



Response to the Bracknell Forest Draft Local Plan (2018) from the Winkfield Row Residents Association (WRRA)

The following comments are made by the WRRA committee on behalf of the WRRA following a review of the draft local plan documents and consultation with the membership and other local residents.

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The Consultation Process

What follows is a series of comments regarding the nature of the Consultation Process undertaken by BFBC in respect of the Draft Local Plan. By their very nature some of these comments might be considered premature, needing to be submitted before the Consultation deadline expired on March 26th to be taken into account. However, we do not doubt their validity.

1. Not all the Local Plan documents were available on the Planning website from the start of the consultation process. The Infrastructure Delivery Plan & Sustainability Assessments were posted part way through. We feel that this delay has inevitably put some residents at a disadvantage when trying to understand the Plan and therefore compromised the process, since no compensating extension to the consultation period was offered.
2. NPPF paragraph 155 states:

“Early **and meaningful engagement** and collaboration with neighbourhoods, local organisations and businesses is essential. **A wide section of the community should be proactively engaged**, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.” (~~our emphasis~~)

BFC may choose to respond to this comment by listing all the emails and websites in which it has posted details of consultations as evidence that it has fulfilled its obligations. In strict, legal terms, this may be correct. However this, rather minimal approach to publicity and engagement, while within the letter of the law, has clearly not been carried out in the

spirit of the Planning Framework quoted above. The general public have been largely unaware of the development of the Local Plan and most, if not all, have struggled to assimilate the vast amount of information produced by the Council in the time allotted. The Draft Local Plan comprises nearly 1000 pages of documentation plus further documents in the evidence base, in total numbering approx. 4500 pages, equivalent to nearly three times the length of War and Peace!

We feel it is completely unreasonable to expect lay people to be capable of assimilating this huge body of information, most of it written by professional planners, working over many years and phrased largely in “planning speak”, within six weeks. Not only that. They have to respond. But they can’t respond with their views and opinions In order for their comments to “cut any ice”, as Cllr Turrell puts it, their comments have to be ‘evidence based’. How are residents supposed to collect original data capable of challenging those produced by the Council’s staff of full time employees, all within six weeks of their first sight of the four thousand plus pages?

3. An example of the lack of significant profile given to the LP publicity. Town and Country magazine was listed as a method of publicising the LP to general public. An article was included in the March issue (during the consultation period) on p16 out of 20. If the Council’s intention was to foster “[early and meaningful engagement](#)” one wonders why it wasn’t included in a more prominent position.
4. WRA has consulted with other Residents’ Associations within the Borough and has found no evidence of direct engagement initiated by BFC with such groups associated with the consultations on various elements that comprise the local plan e.g the Draft Local Plan consultation, SHELAA, Issues and Options. The BFC **Statement of Community Involvement (SCI)** lists “**targeted communication** to specific groups, **including residents groups**” as a consultation method but the Council opted not to use them. Why?
5. The **BFC Statement of Community Involvement section 3.1.1** lists required consultation considerations e.g. :
 - The need to reach a **cross-section** of the community (over a dozen discrete groups are itemised, including those of different gender, racial origin and sexual orientation)
 - **How much time** people have to contribute to the process
 - The **nature of consultees**: are they professionals, inexperienced, individuals, or representatives of a group?

None of these seem to have been acted upon by BFC in the consultation process.

6. Why are resident groups not considered to be voluntary groups under “general consultation bodies” in the SCI?
7. The nature of BFC’s half-hearted attempts at engagement is evidenced by the SHELAA consultation. Only four members of public participated in this. BFC have also advised the WRRRA that there is no breakdown of respondents by category relating to the Issues and Options consultation. BFC are thus unable to evidence that this consultation was in any way more successful than the SHELAA process in terms of engagement with members of the public.
8. The **RTPI consultation guidelines** document contains many recommendations **that if genuinely adopted** by BFC could greatly **improve future** engagements with residents. <http://www.rtpi.org.uk/media/6313/Guidelines-on-effective-community-involvement.pdf>

The recommendations include:

“Measuring success in community engagement by evaluating the quality and quantity of subsequent interactions, and by periodically reviewing the relationship to determine whether further actions are necessary”

