

Suggested Answers to the BFBC's 3 SADPD Modifications.

Navigating the BFBC Planning Portal

<http://www.bracknell-forest.gov.uk/siteallocationsdevelopmentplandocument>

From the above link, we have 4 options – if you are familiar with the SADPD debate then at present only two are relevant.

a) Proposed Modifications:

<http://www.bracknell-forest.gov.uk/siteallocationsdpdproposedmodifications>

Gives background information on the latest stage of the process and you can follow the links to get to the response pages

b) Library of Documents:

<http://www.bracknell-forest.gov.uk/siteallocationsdevelopmentplandocumentlibrary>

Scroll down to the bottom to find 3 relevant documents:

BFBC/14	Schedule of Proposed Modifications to the Draft Submission Document	January 2013
SAL118	Summary of SADPD Proposed Modifications	February 2013
SAL122	Proposed Modifications Response Form	February 2013

The 3 modifications being addressed by BFBC are

1. The inclusion of a policy on the **presumption in favour of sustainable development** to reflect the National Planning Policy Framework (NPPF);
2. The **addition of settlement boundaries for the major urban extensions** to give greater certainty on the location of development and better demonstrate compliance with Core Strategy Policy CS9 (to include the insertion of illustrative concept plans for land at Amen Corner South and land at Warfield based on those in their respective adopted Supplementary Planning Documents (SPDs));
3. Changes to the wording of the plan and the approach to housing supply to achieve general conformity with the South East Plan (SEP); particularly its housing requirement. These **changes include the addition of a number of new sites to provide a more robust housing land supply**

Document [SAL118](#) identifies which clauses in document [BFBC/14](#) which relate to the above 3 questions.

[SAL122](#) is the response form, which the public (**YOU**) are asked to provide feedback.

You may wish to respond directly to the various revisions by registering (or signing on) to [the BFBC Planning Portal](#) and completing the online form appropriate to the [SADPD Proposed Modifications](#)

We think a simpler alternative is to complete one or more copies of the SAL122 response form. A separate response to each of the above 3 questions is recommended

For each response, it is important to follow the guidelines at the top of SAL122.

Suggested responses are in **blue font** below but of course it would be good if you adapted those responses using your own words. Text in **red font** gives advice and guidance in completing the form.

Page 1:

- Remember to give personal details: Name, address, e-mail address and telephone number
- You are representing yourself so enter: **For myself**

Page 4:

You are invited to give a reference to which your comments relate – SAL118 has those references.

For Modification 1: CM7 and CM8 are relevant

For Modification 2: Any or all of the following could be relevant **CM26, CM31, CM35, CM39, CM42, CM44, CM46, CM51, CM63, CM75, CM78, CM190-CM195 Appendices D & E of BFBC/14**

For Modification 3: The reference numbers for the sites are

Proposed new sites	
Binfield Nursery	CM21, CM74, CM143 and Appendix B of BFBC/14
Land at Wood Lane	CM23, CM72, CM185 and Appendices C & E of BFBC/14
Previously identified sites	
Land at Blue Mountain	CM35, CM36, CM37, CM38, CM39, CM63, CM189, CM194 and Appendices D & E of BFBC/14
Land east of Murrell Hill Lane/South of Foxley Lane	CM165-CM169
Land at junction of Forest Road & Foxley Lane	CM170-CM173
Land at Amen Corner North	CM32, CM33, CM34, CM63, CM188, CM193 and Appendices D & E of BFBC/14
Land at Amen Corner South	CM40, CM41, CM42, CM43, CM44, CM63, CM193 and Appendices D & E of BFBC/14

For all three responses to the three Modifications it is reasonable to answer questions 1 and 2 as follows

Question 1. This modification is not legally compliant.

You could expand by noting also - The question of legality and non-legality excludes the general public from making appropriate comments in public consultation

through lack of knowledge of procedure and detail of Acts of Parliament. My response here is in order to ensure that my comments are noted and not ignored

Question 2. It is unsound.

Question 2a. Not effective and Not justified

Page 5:

Here we provided evidence at Question 3 to justify our responses to questions 1 and 2. That evidence is of course different for each of the three modifications, hence the need for 3 responses.

Question 3 -Suggested response for Modification 1 - *The inclusion of a policy on the presumption in favour of sustainable development to reflect the National Planning Policy Framework*

The sustainability of development is continually being used in the Bracknell Forest Local Plan i.e. the Core Strategy. Using diverse vocabulary to create a presumption in favour of sustainable development to reflect the National Planning Policy Framework has no value to Bracknell Forest in general and to Binfield in particular. It does not actually take into account local needs. It cannot contribute to the sustainability of the community if it erodes the quality of the environment, is unable to contribute to the economic prosperity of the community because the financial services seem unable to move forward and the evidence used to justify the site allocations chosen so far is at best old and at worst wrong

As a member of the public with no legal background I am prepared to say the NPPF is not required to be included in the BFC LDF Core Strategy. It may be a very legal document but it does not make a contribution to the quality of my life in Bracknell Forest. In fact it is a very aggressive document which will not support a sustainable community that will enhance my life style but is biased towards developers' acquisitive, so called entrepreneurial, lifestyle. A national planning policy should seek to protect and enhance environmental and heritage assets in a manner appropriate to their significance and where practical and consistent with other objectives, ' allocation for land for development should be towards land of lesser environmental value

The NPPF urges development to proceed because housing appears to be required and nothing should get in the way of the completion of a development. Countryside, gaps between the built environment and any available green space even that which was once regarded as of public value is readily made available for development by policies in the NPPF

The NPPF could be available online and local authorities could make it easily available through efficient Internet links and by providing documents such as the NPPF in hard copy, in public libraries.

