

Response from Binfield Village Protection Society. 12th March 2012.

To

**Bracknell Forest Council
Draft Submission Site Allocations Development Plan Document.**

The Bracknell Forest Council Local Development Framework Core Strategy Draft Submission Site Allocations Development Plan Document will be referred to as the DSSADPD throughout any and all submissions made by Binfield Village Protection Society in response to the Bracknell Forest Development Plan Document. Other acronyms will be used when appropriate and obvious, for example - BFC, LDF, CS, BVPS, NAAG.

If the accompanying letter has been included with all the submissions I have prepared on behalf of the BVPS and forwarded to the Inspectorate, it will be apparent that I, and many of the members of BVPS, found that the number of documents (63) were difficult to address, that the DSSADPD was challenging to answer, the process was demanding and frustrating and the recording of the submissions online almost the straw that broke the camel's back. A wiser man than I said of the planning consultation process that
“ Its like walking through treacle “

The planners of the local authority, BFC, ably backed by the Planning and Transport representative from the elected members, who sits on BFC Executive say that “We .. “ need the Core Strategy and the Site Allocations to control the developers. Without the legal status of the Core Strategy the developers will build anywhere. This is contrary to the most up-to-date information (12.03,2012) put out about the emerging NPPF which says that changes are needed, developers can build on green fields because it is cheaper for them to prepare and they are very important to get the economy going again. This conflict between local planning policies and national expectations is unsound and perverse.

Binfield Village Protection Society has always been concerned to protect the remnants of the rural aspects of the village from the development pressures of the day and the Gaps that still remain from the planning legislation of another era. Rural means small swathes of countryside that border the settlement and Gaps are meant to stop the coalescence of settlements and may be big or small.

Gregg Clarke: from an early Introduction to the NFFP. “The purpose of planning is to help achieve sustainable development. *Sustainable* means ensuring that better lives for ourselves doesn't mean worse lives for future generations. “ “Sustainable development is about change for the better, and not only in our built environment “

As Chair of the BVPS have approached each submission positively. It is hoped that clarity has been achieved and that the Inspector will consider all the submissions favourably.

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SUBMISSION:

In taking part in the DSSADPD public consultation BVPS concerned that some and some parts of the Objectives and sub-objectives have not been met or are in conflict with, already established policies, for example in the BFC Core Strategy.

1.3 Objectives and sub-objectives

1.3.1 The SADPD will help deliver the vision and objectives of the Core Strategy. In view of the role of the SADPD in allocating sites for future development needs, it is considered appropriate to expand on the aims of particular Core Strategy objectives by adding further detailed sub-objectives concerned with the delivery of housing, provision of infrastructure and impact on the Strategic Road Network. The Core Strategy objectives and related additional sub objectives are as follows.

- A. To plan for a balance of housing and employment growth.
- A (i). *To ensure an adequate supply of land to deliver the community's needs based on the Core Strategy housing target.*
- E To promote a transport system which enables access to services, by a choice of transport modes.
- E (1) *To mitigate against the impacts of development on the operation of the Strategic Road Network (with particular emphasis on Junction 10 of the M4 and Junction 3 of the M3) and on local roads.*
- G To support and facilitate essential community facilities and infrastructure in accessible locations.
- G (1) *To co-ordinate new developments with the provision of infrastructure so that it is available at appropriate points in the development process. This should be based on the preparation of an Infrastructure Delivery Plan.*

In considering how future development needs can be met, it is inevitable that there will be conflicts in trying to meet these and other Core Strategy objectives. As a result, it must be accepted **that trade-offs between objectives will have to occur.** The Core Strategy objectives and the SADPD sub-objectives provide a framework within which alternative options have been assessed, adverse impacts identified and, as far as possible, mitigated against.

It is in the opinion of BVPS that the DSSADPD is such an important document that will determine the conditions and way of life of the majority of the population of Bracknell Forest from today until 2032 and beyond, that should any part of it be shown to be unsound it should not be included in the final document.

SUBMISSION continued

A. To plan for a balance of housing and employment growth.

A (i). *To ensure an adequate supply of land to deliver the community's needs based on the Core Strategy housing target.*

BFC will not be able to achieve Objective A because the sub-objective A(1) is based on out of date figures and poorly used data. Stuart Bell's paper is included below as evidence of this statement. BVPS feel that the results and conclusions of this paper underline all the submissions which question the soundness of policies in the DSSADPD and will be included when ever evidence is needed for the submission being addressed at the time.

HOUSING

Evidence:

Analysis of CLG/ONS Housing Projections for Bracknell

Stuart Bell 14/02/12

Reference Data Source

1. Table 406: Household projections¹ by district, England, 1991- 2033:
Last Updated Nov 2010
<http://www.communities.gov.uk/documents/housing/xls/140987.xls>
2. Table 125: Dwelling stock estimates by local authority district: 2001 – 2011 *Last updated Nov 2011*
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Table 406 is the basis for the housing need figures. Some care is needed in assessing the data publicly available because it is given to the nearest 1000 dwellings. For Bracknell, (2026 projection – 2006 actual) =(57K-45K)=12K dwellings, which is presumably the supporting evidence for the current BFBC SADPD housing requirement.

Table 125 published in Nov 2011 contains details of the housing stock for each local authority from 2001 to date. This data is much more robust than anything available when the original projections were prepared. BFBC Planning Dept were presumably well aware of this data before it was collated by Central Government and it seems amazing that it has not been used to

check the original centrally imposed requirement, particularly once it was clear that those figures were not being imposed.