9. Duty to Co-operate – WRRRA can find no evidence of meaningful engagement with the NHS with regard to delivery of health care infrastructure. The issue of health carries great importance, particularly in Winkfield Parish, which, despite being the second largest parish in England, contains not a single GP surgery. The WRRRA is concerned that this draft LP appears to have been developed without the necessary degree of consultation with the health service.
10. There is similarly no evidence of consultation with Education providers. The sustainability appraisal states that work is still required with regard to education. How can the Plan be taken seriously if this area has not been adequately researched? Two new schools are proposed in Hayley Green and Winkfield Row. What is the rationale for this? The education requirements that are included in the plan are far too vague. For example, it is unclear whether **any** thinking has been done or decisions made about number of school places needing to be allocated to individual sites post development (e.g. Cluster 5, Winkfield Row)

11. There has been no link officer made available to the Winkfield Parish Neighbourhood Plan Steering Group. If the Council were serious about proactive engagement with the community, this group would have been an ideal place to start.
12. The exhibitions that were provided were more information delivery events rather than consultation with residents. We attended 5 (Binfield am and pm; Carnation Hall am and pm and Warfield Sat am). There was no obvious attempt made by BFC at any of these events to capture comments made by residents. If they were captured it would have been after the fact, it being difficult to talk and write at the same time. No recording devices were in evidence. The accuracy of any resident comments noted and responses given must therefore be subject to considerable doubt.
13. Winkfield Row exhibitions: Carnation Hall 27th and 28th Feb 201. The room was far too small (4.5mx5.5m). It was crowded and residents complained about problems in getting to ask questions due to numbers of people and noise. No events were held at the weekend so working people were disadvantaged. Other options were offered to BFC by the WRRRA and Winkfield Parish Council but were refused. Winkfield Parish Council also asked whether the consultation period could be extended or additional events held to enable a greater proportion of residents to participate in the Consultation. These requests were also refused.
14. WRRRA asked BFC whether they would be willing to address a public meeting of residents at a local school hall. WRRRA agreed to hire the hall at their own expense and to chair and police the meeting to ensure that a civilised and constructive debate and dialogue could result. The Council refused this offer several times, commenting that “From our experience” the ‘manned exhibitions’ (see Carnation Hall above) were the best means of consulting with the public. When asked for evidence that this was so, none was forthcoming.
15. The online BFC LP response form required residents to go through a registration process in order to submit their views. This process added a further barrier to participation, particularly for those residents not familiar with the internet. Several residents commented to the WRRRA that the online response process was not easy to follow.

Sustainability Assessment (LP/Ev/1b) - Cluster 5

1. In terms of sustainability, the WRRAs feel that Cluster 5 is not appropriate for the proposed scale of development.
 - 1.1. It lacks services and transport links and 25% of the SA objectives are ranked as **very negative** (SA4a, SA4b, SA6 and SA7)
 - 1.2. Table 12 of the Sustainability Appraisal categorises **63%** of sustainability objectives as having a **negative** scoring. This is by far the highest of all the proposed sites.

Without predetermined benchmarks against which sustainability scores are to be considered acceptable or unacceptable, it is impossible to understand the criteria by which sites have been evaluated. In any future Local Plan such criteria, assuming they exist, need to be explicit, such that the rationales for scores can be understood and subject to reasonable scrutiny.

2. SA9 is ranked as positive for Cluster 5. However, the only **employment** opportunity (aside from temporary construction work for the new development itself) is an undefined size of school. Is it 1 form or 2 form? The IDP does not specify. Wink 22 and Cluster 7 both have schools allocated but achieve a “neutral” score. This appears to be an **inconsistent** approach to assessment.
3. **Health Objective** SA 12 is ranked as positive, however:
 - 3.1. There is no clearly identified provision within the LP to improve **GP capacity**. Additional capacity would be needed to meet the needs of the increased population resulting from the development. The closest surgeries are Green Meadows and Gainsborough. No evidence is offered in the Plan to demonstrate that this existing provision has capacity to cope with the inevitable increase in demand.
 - 3.2. **Road safety** is an issue – the proposal includes a spur road from the B3017 through the high density residential area to the South of Forest Road. The B3017 is a very busy “B” road, acting as a key route between M3 / M4, Windsor / Bracknell.
 - 3.3. The proposed **repositioning** of the Braziers Lane/Forest Road / Locks Ride **junction** would result in complex movements of vehicles in an area that is in close proximity to two schools. This will almost certainly have a **negative impact** on health due to road safety issues.

