



The Planning Inspectorate

Examination of the Bracknell Forest Local Plan

Inspectors: Louise Nurser BA (Hons) Dip UP MRTPI and David Troy BSc (Hons) MA MRTPI

Programme Officer: Ian Kemp

Email: idkemp@icloud.com

Max Baker
Assistant Director: Planning
Bracknell Forest Council

Dear Mr Baker,

Bracknell Forest Local Plan Post Hearings Letter

1. As discussed on the last day of the Stage 2 hearings, we are pleased to confirm that we are now able to move onto the next stage of the examination. We have found that the production of the Bracknell Forest Local Plan (the Plan) has met the Duty to Co-operate and is legally compliant.
2. The Plan, as submitted, is unsound but could be made sound through main modifications (MMs). To do this, we would ask the Council to prepare a schedule of MMs for formal consultation based on the MMs referred to in this letter and the accompanying appendix. This appendix also sets out any consequential amendments which would be necessary to the policies map.
3. These MMs are necessary, having taken into account the evidence which we have read and heard, together with the representations made to the Plan, our site visits to the Borough, together with the additional information which we had requested, and various Action Points (APs) which were published on the Examination website.
4. We would like to stress our appreciation of the prompt and professional manner in which the Council's officers have responded to our requests and questions throughout the examination process. As such, we consider that given the hard work which has already gone into the production of the Action Points, together with the Council's proposed MMs which accompanied the submitted plan¹, that the detailed wording of the MMs, which the Council has asked that we recommend in order that the Plan be found sound, should be relatively straightforward.

¹ LP/CORE/013

5. This letter highlights several matters. However, the detailed reasoning for all our recommended MMs will be set out in our final report to the Council. This will be provided after a period of formal consultation has taken place. The timetable for which should be agreed with us via the Programme Officer.

Spatial Strategy

6. Following discussion at the hearings, it was agreed with the Council that a revised and amended Spatial Strategy was required to provide an appropriate planning framework to make it clear where future growth and development was being directed and to provide further guidance on the approach to development in the main settlements and different areas in the Borough. To ensure the Plan is justified and effective, a modification is therefore required to provide a revised Spatial Strategy as per AP3.2 (EXAM41).

Settlement Hierarchy

7. The submitted Plan does not currently contain a clearly defined settlement hierarchy. Following discussion at the hearings, it was agreed with the Council that a new standalone Settlement Hierarchy Policy was required to identify the roles of the different settlements in the Borough and provide a clear and effective framework to guide decision making on new development proposals both within and outside the defined settlements in the Borough. A MM is therefore required to provide a new Settlement Hierarchy Policy in the Plan that should replace Policy LP2 as per AP3.2 (EXAM41), for clarity and effectiveness.

Settlement Boundaries

8. The principles used to review the settlement boundaries defined on the policies map are covered in the new Settlement Hierarchy Policy. With a few exceptions that require some changes to the policies map the boundaries are soundly based, logical and justified in defining the built limits of the settlements and the land to be included or excluded.
9. The policies map is not defined in statute as a development plan document and so we do not have the power to recommend MMs to it. However, a number of the MMs to the Plan's policies and developments require further corresponding changes to be made to the policies map. These exceptions include the areas committed for new housing development to north of Tilehurst Lane and the former office site at Beaufort Park that have now been built, as agreed by the Council in AP3.3 (EXAM22) and AP10.3 (EXAM19), respectively. In addition, the extent of the allocation of land south of Forest Road and Cheney Close should be extended to follow the field boundary.

10. The other exception is the park homes development at Warfield Park on the northern eastern edge of Bracknell. The large expanse of residential park homes and community facilities provides suburban residential character and appearance to the Warfield Park area that forms a natural extension to the adjoining residential area. The settlement boundary should therefore be extended around the existing park home development and the land covered by the extant and implemented planning permission for up to 82 mobile homes (15/00383/FUL) for effectiveness.

Housing

11. As the Council has already accepted within the proposed MMs which accompanied the submitted plan, the housing requirement for the plan period as expressed in Policy LP3 is ambiguous and is not consistent with the Framework. Clarification is required to differentiate the housing requirement for the Borough predicated on a quantum of development which has been based on the standard methodology and the provision of an additional supply of housing to allow for flexibility. This approach results in annual requirement of 614 dwellings per annum which is for a minimum of 10,438 dwellings to be provided over the plan period. This will require several consequential MMs throughout the Plan.

Employment

12. Proportionate and up-to-date evidence indicates a need for a total of 19,125 sqm of additional office floorspace and 48,875 sqm of additional industrial and warehouse floorspace in Bracknell². However, the evidence clearly shows that, whilst there are opportunities for additional office floorspace in and close to Bracknell town centre to meet the needs for offices, the amount of land in the Borough suitable and available for new industrial and warehouse development is extremely limited.

13. The updated Table 12 in Policy LP11 (EXAM35) shows the proposed employment/mixed use allocations in the Plan would provide 25,960 sqm of additional office floorspace between 2021 and 2037 that would be more than required in the Borough (19,125 sqm). However, the latest employment floorspace monitoring in October 2022 (LP/Ev/30) shows that the levels of need have increased in recent years due to losses of office floorspace to alternative uses and as such the level of additional provision is currently less than required in the Borough.