Figure 1 gives the year on year % annual change in housing for the historic/projected period from 1998 to 2026 extracted from CLG Table 406 (referenced above). Data for South East and for Bracknell Forest are included (a 5 point smoother has been applied to the Bracknell data because the baseline housing data is only to the nearest 1000 units)

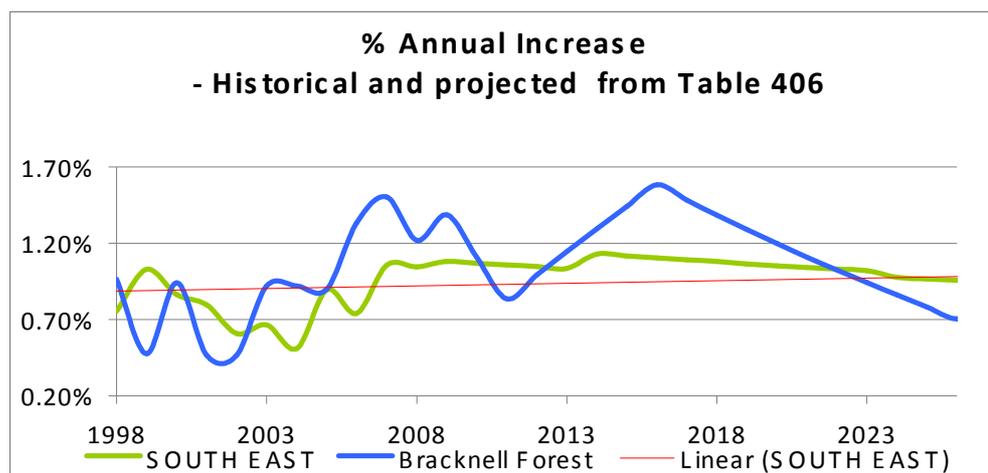


Figure 1

We accept that a detailed demographic analysis has been made at a regional scale to support the extrapolations, although note that these are only estimates, have not taken into account migration trends and even the short-term projections 2008-12 have been proven inaccurate. The trendline for the South East (in red) assumes a modest rise in the % year on year increase (to 1%) over the period, which seems reasonable given the aging population trend

At local authority scale (e.g. Bracknell), the plot (blue line) is much noisier. One suspects that given the number of LAs in the UK, the level of detailed scrutiny has been small. What evidence for expecting a 1.5% year on year increases in housing stock by 2015? Is there any evidence for expecting the increased need for housing in Bracknell to exceed the rate for the South East?

Figure 2 expands on Figure 1 for the period 2002-11 and also includes (pecked lines) the new data on actual housing stock from CLG Table 125 published in Nov 2011. For the South East, the data is similar but not identical for the period 2002-08 when both sets of data are actual builds and diverge from 2008 as the recession results in actual builds below expectation. For Bracknell, there is a clear discrepancy between the historic data used to make the projections and the latest data. The difference for 2005-2007 is particularly stark. This is clear evidence that the projections are based on invalid data and cannot be trusted.

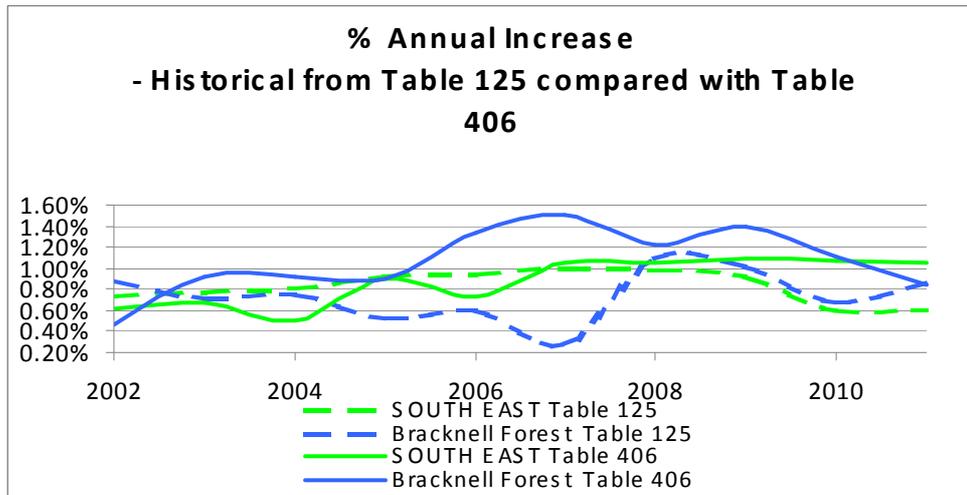


Figure 2

The same information is provided in tabular form in Table 1. This highlights the size of the error in the original historic data which gives rise to the inaccurate projections. The assumption had been that Bracknell has been growing at a faster rate than the SE when in fact the reverse is the case.

	2001 Total (1000s)	2008 Total (1000s)	% increase over period 2001-2008	Average % increase per year
Table 406				
SOUTH EAST	3,294	3,480	5.6%	0.79%
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Table 125	Average % increase per year (2001-11)
ENGLAND	0.73%
SOUTH EAST	0.83%
Reading	1.12%
Kent	0.99%
Oxfordshire	0.91%
Hampshire	0.88%
Wokingham	0.74%
Buckinghamshire	0.74%
Bracknell Forest	0.74%
West Sussex	0.69%
Surrey	0.67%
East Sussex	0.61%
Windsor and Maidenhead	0.60%

Table 2

So with all the above evidence, why have the growth projections (Table 3) for Bracknell been defined to be higher than the South East as a whole?