4. **SA17 Travel choice – Mitigation** measures are included for Cluster 5 however realistically the infrastructure enhancements are not going to have a significant impact on car use. Cycle paths and subsidised bus routes (infrequent and not going where and when you want them) **will not** have a significant impact. In fact it was recently reported in the local press that Bracknell has seen the greatest reduction in bus services of any Borough in the country. It is difficult to see how this sustainability objective can be met for Cluster5 given its location.

The Plan contains many assertions of sustainability but these are generally based on arbitrary scores that have no evident rationale. Who has arrived at the scores and how? For the assertions to be credible the Plan needs to include a great deal more explanation and joined up thinking demonstrating why the proposed developments are sustainable.

Sustainability Assessment (LP/Ev/1b) - General

1. The Sustainability Appraisal **section 3.196** states that **further work** is required to determine the nature and significance of effects and the measures required to prevent, reduce and as fully as possible offset any significant adverse effects. The work still required includes the significant areas of **viability** and **education**. Without completion of this work, and the thinking behind it we feel that the Draft Local Plan cannot be effectively assessed.
2. The Sustainability Appraisal states that **Health Care** provision is being determined within the **IDP** , however the IDP states for all proposed sites:
 - *“No site-specific infrastructure requirements identified at this stage but to be considered further for the Draft Submission stage of the BFLP.”* This is the Draft Submission stage. Where are the site-specific infrastructure requirements?
 - *“Acute Care and General Hospital infrastructure **could be** provided within multi-functional community centre/hub capable of serving the site.”*

This part of the plan does not provide sufficient detail for consultation given how integral these provisions are within a community. The public should be given the opportunity to consider all health care options as part of the overall Draft Local Plan.

Infrastructure Delivery Plan (LP/Ev/4e) - General

The **NPPF** – paragraphs **173 and 177** specify that local plans should be viable and deliverable. **“Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking”**

Ministry of Housing Guidance 6 March 2014 states:

Local Plans and neighbourhood plans should be based on a clear and deliverable vision of the area. *Viability assessment should be considered* as a tool that can assist with the development of plans and plan policies. It should not compromise the quality of development but should ensure that the Local Plan vision and policies are realistic and provide high level assurance that plan policies are viable.

Greater detail may be necessary in areas of known marginal viability or where the evidence suggests that viability might be an issue – for example in relation to policies for strategic sites which require high infrastructure investment.

1. The IDP provides some estimated costing for “Additional Infrastructure Projects” in relation to transport infrastructure. However, other items are **not costed**. Also, items that have been identified as infrastructure requirements for individual sites have not been evaluated in terms of costing. Neither the revenue to be generated by CIL / S106 nor the identified costs have been estimated. **Therefore, in our view, neither the viability nor the deliverability of these projects has been demonstrated effectively.**
2. Many of the “Who / how / when” elements of the IDP include CIL and S106 as the “How” for the site specific infrastructure requirements. .However , without any estimates of costs there is **no evidence** that the LP is realistic and achievable in terms of infrastructure delivery.
3. Why have **viability assessments** not been used as a tool by BFC to assist in the development of the Draft LP?
4. **Footpaths and Cycleway** – the IDP offers the following generic comment for each site specific delivery schedule “Further improvements to the network within 3km of the site.” There is no indication as to what this could actually mean. Again, without specific proposals it is unclear how the community are supposed to assess the intention. Nothing, other than the assumption that something acceptable (a significant assumption) will be done is actually being proposed in the Draft Plan.
5. **Community Centre / Multi-functional community hub Infrastructure :**
 - 5.1. With the exception of just one site (land at Amen Corner) the IDP states for all other sites “The new development would need to be supported by an on-site in-kind multi-functional community hub or an accessible off-site multi-functional community hub”. The IDP summary for Amen corner specifies plans for Farley Wood Community Centre. However, the IDP for all other sites **fails to identify** how the onsite or offsite provision could be achieved. There are very few sites identified (Amen Corner, TRL land and land at Warfield).

5.2. The IDP offers the provision of **multifunctional community hubs** as a **solution to** various issues such as **early years provision, health care, youth centre provision, places of worship and police points**. Yet there are very few potential specific sites identified for this putative provision. This calls into question the deliverability of these proposed infrastructure requirements. Parish of Winkfield and Bracknell Town Centre have the majority of allocated housing but the sites identified for community hubs would not serve these areas. How would it all work? Or are people supposed to travel to their community hub?