Modifications such as this one achieve little in this time of a public examination especially for residents threatened with the erosion of those things which contribute to the quality of their daily life : putting sustainability policies into the Core Strategy / Local Plan smacks of anxiety that perhaps the Core Strategy is a strong legal document and even the NPPF cannot support the developers as thoroughly as was thought possible.

Inclusion of this Modification is not justified. It should not be included in local plans such as BFC LDF Core Strategy and just serves to make this part of the local plan, the SADPD, un-sound.

Question 3- Suggested response for Modification 2 - the addition of settlement boundaries for the major urban extensions to give greater certainty on the location of development and better demonstrate compliance with Core Strategy Policy CS9

Planning should be a collective enterprise. However planning has tended to exclude, rather than to include, people and communities. In part, this has been a result of targets being imposed, and decisions taken, by bodies remote from them. The language used in this response document can isolate the general public so that it cannot take part appropriately in public consultation

Planning for the development of the Blue Mountain site (SA7) relies on the destruction of a publicly available golf course and the loss of approximately 15 ha of open green space in itself keeping separate the old Village of Binfield from the urban town of Bracknell. In the modified documents produced to justify the Modifications proposed, it is stated that the developed Blue Mountain Site will create a buffer between the community of Binfield Village and Bracknell Town Centre. There is a more than adequate buffer in the green space previously marked as Green Space of Public Value. This marking was removed from the Bracknell Forest Proposals Map without public consultation. The removal was confirmed by a Council vote on the 30th November, 2011 when the whip was used, undercover of a stormy Full Council Meeting which produced questionably legal results over the submission of the final Draft of the SADPD to the Secretary of State.

Additions of settlement boundaries as modifications are unjustified and ineffective particularly before there is a final response from the Inspector to the SADPD. It does not contribute to the soundness of the BFBC LDF CS SADPD

It should be recognised that some open land can perform many functions such as for wildlife, informal recreation such as walking, flood risk mitigation, carbon storage, or even food production.

None of the four principal sites included in the SADPD are within safe walking or reasonable safe cycling distance of any social amenities – shops, cinemas, churches, pubs etc. The addition of settlement boundaries round SA 7 will not

bring these amenities closer.

Local Plans (section 25) are the key to delivering development that reflects the vision and aspiration of local communities. To do this, 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 development of the area, including adopted neighbourhood plans.

However, the current economic climate does not support the 10780 houses based on the 2006 figures used to develop plans for the original and subsequent SADPDs. Also, the indications are that Bracknell, while considered to be a fairly wealthy area (see SADPD Appendix P – Bracknell Forest housing market assessment – DTZ report) has a significant population with wages well below that necessary to obtain a mortgage. BFBC has several programmes in place to help the lower paid buy their houses. However, the economics are such that they can support only a very small number of those in need. There is only a limited amount of financial support available to provide attractive incentives for developers to build low-profit-margin affordable homes. The DTZ report – updated 2011 suggests that 72% of newly formed homes in the Borough do not have enough household income to support a mortgage, even for homes in the lower quartile price bracket.

The addition of a settlement boundary to SA7 and maybe even to other major urban extensions cannot change this information, which is constantly brought up in argument as evidence against the SADPD and still stands (19. 03. 2013)

This modification is ineffective and unjustified and contributes to the unsoundness of the proposal

Question 3 - Suggested response for Modification 3 - the *inclusion of a number of additional sites to provide a more robust housing land supply*

It is understood that the South East Plan is to be withdrawn on March 25th, 2013 and that must mean that the BFC can return to their suggested method of increasing the housing supply, both in the Core Strategy and in the DSSADPD, by awaiting the constant but gradual emerging of land available for development e.g. wind-falls, change of use of industrial land etc.

Having been directed during the Hearings that the S.E. Plan could not be ignored, BFC has had to admit that a source of land available for housing development is in the un-used offices in Bracknell Town Centre. It is hoped that they, BFC, can stand firm on this method of site allocation i.e. re-cycling office space.

This proposed modification is unjustified and ineffective and its contribution to the SADPD is unsound.

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Please respond as you see fit to questions 4 - 9

Question 4

BVPS does not think members of the public should do the work for the BFBC by answering this question. It is of course a personal submission and if you have opinions and comments you wish to voice please do so.

Question 5 - 6

This requires a personal, individual answer.

Question 7 **YES.**

Question 8 - 9 **BVPS may be addressing this question on my behalf**

THANK YOU FOR GETTING THIS FAR – PLEASE CHECK your name , address, telephone number and e-mail is correctly included on the first page just to validate your response.