	2008 Total (1000s)	2026 Total (1000s)	% increase over period 2008-2026	Average % increase per year
Table 406				
SOUTH EAST	3,480	4,200	20.7%	1.05%
Bracknell Forest	47	57.2	21.7%	1.10%

Table 3

One might argue that with changes in the Government position on inward migration and the improved financial position of Eastern Europe now compared with 10 years ago the 1.05% projected annual increase for the South East might be excessive. However that is pure speculation. What is much less speculative is that the demand in Bracknell will be relatively weaker than the South East generally. That is the evidence of the last decade and there is no evidence to suggest that Bracknell will be a more desirable place to live in the future (awful town centre, no demand for Office space, traffic etc)

Figure 3 gives several speculative annual growth rates for Bracknell housing stock compared with the current projection.

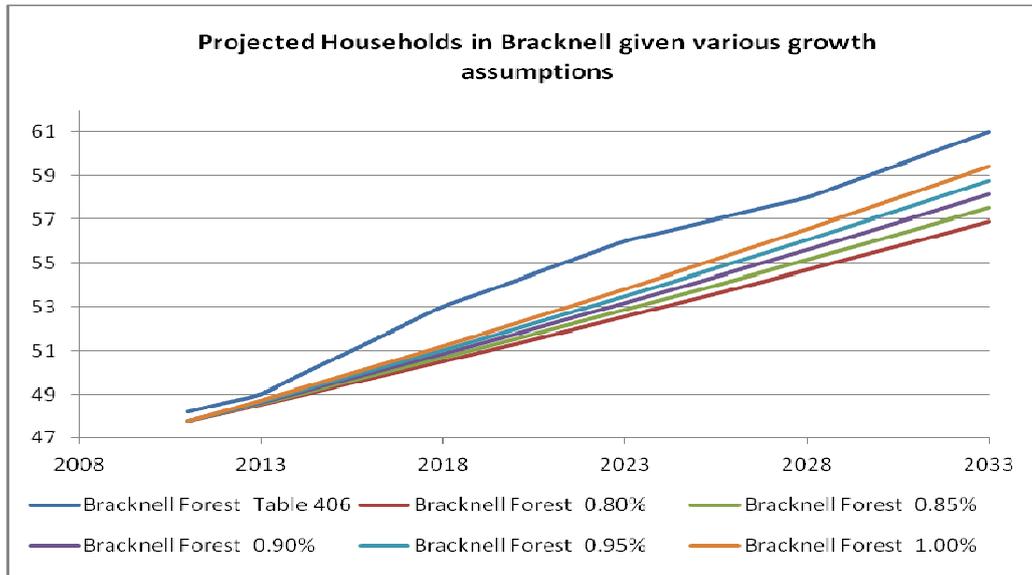


Figure 3

I would argue that 0.85% per year increase is most likely scenario. This is 0.1% above the growth rate for Bracknell over the past decade in line with the demographic trends assumed by ONS/CLG studies but a shade below the expected growth rate for the South East as has been the case for the past the past decade. Table 4 compares the current projection with a 0.85% growth rate, starting from the actual 2011 number of dwellings. This evidence suggests that the current 2026 target for housing in Bracknell is 3000 in excess of likely requirement.

	2011	2013	2015	2017	2019	2021	2023	2025	2026
Projections in Table 406	48.2	49.0	50.6	52.2	53.6	54.8	56.0	56.8	57.2
Projections assuming 0.85% annual increase	47.8	48.6	49.4	50.2	51.1	52.0	52.9	53.8	54.2

Table 4

BVPS consider Mr Bell’s evidence as accurate and include it in our submission (s) that the BFC housing policy is based on out of date and to some degree, inaccurate figures collected and used inappropriately at this time. (March 2012)

With these figures that

. This evidence suggests that the current 2026 target for housing in Bracknell is 3000 in excess of likely requirement.

SUBMISSION:

BVPS submit there is in reality a sufficient land supply available over the next five years to meet Government requirements of 20% because of BFC's excessive projected numbers for housing in the Borough.

SUBMISSION:

BVPS submit the same arguments over the "need" for housing. Expectations of requirements of housing of different types, including affordable and social (occupation by the elderly) housing are excessive. If BFC persist with this data all the policies proposed in the DSSADPD, not just the few in Binfield of which BVPS is particularly concerned, will be based on evidence that makes them *unsound*.

DTZ (October 2011) Bracknell Forest Housing Market Assessment

This report by DTZ was commissioned by Bracknell Forest Council warns, in their Executive Summary, that the forecast may be overstated :

"DTZ expect that household projections, based on 2008 populations estimates, may over-estimate household formation because they do not take account of the fundamentally different economic environment post 2008 "

et altera: Dixon Searle (November 2011) Draft Bracknell Forest Council Strategic and Small sites : Viability Study.