6. **Water Supply** –the EA recommends that housing water efficiency standards for development be stipulated as higher than building regulation standards due to supply issues in Bracknell Forest (p38 of the IDP). This is likely to result in higher building costs to the developers and therefore create viability issues with regard to infrastructure / affordable housing delivery. There is no apparent recognition of this in the IDP or elsewhere in the LP

Infrastructure Delivery Plan (LP/Ev/4e) – Cluster 5

1. The Planning Inspector in his ruling relating to 14/01333/OUT commented on the lack of a suitable footpath between Locks Ride and North Ascot (**unlit, poorly surfaced, distance prohibitive**) and cycle options (**in practical terms limited for shopping / school trips/ evening out/unattractive and possibly perceived unsafe**).
 - 1.1.1. The IDP “Footpaths and Cycleways” is **not clear** on which section of Forest Road improvement would be made. Again, without a greater level of substantive detail, how are people supposed to make a realistic assessment of what is proposed? Nothing is proposed.
 - 1.1.2. The footpath along **Locks Ride** itself is **very narrow** with cars passing very close to pedestrians, very often in excess of the speed limit. The **IDP failed to identify** this as problematic or in need of improvement.
2. **Community Centre infrastructure**. No specific site is allocated to improve the provision of Community Centre Infrastructure even though it is identified that there will be a need. All community centres within the locality of Winkfield Row are fully utilised with very little, if any, capacity to increase usage. As the Council will know from trying to book a suitable venue for its ‘manned exhibitions’, Carnation Hall in Winkfield Row is oversubscribed in terms of availability for regular lets and has only very limited scope for ad hoc community bookings.

3. **Health care provision** - There are suggestions within the IDP that Brants Bridge and Skimped Hill could be expanded / redeveloped. However, this would **not be a satisfactory** solution for delivering Primary Health Care to many residents of Winkfield Row, particularly the old, infirm and those lacking private transport. **Travel distance** would be too great and public **transport links are poor**.

4. Many requirements have been identified for Cluster 5 but there is **no supporting evidence of viability** provided. **How has it been assessed** that this development in this location is in fact viable and deliverable?
 - Roads
 - Footpaths /Cycle ways
 - Public transport
 - New school
 - Provision for secondary education (off site)
 - Active Open Space
 - Passive Open Space
 - SANG delivery and contribution for ongoing maintenance costs
 - Biodiversity protections and mitigation measures
 - Green corridors
 - Flood management
 - Community Centre
 - 35% affordable housing

There is no evidence of a viability assessment for any of these proposals.

5. **Flood Management.** The risk of surface water and groundwater flood is identified in the Plan. This is a well-known and long standing problem in the area and could be costly to address if developing the land. This added cost could **impact viability**.



Locks Ride / Forest Road Junction 12th March 2018

No cost assessments are provided in the Plan.

6. **Government guidance** on Local Plan viability states that **greater detail** may be necessary in areas **where viability may be an issue** e.g. policies for strategic sites which require high infrastructure investment (<https://www.gov.uk/guidance/viability>) We feel this guidance is very pertinent to Cluster 5 because of its poor location in terms of sustainable development. **At a minimum BFC should undertake further viability investigations** for this site prior to making a final decision on its suitability for development.

Health Care Provision

1. According to the Bracknell Forest JSNA the **population of Bracknell Forest is expanding** at a **faster** rate than the average for England and the South East. It is therefore **not acceptable** that this draft LP contains within it only **very vague plans** for sites and delivery of additional health care provision.
 - 1.1. There is **little evidence of consultation** with National Health England / Bracknell and Ascot CCG.
 - 1.2. **No new specific sites** have been allocated to increase provision of health care for a rising population

- 1.3. The IDP (LP/Ev/4e) includes the **same generic** “Who / how/when” comment for each site evaluated. Health Care provision is a critical consideration and there **should be more information** available for this stage of the consultation. It should be an integral element of the plan.
- 1.4. The IDP states that “**more information is required** regarding existing capacity of **surgeries and funding sources**” **Surely this investigation should be carried out before housing is allocated within the LP!** The results of such investigations should also be available for scrutiny at the draft LP phase. Without this assessment how can residents can be assured that more development will not cause access to health care provision to worsen?
- 1.5. The **Parish of Winkfield** currently has **no GP provision**. The Local Plan allocates **35%** of the proposed development (1,282 homes) within the Parish and yet there is no identified new provision for health care within the parish.

