders by the Rt Hon Eric Pickles the new Secretary of State for Communities and Local Government has made it clear that Regional Strategies will be rapidly abolished and decision-making powers on housing and planning will be at local council level supported by a national policy framework. This followed the Queen's Speech which included reference to a Decentralism and Localism Bill which will give councils more powers over housing and planning decisions.
- 5.10 A further letter has been released from the new Secretary of State for Communities and Local Government to the Chair of the Economic Affairs Committee seeking clearance for announcement of the revocation of Regional Strategies and regional housing targets along with a draft Written Ministerial Statement. The draft statement gives an indication of the form of the interim arrangements likely to be put in place

pending the publication of the 'Localism Bill' and the National Planning Policy Framework. It includes the following points:

- Current national Planning Policy Statements will continue to apply, apart from the Policy Statement on Regional Strategies (February 2010);
- Preparation of LDF documents should continue;
- Adopted DPDs and saved policies will continue to provide the statutory planning framework;
- Authorities can review or revise emerging policies in the light of the revocation of Regional Strategies;
- This can include a review of the Borough Housing target (including a change to "option 1 numbers") – but any such review will need to meet the requirements for soundness under the current legislation and be defensible at examination;
- The Council will still need to provide a 5 year supply of housing to provide for the level adopted;
- Local Authorities will have responsibility for determining the right level of site provision for travellers, which should be done in line with current policy. Gypsy and Traveller Accommodation Assessments already undertaken will form a good starting point but Local Authorities are not bound by the methodology adopted by the Regional Planning Bodies;
- Local Authorities must continue to use PPS4: Planning for Economic Growth in preparing LDFs
- The government is committed to the protection of the Green Belt.

- 5.11 The abolition of Regional Spatial Strategies (RSSs) will have major implications for the SADPD as the RSS presently provides the housing and employment targets which provide the basis for this work. The government's intention to abolish RSSs is already causing the SADPD programme to be questioned. The Panel report on the partial review of the South East Plan relating to provision for gypsies and travellers and travelling showpeople was expected imminently but it is now unlikely to be published.
- 5.12 The abolition of the RSS will remove the regional and sub-regional context within which the Core Strategy and other policy documents have been prepared. The changes will provide an opportunity to review Bracknell Forest's future role and Bracknell's identified role in the RSS as a sub-regional hub. It appears from the draft Ministerial Statement that the Core Strategy will remain in force during the transition period.
- 5.13 The government has also recently re-issued PPS3 (national planning guidance on housing). The changes include the removal of residential gardens from the definition of previously developed land. This change will affect the assumptions that we use for the supply of homes from small sites (less than 10 units net) and potentially the numbers of homes that are likely to be achieved from other sites within existing settlements. This in turn will affect the number that needs to be found from greenfield sites.
- 5.14 The other change in the new PPS3 is the deletion of the national indicative minimum density of 30 homes per hectare. The options consultation was carried out on the basis of site capacities arising from development densities of 35 and 40 units to the hectare. In light of this change in national guidance it may be appropriate to review this work and consider lower density options. There are, however, a number of implications that arise from lower densities of development including a greater land

requirement, less ability to support public transport facilities and higher levels of car usage to access facilities. Despite removing the national indicative minimum density, the government is still emphasising the need for sustainable development.

Revised Timetable

- 5.15 In light of the changes in national planning policy described above, and in order to maintain progress on site allocations, it is therefore proposed to defer the next stage of the process (the preferred option consultation) to autumn 2010. This is likely to follow a report to the October meeting of the Executive to agree the preferred option and consultation methodology.