DEFRA (2006) Local Sites, Guidance on their Identification and Management

SUBMISSION:

EMPLOYMENT

BVPS understands why Bracknell Forest Council keep Housing and Employment in the same objective. Sufficient and good quality housing must be available to attract employees to those companies who wish to function in Bracknell. All housing in Bracknell is perceived as expensive and apparently renting in Bracknell requires an annual income of atleast around £40, 000 +. Most people in Bracknell with a job with a high salary will be able to find accommodation. Young people who are in work will not be earning sufficient monies to get themselves easily on the housing ladder at this point in time. This a situation that began in 2008 with the financial crunch which affected Bracknell just the same as the rest of the country (the UK) and is still with us. Hopefully financial conditions will improve soon, certainly by 2026 but economic conditions in the UK in 2012 are very uncertain. It does not need "evidence" for anyone, least of all for

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BVPS, to prove that this is so. Improved employment (and unemployment) and increased house purchasing is not a forgone conclusion.

Entrepreneurs are not going to undertake house building before they are confident of house sales.

Under present economic conditions Bracknell Forest Borough Council should not be committing swathes of greenfield sites to unsellable house building. BVPS will challenge some of the policies in the DSSADPD on out-of-date data on house building and the obvious effects on house building and house sales of the present serious economic down turn.

SUBMISSION:

Employment and the state of the economy is related to and seriously affects Retail

4 Retail

4.1 Bracknell Town Centre

4.1.1 The Retail Study (48) shows that on the whole Bracknell is not performing as well as rival centres. It is important that Bracknell Forest has a main town centre that meets the needs of its residents and reduces their propensity to travel to more distant centres.

Outline planning permission has been granted for the regeneration of Bracknell Town Centre, which, amongst other uses, includes a supermarket, a mix of retail, hot food and drink establishments, health facility and residential development.

4.1.2 Bracknell Regeneration Partnership owns a considerable amount of the land within the Town Centre and is working with the Council to bring the scheme forward. The regeneration proposals are designed to improve access to the Town Centre from surrounding areas and encourage residential development in sustainable town centre locations.

SUBMISSION

**Section: Sustainable Development Principles CS 2
Location Principles CS 3**

**Policies: SA 11, Bracknell Town Centre
The Peel Centre**

Bracknell Town Centre , in the DSSADPD SA 11, is legally compliant with BFC Core Strategy CS2, CS3

The Peel Centre, in the DSSADPD is legally compliant with CS2 and CS3

BVPS consider Policy SA 11, i.d. Bracknell Town Centre AND The Peel Centre is sound and should be kept in the DSSADPD

Policy SA 11 is consistent with national policies in most respects However –

Policy SA 11 Bracknell Town Centre would be considerably more effective if more “regeneration” was quickly and positively implemented. BVPS feels that the regeneration of the BTC should not be held up by the failure of some Policies in the DSSADPD on being found to be **unsound. If the regeneration of the Town Centre moved on and included all kinds of housing, a variety of urban designs (e.g such as the original design of Point Royal in Easthampstead Parish, Listed Building of 20th Century Architecture.) should be considered**

BVPS have often discussed an improved Town Centre. Paragraph 4.1.1 above details outline planning permission to provide retail similar to BVPS suggested outcomes i.e. provision of very small “corner shops “, and other food outlets such as coffee shops, bakeries, sandwich counters, tea bars and wine bars with limited opening, pharmacies, accessories, stationary and IT commodities, These should be part of the housing provision and contribute to the design and style of the urban setting.

Policy SA11 The Peel Centre, like BTC, is justified and appears to be effective. Changes in Retail Outlets, TESCO, Next and Morrisons, appear to be flourishing. The older ware-house outlets, e.g, furnishing, shoes, seem to survive in the floundering economy.

Policy SA11 needs all the principles of Sustainable Development applied, maintained and monitored to make the regeneration of BTC effective and justifiable and to continue the viability of The Peel Centre

Efforts should continue to be made, in order to improve the Town Centre ‘s viability, by re-assessing and monitoring transport links. Bracknell has a poor record of good public transport links. Communities outside Bracknell Town Centre have relied on a car. Extensions and adaptations to connect the BTC and The Peel Centre should be considered

Policy SA 11

Bracknell Town Centre

Land in Bracknell Town Centre as shown on the Proposals Map(49) is identified for a mixed use development including retail, business, residential, leisure and other ancillary development.

Any proposals must accord with the principles, development zones and schedules set out in the adopted masterplan, or any subsequently agreed amendments, framework and strategies. Any proposals must contain measures to mitigate the impact of the development.

The Peel Centre

4.1.3 The Peel Centre is a retail warehouse development located to the south west of the Town Centre primary shopping area. It is less than a 300 metre walk from the primary shopping area retail core of Bracknell Town Centre. There is scope to improve the quality of the pedestrian links between the Peel Centre and Bracknell Town Centre through the wider regeneration proposals.

4.1.4 Under the definitions in PPS4(50), the Peel Centre meets the definition of an edge-of-centre location. Therefore the Peel Centre is designated as an edge-of-centre location suitable for retail warehouse development.

BVPS considers the commitment of Bracknell Forest Council to the regeneration of Bracknell Town Centre and its connection with The Peel Centre needs consistently reinforcing, engaging and enhancing.

Excessive Office Space

Acknowledging excessive office space is a realistic start to a more affective attitude towards really improving the BTC. BFC LDF Core Strategy CS21 Town Centre and CS22 Out of Town Centre

Efforts should continue to be made to use by rebuilding or modernising to 21st Century standards and expectations, or by eliminating, the excessive office space. Land belonging to Legal and General is beginning, in a very small way to be refurbished into housing units (flats) on first and second floor redundant offices with retail units on the Ground floor.