Education

1. In addition to the existing school in **Winkfield Row** the Plan includes provision for **2 new primary schools in the area**, Cluster 5 and Cluster 7. It would seem **unlikely**, and there is no evidence offered, that the increased numbers of **pupils generated** from the developments would be sufficient to fill both these schools. Is it the intention that these new schools meet a general need for places in Bracknell Forest? If so, the effect will be to increase the number of car journeys into the area and therefore run contrary to the principle of sustainable development. There are **no clearly identified mitigating** measures to address this possibility.
2. The requirement for **secondary education** provision is identified within the IDP across all site assessments. However, there are **no possible sites for secondary schools identified** within the IDP. Where would the new schools go? Is there developable land available in addition to that which has been proposed for housing through the SHELAA route? **Will more land be required?** The draft LP has not addressed this point.

Highways – General Comments

There are two general points about high ways and traffic.

1. The first is that the traffic model used to simulate traffic flows is based on data collected in 2006/7 with only a ‘minimal update’ in 2013. There seems no evidence, certainly not in **CLP.Ev.4d**, that the model has been validated or ‘reality tested’ against any later actual data. Projections are envisaged for 2026 and beyond. If these are to have any credibility we believe newer, more robust data has to be collected.
2. One of the main concerns with the model output (Table 1 in CLP.Ev.4d) is that it shows potential journey times, projected on the basis of a minimal sample of journeys conducted in 2013. Only six journeys on a number of key routes, made by Council employees, were timed. We feel that this is not sufficient data to serve as an adequate indication of realistic journey times. Certainly the times we have shown to residents were regarded as totally unrealistic for peak time traffic.

Highways – Cluster 5

1. The traffic statistics on a recent planning application in the area of Winkfield Row (17/00160/OUT) stated that the 6 houses were likely to generate an additional 35 two-way trips per day (the application was for 2 x 4 bed and 4 x 3 bed so not untypical of the likely car ownership of the 500 dwellings given even a 1 or 2 bed home is likely to have similar number of cars to a 3 bed home i.e. 2). On this basis, there could be a further 2900 additional 2 way trips generated from Cluster 5, 280 from Wink15 and 1370 from Cluster 7. **Grand total of 4550**. The local roads are already congested at peak travel times and cannot cope with this additional volume.
2. Feedback given by local residents to the WRRRA following the BFC manned exhibitions demonstrated that from local knowledge of existing issues, together with the potential for this to be exacerbated by development, volume of traffic/ congestion is an area of significant concern.
3. The plans to improve cycle and foot paths are unlikely to mitigate the issue of travel congestion significantly.

4. Proposed highway enhancements for **Cluster 5** will not address the issues of congestion and safety adequately.
 - 4.1. **Road safety** is an issue – the proposal includes a spur road from the B3017 through the proposed Clu5 high density residential area to the South of Forest Road. The B3017 is a very busy “B” road, acting as a key route between M3 / M4, Windsor / Bracknell.
 - 4.2. With regard to Cluster 5 It is not clear how much space within the site has been allocated to the new road. In particular, if a wider area is required for the new road to accommodate vehicles and pedestrians safely and be sited at an appropriate distance from houses, will this impact the number of dwellings that can be accommodated on the site? Is 500 over ambitious or would the DPH be increased further?
 - 4.3. The proposed repositioned Braziers Lane/Forest Road / Locks Ride junction would result in complex movements of vehicles in an area that would be in close proximity to two schools. This is a **negative impact on health** due to road safety issues.
 - 4.4. Braziers Lane is currently deemed unsuitable for **HGV traffic**. This currently acts as a deterrent to this type of vehicle. If the proposals for the spine road proceed, this will likely result in an increase in HGV traffic through Winkfield Row and the residential areas of Cluster 5. The route is a known link between M3/M4 motorways. Note – this type of traffic next to a school and through residential areas is not appropriate.

5. **Transport Accessibility Assessment (LP/Ev/4f)**

- 5.1. Cluster 5 Assessment receives a **ranking of 2** (i.e. no congestion hotspots) for congestion in the overall assessment. This assessment, the Plan states, is based on corridor studies and local knowledge. What are corridor studies and where is the data from them? There is no mention of such studies in the one document on traffic in the evidence base (**CLP.Ev.4d**). If the evidence of a lack of congestion is so clear, why not show it?