14. In relation to industrial and warehouse development, a total of 12,325 sqm of additional industrial and warehouse floorspace has been provided on

² Employment Land Need Study 2020 (LP/Ev/3E) and BFC Economic Background Paper 2021 (LP/SP/003)

51. In preparing the schedule of proposed MMs for consultation, the Council should liaise with us, via the Programme Officer, to refine the detailed wording. Once we are happy with the wording, the potential MMs will then be the subject of formal public consultation. We have attached as an appendix an example of how we would like the MMs to be presented.
52. The Policies Map is a geographic illustration of where the various policies in the BFLP apply, and certain amendments are necessary to it for the geographic application of the policies to be justified and effective. Where the Policies Map needs to be amended from that submitted with the BFLP, the changes should be published in a schedule alongside the MMs and also form part of the consultation. These changes include deleted or added sites and amended boundaries and are listed in the appendix.
53. To avoid any doubt, we are not inviting comments about the contents of this letter. There will be the opportunity, at the formal consultation stage, for those who wish to make representations on the proposed MMs.
54. We will take into account the responses to the consultation, before reaching our final conclusions, on the MMs required, in order that we can find the Plan sound. However, the general expectation is that issues raised, following the consultation of the draft MMs, will be considered through the written representations process. Further hearing sessions will only be scheduled exceptionally.
55. Please consider whether any of the MMs will need to be subject to Sustainability Appraisal or whether the Habitats Regulations Assessment may need to be updated or an addendum produced to take them into account. If so, these documents should be published alongside the MMs, in due course, for the assistance of consultees.
56. A copy of this letter should be placed on the examination website.

Yours sincerely,

Louise Nurser and David Troy

Inspectors

19 January 2023

APPENDIX 1– OUTLINE OF MAIN MODIFICATIONS REQUIRED (IN PLAN ORDER)

To ensure the plan is sound, the following Main Modifications (MM) are required. Numbers in brackets refer to the Proposed MM numbers in LP/CORE/013, the Council’s suggested schedule of changes to the plan. The proposed MMs arising from the Action Points (APs) from the Stage 1 (EXAM7) and Stage 2 hearings (EXAM46) are also referred to. Some editing and amendments will be required to these prior to formal consultation.

For the avoidance of doubt, all references to paragraph numbers relate to the plan as submitted.

Part 1 – Strategic Issues

MMX: Vision

As per (MM1-MM3).

MMX: Plan Objectives

As per (MM4-MM5).

MMX: Spatial Strategy

Insert new explanatory text to replace paras. 5.6-5.30 and new Spatial Strategy as per AP3.2 (EXAM41) to provide clearer guidance on the approach to development in the main settlements and different areas in the Borough.

This will require amendments to ensure it is consistent with the allocations which are recommended to be deleted, including the Garden Village at Jealott’s Hill.

MMX: Sustainable Development Principles (Policy LP1)

As per (MM6-MM7).

MMX: Sustainable Locational Principles (Policy LP2)

Delete Policy LP2 and explanatory text paras. 6.8-6.13.

MMX: Settlement Hierarchy (New Policy)

Insert new standalone Settlement Hierarchy Policy and explanatory text as per AP3.2 (EXAM41) to provide a clear and more effective settlement hierarchy to guide development proposals in the Borough.

This will require amendments to ensure it is consistent with the allocations which are recommended to be deleted, including the Garden Village at Jealott’s Hill.

Change settlement boundary at Warfield Park to include existing park home development and land covered by extant and implemented planning permission for up to 82 mobile homes (15/00383/FUL) as referred to in AP19.3 (EXAM56)

Change settlement boundary to include areas committed for new housing development to north of Tilehurst Lane and the former office site at Beaufort Park as referred to in AP3.3 (EXAM22) and 10.3 (EXAM19).

MMX: Strategic Policies

As per paragraph 21 of the Framework, the following policies should be defined as strategic (See AP1.4) (EXAM40), including new standalone strategic policy on Climate Change as AP1.5 (EXAM59)

MMX: Provision of Housing (Policy LP3)

Amend as per Council's MM8. However, delete last sentence beginning, 'Whilst...'

Amend as per (MM9-MM13 & MM16).

Update para 7.16 to exclude first two years of windfall.

Tables 5 & 6 and para 7.18. Amend to reflect up to date trajectory as set out in EXAM33. However, do not alter windfall assumption. Amend outstanding need to 1738 dwellings.

Amend 7.25 to refer to annual requirement of 614 dpa.

MMX: Self build and custom build (7.10)

Delete 'up to' from paragraph 7.238.

MMX: Sites allocated for Residential/Mixed Use Development (Policy LP4)

Amend Tables 7 and 8 to refer to approximate dwelling capacity and approximate affordable housing capacity at 35%. Make consequential amendments to individual site allocation policies. Include reference to parish in each address.

Round site capacity up or down to nearest 10.

Amend Table 9 as per wording in Exam 28 but amend first line to include, 'As no reliance is being placed on any additional sites over and above those allocated....'

Amend Tables 7 and 8 in Policy LP4 to cover revised Eastern Gateway Development Area (BRA7) and Southern Gateway Development Area (BRA14, BRA15 and BRA17) as per EXAM26 and EXAM27.