There are several documents available that highlight the problems of Bracknell Town Centre. Bracknell Forest needs to address them if they are to make more than a little progress with the improvement of Bracknell Town Centre.

Source:

DCLG (December 2009) PPS 4 Planning for Sustainable Economic Growth

GVA Grimley (May 2008) Bracknell Forest Retail Study

Hicks Baker (October 2011) Market Prospective of Bracknell Forest Borough Office Floor Space

Roger Tym & Partners / Vail Williams (December 2009) Employment Land Review.

Urban Initiatives (October 2010) Bracknell Forest Masterplanning Support

SUBMISSION: With more input in every respect from the Council, Bracknell Town Centre and The Peel Centre would improve in appearance and function which would benefit the community as a whole. Mixed development of retail, commercial, residential and leisure all in the same area plan would be beneficial to the whole Borough

SA 11 Sound.

2.2 Sites in defined settlements

Sites in defined settlements

2.2.1 Two type of sites within existing settlements are included in the Core Strategy locational Policy CS2. They are previously developed land within defined settlements, and other land within defined settlements.

2.2.2 Priority is given to the first type mentioned above, in terms of the sequence of search.

Previously developed land and buildings in defined settlements Other land within defined settlements

SUBMISSION:

BVPS considers

Policy SA 1 Previously Developed Land in Defined Settlements **and**

Policy SA 2 Other land within defined settlements **to be legal**

BVPS consider the following sites to be legal, within local and national policies, including some emerging policies in the proposed NPPF .

BVPS considers the Policies to be effective and justified

BVPS consider the Policies to be sound and should be included in the DSSADPD.

Sites include

Garth Hill School :	Previously Developed Land in Defined Settlements
Farley Hall, London Rd., Binfield	“
Albert Rd. Car Park	“
Land North of Eastern Rd.	“
Old Bracknell Lane West	“
Bracknell Football Ground	Other Land within Defined Settlements
Land at Cain Rd., Binfield	“
Popeswood Garage, and two houses , London Rd., Binfield.	“
Land North of Peacock Lane, Binfield	“

BVPS would like to see the Design Policy CS 7, from the BFC LDF CS document put specifically into the Policy SA1 and SA 2 of the DSSADPD but especially :

CS 7 Development proposals will be permitted which:

(i) build on the urban, suburban and rural local character, respecting local patterns of development and historic environment. All the other items on the Design agenda in CS 7 should be include in the Policy SA1 and Policy SA2 statement.

All these sites are abutting, near or not very far from Bracknell Town Centre and The Peel Centre. BVPS feels that consideration of keeping SA 1 and SA 2 in the DSSADPD as sound with potential variability and flexibility, is next to BTC and The Peel Centre in importance and every encouragement should be given to their immediate development.

BVPS notes the detail of the other sites in Policy SA1. of the BFC DSSADPD.

Edge of settlement sites

Two Binfield Sites in the DSSADPD are in the category “Edge of Settlement Sites. “ SA 3 in the DSSADPD

Both sites have planning applications on them. (March - the present 2012)

1.

The developer of the site known as “ 21 houses exiting out of Rough grove Copse, on land between Foxley Lane and Forest Rd., Binfield“ has gone to appeal (March 2012) when the application was turned down by Bracknell Forest Council Planning Committee. (17th December, 2011). It is in front of an Inspector who has accepted written statements. The residents of Roughgrove Copse carried out a rigorous campaign against the initial planning application, supported by BVPS and 85 other residents They have also forward submissions to the DSSADPD.

Mr Bell’s analysis

Analysis of CLG/ONS Housing Projections for Bracknell

Stuart Bell 14/02/12

has already been offered as evidence to show conflict in Bracknell Forest Council’s objectives and sub-objectives in the Bracknell Forest Core Strategy see pages above i.e. 2, 3-7, 8 (affects EMPLOYMENT), 9 (affects RETAIL).

It is applicable to this Policy SA 3 in the DSSADPD both for the site referred to above and

2.

A planning application to build 67 dwellings on land east of Murrell Hill Lane and September Cottage and Foxley Lane, referred to below.

A copy of Mr Bell’s Analysis is included in this part of the BVPS response to the BFC ‘s DSSADPD

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Reference Data Source

3. Table 406: Household projections¹ by district, England, 1991- 2033:
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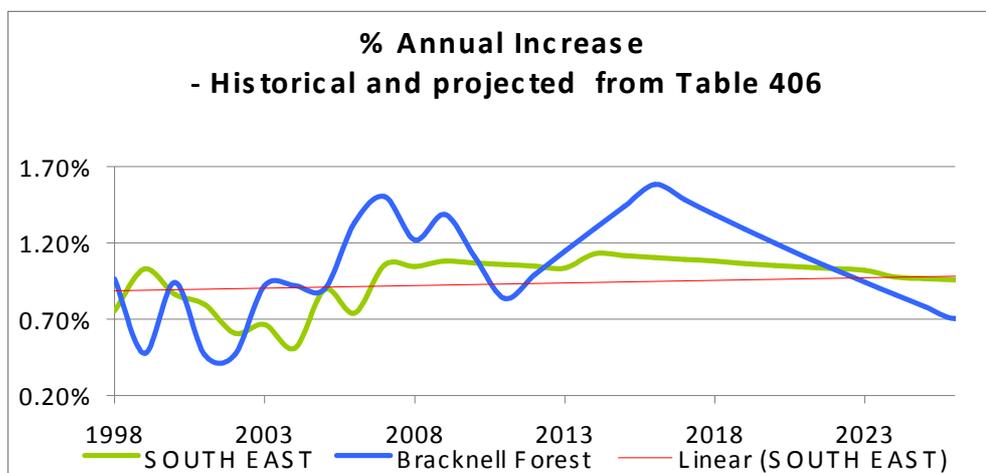