As to so-called ‘local knowledge’; knowledge on the part of whom? Certainly no one who lives anywhere near this particular junction. As local residents living in and around the crossroads we would **strongly refute** the assessment of congestion contained in the Plan. There are significant congestion hot spots during peak travel times at the Locks Ride / Forest Road / Braziers Lane junction and also along Forest

Road, queuing back from the Hatchet Lane junction in North Ascot. These are caused by high volumes of traffic and these will only increase if Cluster 5 and Cluster 7 and Wink 15 developments proceed. The proposed junction changes are highly unlikely to mitigate the issues that are caused by the sheer amount of traffic that uses these routes. In fact, because of the increased numbers of vehicles trying to turn right across the main streams of traffic, they will almost certainly make the existing congestion worse and more dangerous, creating the 'severe impacts' the traffic modellers are so keen to avoid.

- 5.2. The congestion assessment by BFC would also appear to **conflict** with the need for Cluster 5 junction **capacity improvement requirements** identified in the IDP . Why are improvements required if BFC Traffic Accessibility Assessment has assessed the junction as having no congestion issues? It doesn't add up.

Affordable Housing

1. The plan sets an ambitious target for affordable housing within the larger sites of 35%. Current delivery within Bracknell Forest is low (statistics show affordable homes built at a level of 8% of dwellings permitted since 2013). There is **insufficient evidence** within the LP that the affordable homes can be delivered. This applies in particular to **Cluster 5** where the **sustainability** appraisal shows a **low rating** and the IDP identifies a considerable number of infrastructure improvements will be required to mitigate the negative impacts. There has been **no viability assessment** undertaken by BFC.
2. **NPPF paragraph 173 and 177** state that plans should be **viable and deliverable**. Pursuing sustainable development requires **careful attention to viability** and costs in order **to meet** requirements such as **affordable housing**. These paragraphs state that district wide development costs should be taken into account at the time the Local Plan is drawn up. It is not evident that this has been done. The IPD refers vaguely to many costs that will be paid from S106 / CIL monies. There is **no evidence** that developers will be able to deliver the affordable housing specified in addition to infrastructure requirements.

Natural Environment & SANG – Cluster 5

1. The Ecological Survey (CLP/Ev/8a Figure 4.6.4.) identifies that Cluster 5 South of Forest Road has an area of **moderate ecological constraint**. This totals an area of about **6ha** which is an unacceptable loss of natural habitat.

2. The proposed SANG has an approx. area of 11ha and a perimeter of approx. 1800m. Some of the area is in a flood zone. It is highly questionable whether it **would be attractive enough** to walkers / dog walkers to provide sufficient mitigation against the **negative impact** on the Thames Basin Heath SPA. Is it **large enough**? Are the flat and open fields **interesting enough**?
3. Would the costs of creating a SANG capable of achieving the aim of diverting residents from the SPA be such that this would further **jeopardise deliverability and viability** of Cluster 5 requirements (infrastructure and affordable homes)?
4. Natural England provide guidance relating to the must have / desirable requirements of a SANG. These include:
 - **Must have** - It should be possible to complete a **circular walk of 2.3-2.5km**. In fact Natural England state that SANGs should aim to supply a **choice of routes** of around 2.5km in length .The size of SANG proposed makes it questionable as to how an interesting circular route/s of sufficient length could be achieved. If the SANG is not sufficiently attractive to visitors it **will not achieve its purpose of protecting the SPA**.
 - **Desirable** - Where possible it is desirable to choose sites with a gently undulating topography for SANGs . The semi-wooded and undulating nature of most of the SPA sites gives them an air of relative wildness, even when there are significant numbers of visitors on site. SANGS should aim to reproduce this quality. An **undulating landscape is preferred to a flat one**. The proposed site is not undulating – it is flat fields.

Historic Environment (LP/Ev/7b)

Historic Landscape – The area North West of Cluster 5 has a historic fieldscape that is unique to the district. The creation of a **SANG** as a mitigating green space for residents to use and a new spine road are likely to have a significant **negative impact** on this historic fieldscape.