Infrastructure Delivery Plan

- 5.16 The Infrastructure Delivery Plan (IDP) is planned to accompany the SADPD and specify, in as much detail as possible (on the available information) the physical, social and green infrastructure needed to enable the planned growth up to 2026. The IDP includes a delivery schedule that sets out who will provide the infrastructure and when it will be delivered. The first version of the IDP includes the infrastructure requirements for the 8 broad areas which were included in the SADPD participation document. As the SADPD progresses, and the scale and pattern of development are refined, the IDP will become more detailed.
- 5.17 In addition to the broad areas, the final IDP will also cover the infrastructure requirements for the smaller sites within the settlements. This will be set out by area and will predominantly use the approach set out in Limiting the Impact of Development SPD. The IDP will assess the cumulative impacts of the small sites on the existing infrastructure provision within the settlements. In the current draft IDP the broad areas have been considered in isolation from each other. At the time we consult on a preferred option, infrastructure providers will be engaged with again to consider infrastructure requirements in more detail, including any possible cumulative impacts and the potential to co-locate some facilities.

6. RISK ASSESSMENT

- 6.1 The risks associated with the proposed SADPD work are:
- The lack of up to date legislation and guidance on the new planning system;
 - The interim arrangements are presently in the form of a draft Ministerial Written Statement; and,
 - The Council has not taken a formal view on the its approach to changes in PPS3 relating to garden land and density.
- 6.2 There is also some risk from potential speculative planning applications and possible appeals. However, the Secretary of State's letter of 27 May will be a material planning consideration in any appeal decisions, as will any formal Ministerial Written Statement on interim arrangements.
- 6.3 As the SADPD is still at the Regulation 25 stage of preparation which is an informal engagement stage the risk of proceeding on the basis outlined in the preceding section is less serious than if were about to embark on a formal stage. The national situation should be clearer by the time decisions are made on the publication and submission of the SADPD.

7 ADVICE RECEIVED FROM STATUTORY AND OTHER OFFICERS

Borough Solicitor

7.1 Nothing to add to report.

Borough Treasurer

7.2 Following the in-year savings and loss of the Housing and Planning Delivery Grant, and likely ongoing staff savings, reduced resources are available to take forward the Site Allocations DPD at this time and it would not be possible to complete the necessary technical reports (including transport modelling and viability testing) and other work to support the production of a final submission version on the previously agreed timescale.

7.3 Any return to complete this work, or indeed a new Local Plan as has been suggested, will require new money to be found to support the evidence and engagement needs arising from the process. The commitment budget includes a projection which represents the estimated work in preparing the LDF as part of a continuous rolling programme. The current years budget is reviewed through the budget monitoring process.

Equalities Impact Assessment

7.4 The allocation of land for different uses which is the key function of the SADPD has the potential to advantage some groups at the expense of others. Carrying out full and effective consultation on its proposals is therefore an important part of ensuring that no equalities groups are unfairly disadvantaged. An important part of the SADPD will be to ensure that new development contributes to the achievement of sustainable communities which have good access to a wide range of facilities including employment, education, health facilities, open space and community facilities (community halls, places of worship etc). In this respect the SADPD should have a positive role in reducing inequalities in the Borough.

Strategic Risk Management Issues

7.5 Strategic Risk Register - Number 4 identifies the risks arising from the increased housing allocations and the implied 'jobs allocations' in the final version of the South East Plan. A particular trigger for this risk is identified as houses being built without accompanying improvements in infrastructure

7.6 The potential adverse consequences are identified as:

- Demands on services increase;
- Infrastructure is put under pressure;
- Transport system under pressure;
- Area becomes less attractive to employers;
- Risk of unemployment;
- Area becomes less attractive place to live;
- Residents complain; and,
- Image of Council damaged

7.7 Given the uncertainties and risks identified at Sections 5 and 6 above it is not considered appropriate to continue production of the SADPD on the previous timetable, but the revised programme proposed above will help to reduce the risks as will carrying on with Warfield SPD to improve our housing land supply.

8 CONSULTATION

8.1 Details of the options consultation are set out at Section 5 above.

Background Papers

Appendix A – Summary of comments on the eight potential broad areas

Appendix B – Summary of comments from statutory consultees

Appendix C – Broad Areas Indicative Preferred Option Document (Final Draft 17/06/10)

Site Allocations Development Plan Document p Participation Document February 2010

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