Figure 4

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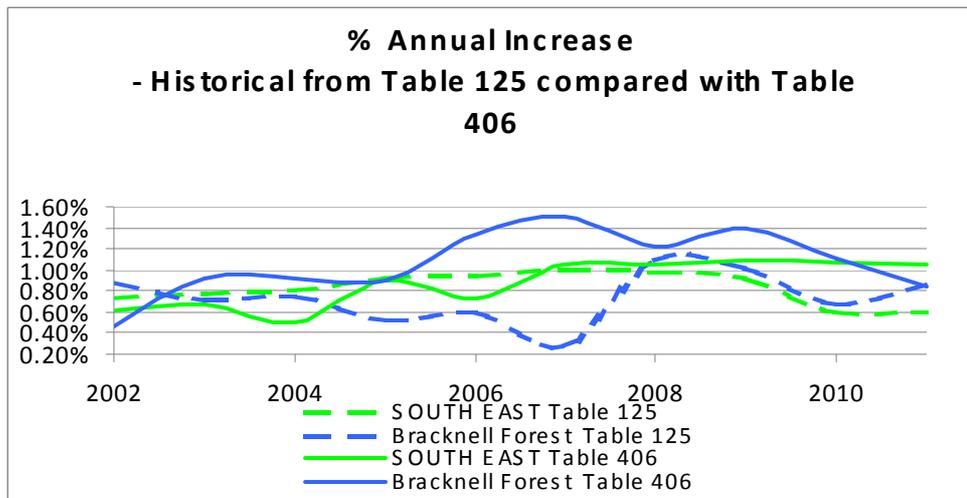


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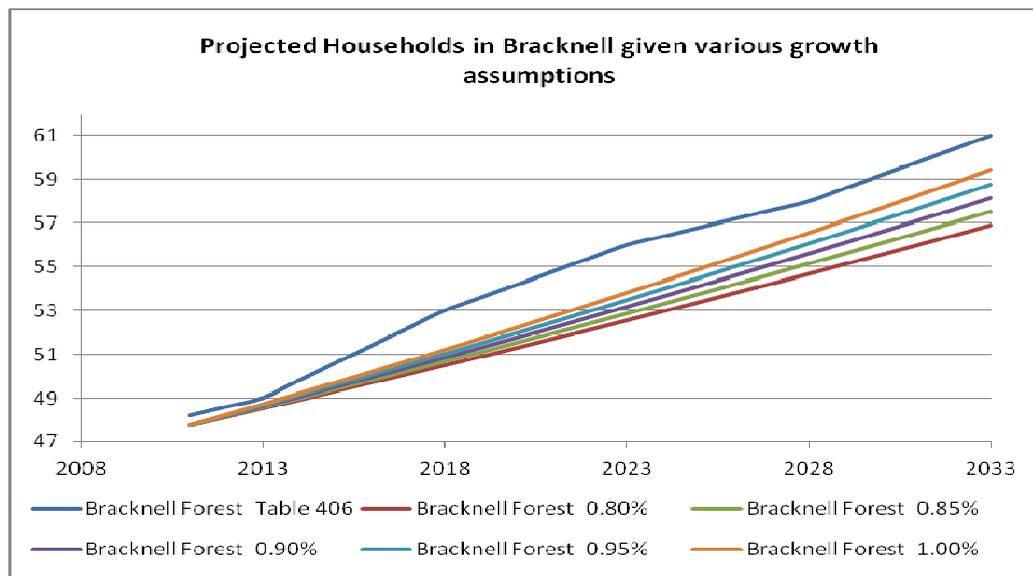


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Projections assuming 0.85% annual increase	47.8	48.6	49.4	50.2	51.1	52.0	52.9	53.8	54.2

Table 8

BVPS is concerned that there is conflict with the DSSADPD SA3 and the emerging NPPF

Using the evidence from Mr Bell, the inclusion of SA 3 in the DSSADPD is not based on up-to-date and relevant evidence about the economic, and socialprospects of the areaand that the local authority have not necessarily taken full account of the relevant market and economic signals such as land prices to inform judgements about levels of demand

proportionate evidence base

27. Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals such as land prices to inform judgements about levels of demand.

The emerging NPPF says that there has to be meaningful engagement which reflects a collective vision and a set of agreed priorities

25. Local Plans 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.

The BVPS submission is that Binfield residents are a close nit community and are very concerned to protect and enhance the village that they have chosen to live in. The residents value the countryside that edges the village and when the developers put forward an application to build the 67 houses as a contribution to the requirement of Bracknell Forest to meet their housing targets, over 150 residents write letters of objection to this application

page 19

BFC planning officers write “UP” this site in their Background Papers to the DSSADPD pages 125 - 130

BVPS submit one of 150 letters of objection to the planning application to build

EVIDENCE:

Over development in countryside outside settlement boundaries

Binfield Village Protection Society.

Established 1975.