Local Plan Policies

1. Brownfield Sites

- Why is there **no Brownfield Site Policy** to support a Brownfield First /Greenfield Last approach?
- Ministry of Housing April 2017 stated that “communities will be able to highlight local derelict or underused building sites that are primed for redevelopment. This can bring investment to the area and increase the number of new homes in the area”. The Local Plan ~~needs to~~ should include a process to support this initiative.
- CPRE commissioned report (December 2017) finds that engagement with the wider public, community and/or neighbourhood planning groups in the production of Brownfield Land Registers has been limited and recommends that local authorities should explore ways in which to engage a wider range of stakeholders in the process of creating brownfield site registers.
- **A more innovative approach** should be applied by BFC and this should be **backed up in the Local Plan.**
- BFC Currently plans to review and update the register annually – applying the **minimum requirement only**. Why not more frequently?

Draft NPPF 117. Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. **Strategic plans** should contain a **clear strategy** for accommodating objectively assessed needs, in a way that makes as much use as possible of **previously developed or ‘brownfield’ land**

2. LP1 – Sustainable Development principles

- It is **not clear** from this policy **how many** of the nine principles should be met in order for development to be deemed sustainable. Is it 1 or 4 or all 9? Could a development be deemed sustainable if it just achieves one of the principles? **Greater clarity is required** to help residents understand this policy and how it is to be applied.

- **Cluster 5 site will fail** to conform to this policy on many levels. It fails to achieve the following LP1 criteria:
 - Enhance and maintain the local character
 - Protect and enhance the natural environment
 - Located so as to reduce the need for travel
 - Minimal reliance on the private car

3. LP 9 – Strategic and Local Infrastructure

- This **policy is weak** – it has too many “get out” clauses for a developer and could **conflict** with site specific policies e.g. LP6. Which policy would take precedence?
- The policy states that **only one new infrastructure improvement / enhancement** is required and even this can be avoided if a viability assessment can demonstrate that it is actually not affordable – i.e. an acceptable profit margin for the developer will not be maintained. This could conflict with sustainability principles and mean that developments are built without adequate infrastructure. If the council wish to avoid this then the **wording** of the policy **should be more robust** to prevent avoidance of delivering necessary infrastructure.
- **Cluster 5 and cluster 7** plans make provision for a school. Could infrastructure delivery stop at that? According to LP9 interpretation – the answer is yes. This is **unsatisfactory**.

4. LP12 – Landscape Character and Strategic Gaps – Cluster 5 Comments

Winkfield Row falls within a character area. Character Assessment SPD, Chapter 4 Northern Villages Study Area is relevant to Cluster 5. Areas C and D refer to Winkfield Row North (WRN) and Winkfield Row South (WRS) respectively.

Within BFC’s Draft Local Plan, clauses are included to ensure protection of character and features of landscape;

- Clause 11.2.14 of the Draft Local Plan highlights the importance of the Character Assessment “**Accordingly the Landscape Character Assessment will help inform the determination of planning applications.**”
- Contrast between ribbon development and open landscape is identified as a key feature in the Character Assessment report. The most significant characteristic of

Winkfield Row South is identified as the ribbon development on both sides of Chavey Down Road and along Locks Ride.

- Clause 11.2.1 states “The Council is committed to ensuring that the intrinsic character and valued features of this landscape are protected and enhanced whilst enabling the sustainable growth necessary for communities and the economy to thrive. The policy aims to protect and enhance the distinctive landscape character of Bracknell Forest, including the setting of settlements.”
 - The proposed development sites at Winkfield Row are contrary to BFC’s commitment to protect valued features of the landscape

- Clause 11.2.7 emphasizes that local distinctiveness should be protected. “Proposals should strengthen and enhance landscape character and local distinctiveness wherever possible”.
 - Infilling of the Winkfield Triangle between Locks Ride and Chavey Down Rd would lead to loss a of the landscape character
 - The Character Assessment recommends that “Rural gaps should be maintained.”
 - Infilling the triangle risks eroding the rural gap, the contrast between WRN and WRS and subsequent landscape/ townscape character of WRN.

- Clause 11.2.11 states “Key views within the landscape, and into and out of settlements, are not only valued by local communities but can also help define local identity and assist in way finding.”
 - Overdevelopment and infilling of Winkfield Triangle will result in loss of key long views to surrounding landscape. Character Assessment SPD recommends redevelopment should not lead to loss of connectivity / glimpses in to open fields. Long views are a particular/ identified feature of the north end of Locks Ride with glimpsed views in a western direction across grassland to mature wooded areas, and southwards from Forest Road. These long views help identify and define between WRS and the conservation area of WRN.
 - Loss of the long views from Locks Ride across the Winkfield Triangle is unacceptable since this will destroy valuable sense of separation and therefore the character of WRN conservation area

- Clause 11.2.14 states “The cumulative impact of developments is a key consideration because over time the unique landscape characteristics and strategic gaps can be eroded or harmed, both physically and through visual impacts”.
 - Cumulative impact is happening now, additional development of Cluster 5 land will further exacerbate this problem;
 - On Chavey Down Rd, Planning Consent has already been granted for infill at Meadow View (3 dwellings) and land adjacent to Neuchatel (5 x 5 bed dwellings). The former development initiates an erosion of the area’s low density character (currently 12-18dph quoted in BFC’s correspondence relating to planning application ref 17/00160/OUT Furze Bank).
 - The proposed ongoing infill over the estimated 6-year period of Winkfield triangle, with high density multiple-storey dwellings, will continue to impact

and erode character of the existing settlement with an increasingly negative effect on the open character of Chavey Down Road.

5. LP18 – Design Policy – Cluster 5 Comments

LP18 states that requirements for new development “identifies and **respects local heritage and patterns of development**” and that “All development proposals must demonstrate that they are in **general conformity** with the design principles set out in other relevant Supplementary Planning Documents including the Design, Streetscene and **Character Areas SPDs**, Design Guides and Neighbourhood Plans. “

Winkfield Row falls within a character area. Character Assessment SPD, Chapter 4 Northern Villages Study Area is relevant to Cluster 5. Areas C and D refer to Winkfield Row North (WRN) and Winkfield Row South (WRS) respectively.

- The Character Assessment recommendation states that major new development at Winkfield Row South would “risk eroding the traditional settlement pattern” and “new large developments should not negatively impact on existing street character” (Note- Osman’s Close settlement is identified as example of being more “in keeping”, Carnation Development, less so).
- Infilling of the Winkfield Triangle between Locks Ride and Chavey Down Rd. would be a departure from the traditional street pattern
- A need for new housing is not an acceptable trade-off for loss of this character feature, since the ribbon development along Locks Ride and Chavey Down Road with its traditional street pattern “**forms the most significant characteristic**” as identified in the Character Assessment SPD.

- Clause 12.1.4 states “The criteria in Design Policy LP18 seek to ensure that new development: takes account of the local context in which it sits, has regard to features of significance including heritage assets, biodiversity, landscape, views and focal points.”
 - The proposed development of 500 properties at Winkfield Row fails to take account of the local context due to:
 - Loss of separation between WRS and the conservation area at WRN
 - Loss of the ribbon development
 - Loss of long / glimpsed views
 - The proposed development is therefore contrary to many key elements of the draft local plan .

- Clause 12.1.6 states “**Development must respond positively to the site and the local context taking into consideration position, orientation, scale, height, layout, massing, detailing and use of materials.**”

- The proposed 500 new dwellings represent far higher density to the existing settlement (typically 12-18dph as quoted in council correspondence relating to planning application ref. 17/00160/OUT Furze Bank). Furthermore, the scaling is out of context with dwellings at WRS to East side of Chavey Down Rd which currently comprises of many low level/ single-storey properties.
- Overdevelopment risks the historic linear settlement pattern, going against recommendations made in the Character Assessment SPD.
- The Character Assessment recommendation states that major new development at Winkfield Row South would “risk eroding the traditional settlement pattern” and “new large developments should not negatively impact on existing street character” (Note- Osman’s Close settlement is identified as example of being more “in keeping”, Carnation Development, less so).
- The ribbon development along Locks Ride and Chavey Down Road with its traditional street pattern “**forms the most significant characteristic**” as identified in the Character Assessment SPD. The high density proposals in the south of cluster 5 do not respect this pattern of development.

Bracknell Forest Local Plan Vision (3.1)

The Local Plan vision is highly aspirational but **presumptuous**. It makes grand claims that are not sufficiently evidenced within the Draft Local Plan. These claims are **meaningless** without viability and deliverability being clearly demonstrated. There should be **greater detail** on key issues such as health and education provision and measures required to mitigate against increased traffic and sites that are sustainably poorly located.

The vision lacks credibility and will not gain the support and trust of residents if the plan is built on weak foundations.