**Ms K. P.
Senior Planning Officer
Planning and Transport
Bracknell Forest Council
Times Square, Market Street
Bracknell
RG12 1JD
November, 2011.
For the attention of Ms K.P..**

Thursday 10th

Dear Ms P.

Town and Country Planning Act 1990

Reference: Planning application 11/00682/OUT : Croudace Strategic Land Ltd.

Proposal: Outline application for the erection of 67 dwellings with associated garages, access roads, footpaths and open spaces

Location: Land at Foxley Lane and Murrell Hill Lane,

Introduction

I write as Chairperson on behalf of the Committee and Members of the Binfield Village Protection Society. The BVPS is a small pressure group which was established in 1975 to protect the rural setting of the community of Binfield: to prevent where possible large inappropriate developments both within the established settlement and outside the settlement boundary in the countryside: and to keep the identity of the village distinct by preventing urban sprawl and the coalescence of Binfield Village and Bracknell, and Binfield and Wokingham.

The BVPS has always based its arguments against inappropriate development on valid objections based on local planning policies and on national planning policies. Where pertinent, BVPS has given guidance to members of the Society and through our website, to members of the public who are seeking advice over planning issues that affect them directly.

p.1.

When asked we advise on procedure and evidence, we encourage contact with the Ward Councillors and increasingly advise that they write to their MP. Various methods of communication are available to residents via the website using links and exemplars. If asked we write a letter of objection. from the Binfield Village Protection Society.

Planning History

The site is recorded on Bracknell Forest web site as having had five previous applications to build. There were a number of applications before this online record, going back to 1954.

An application to build 41 houses on this site, reference 624865, dated 4th June 1999 was refused on 2nd November 1999 and an appeal was brought by George Wimpey plc against Bracknell Forest Borough Council. The two main issues of the day that were brought before the Inspector , in April and May 2000, were firstly the impact of of the proposal on the form and setting of this part of Binfield and the surrounding rural area: and secondly whether housing need overrides other considerations. They are the same issues today.

The Inspector, David Tester CChem MRSC FCIWEM reported on the eastern boundary of the site which forms the settlement boundary.

" p3 para. 10. It is true that the existing houses along the upper part of Murrell Hill Lane front part of the site, and from further along the lane, glimpses can be seen of some of the houses marking the edge of the village on its eastern side. Nevertheless I do not consider that the site has an urban fringe appearance or that the houses that border it, contain it, except at its northern end. In my opinion, the rural and undeveloped appearance of the locality is retained and I have no doubt about the contribution that the site makes in providing a soft rural edge to this part of the village. Previous inspectors hold a similar view. "

"p3 para. 14 Neither in my view, would the proposal result in a more defensible settlement boundary Any such extension of the boundary along Murrell Hill Lane would be vulnerable to pressures for a further extension southwards to include the cottages and gardens between the south of the ... site " and Pope's Meadow.....These substantial garden areas currently provide a rural backcloth " to Pope's Meadow. BVPS consider that this is apparent today.

Today, a building site of 67 houses beyond the settlement boundary would be a serious intrusion into the countryside, seriously affect the character of this part of the village and erode the gap between Bracknell and Wokingham. (***Berkshire Structure Plan C6***)

p.2.

As the ***Berkshire Structure Plan 2005*** is still in place ***the Policy C5 i.e.*** Land outside settlements: Land outside settlements will be **safeguarded for its own sake as a non-renewable natural resource**, still stands.

Bracknell Forest Borough Local Plan January 2002 Policy EN 8 paragraphs 2.58 and 2.59 are saved.

Other BFBLP 2002 policies that affect this application are :-

EN1 -Protecting Trees and Hedgerow cover In most respects Croudace Strategic Land Ltd as experienced developers who have worked with the BFC over renewal and development over social housing in Tilehurst Lane, Binfield, appear to have covered all aspects of the protection of trees and hedgerows. To the homeowners in Semmering, Foxley Lane and to the neighbours and residents around the proposed entrance to this development it is known that this is not the case. The issue of the felling of a significant number trees in 2009 at the entrance of the proposed development has been well covered-up by developers, Borough officers and owners alike. Who did what and when to which trees will probably never be resolved but it does undermine the general public's trust in Croudace Strategic Land Ltd's apparent concern for the trees bordering this site.

Planning permission should not be granted for development which would result in the destruction of trees and hedgerows. Croudace Strategic Land has not put forward any plans to the development of houses in the well wooded part of the site in the southern part of the site. Although they have suggested that it should provide pedestrian access and emergency access on to Murrell Hill Lane. This land belongs to owners other than the owners of the rest of the site. How long will it be until Croudace Strategic Land Ltd suggests another twenty houses should be built on this part of the site. This application should not be allowed even tho it could be with conditions to protect or enhance the trees and hedgerows, such as using BFBLP 2002 Policy EN2.

Public lighting

Binfield Village Protection Society feel strongly that BFBLP Policy EN15 should be upheld and the application should not be allowed while the risk of street lighting and house lighting in a development of this size will have an adverse effect on the character of the surrounding land and the lifestyle of small animals and nocturnal birds and animals that inhabit the area. BVPS firmly support Mr and Mrs Platt's letter of objection (September Cottage, Murrell Hill Lane) on just this issue. We are aware

that modern street lighting has been modified in design to function for safety and be unobtrusive to second floor habitation.

But "alarm" lighting against intruders and uneven car headlights would have a much more devastating affect and would chase wildlife away. The resulting glow will generally affect the character of the area and Mr Platt's work and livelihood. The application should be rejected. BFBLP Policy EN20 (vi) supports this objection to this application as does BFBLP Policy EN20 (vii)

This application to build 67 house in an established countryside area is ***contrary to the Bracknell Forest Borough Council LDF Core Strategy 2006 which states as one of its eight agreed priorities "protecting and enhancing the environment" contributes to the quality of living and working in Bracknell***

BFBC ***LDF Core Strategy*** Development Plan Document Policy ***CS1 53*** Development will be permitted which ... maintains ... " vii. the quality of natural resources including water, air ***land and biodiversity*** " and " viii. ***the character and equality of the local landscapes and wider countryside.*** "

This application to build 67 houses will be detrimental to the land and biodiversity and to the character and equality of the local landscape and wider countryside. There is pages and pages of text as evidence from the developers and from Bracknell Forest Planning Officers about the quality of the landscape and countryside and the suggested mitigation of the site if development is allowed This green space is irreplaceable and development should not be allowed.

The development proposed for this site is of a much higher density than that of neighboring houses to the north and east of the site. ***BFBLP Policy EN20 2.131*** states that the density of the existing development is a strong guide to any proposed development and in this case contributes to the objection to the application and it should not be allowed. It may be difficult for the officer to assess fully the impact of 11 small social housing units with backgardens within 12 feet of the residents gardens in the northern boundary but it is not difficult for the residents to imagine the impact of the noise and light levels of the families occupying these units. It is an overdevelopment in a rural area. It is creating an urbanized area out of a village setting which is unneighbourly and unjustifiable with in the present economic down turn when excessive development is not required.

This application to build does not harmonize with the local building patterns, ***Policy CS 7 (i)*** as it is an overdevelopment in a restricted area and the design of the houses does not reflect in any way the styles already present in the village. Croudace Strategic Land Ltd proposes building houses of 2 and ½ storeys which are suitable for town streets and

p.4.

urban exits. The houses proposed of 2 and ½ stories is unneighbourly and overbearing to the small row of rural housing already in place to the north east of the site.

The proposed development is contrary to the BFC LDF Core Strategy

Policy CS9: 110.

I Which will protect land outside settlements from development that would adversely affect the character and appearance or the function of the land.

Policy CS9 : 110 ii is in place to protect the defined gaps within or adjoining the Borough

These objections are based on former and present day Planning Policies used extensively in Bracknell Forest Council's Planning Committee's deliberations with a variety of planning applications. It is known that some changes will occur in planning legislation in the immediate future. Binfield Village Protection Society will address those changes as they occur and will use them where appropriate in objecting to this application. These objections will be forwarded to the Planning Officer as soon as the legislation is complete and can be addressed.

The Bracknell Forest Planning Committee has already discussed the draft NPPF and amongst a number of items that give cause for concern was the fact that " **the introduction of the NPPF in its present form had the potential to significantly undermine the role of the (Planning) Committee in protecting our communities, heritage and environment from harmful developments ."** (**Bracknell Forest Council Planning Committee. 22 September 2011 7.30 – 9.35 p.m.)** BVPS would like the Elected Members of BFC Planning Committee to see every detail of the proposed planning application and the objections from the residents in the local community and from the residents in the village beyond in order to make a considered judgment on whether this application should be allowed. **BVPS feel that allowing this development would be harmful to our community, our heritage and our environment.**

Landscape

The character of an area is developed and established from the landscape of a place.

Croudace Strategic's Landscape Appraisal which is in a 62 page book presented by Broadway Malayan. BVPS considers that it gives many arguments for why Bracknell Forest Council Planning Committee should turn down this application to build 67 houses in a rural part of Bracknell. The photographs and the text describe in detail the appealing character and standard of countryside which just should not be built on.

p.5.

For example : LANDSCAPE CHARECTER

p.25

Strategic Housing Site options Capacity Study (KIKHAM LANDSCAPE PLANNING APRIL 2010) The landscape capacity was judged to have a moderate to **high landscape capacity**. On the same page –

Key visual features and views which will be vulnerable to development

- Views from Murrell Hill Lane.

p.23 Local Development Framework.

- Development on extant rural plots should maintain strong links with the rural setting
- Retain the traditional character of Foxley Lane
- Existing key views should be maintained and enhanced

p.22

A strong defined edge creating a visual gap between Binfield and Wokingham which includes the garden and park of Popes Manor which contributes to a strong boundary to the site under discussion and adds to its rural appearance.

Binfield Village Protection Society object strongly to the Executive Summary on p.2 which says "Overall therefore there is a poor relationship between the site and open countryside The existing settlement edge of south-west Binfield is also poorly defined." This is an opinion. It is not a fact. Most residents would be able to provide photographs of views from gardens or buildings showing the rural aspect of the field and the view beyond. Photographs can be provided for the Bracknell Forest Planning Committee when they meet or if required before the Senior Planning Officer makes the Report for the Committee. The developers of this proposal have spent considerably longer than the three weeks that the Third parties have had to prepare their objections and we trust that we will be given considerable more time to provide photographs that dispute the above statement.

It is important to point out that the evidence Croudace Strategic Land Ltd uses to support their application to build 67 houses comes from the detailed evidence collected by BroadwayMalayan: FOXLEY LANE

BINFIELD
LANDSCAPE APPRAISAL

p.6.

which enhances the landscape picture on page after page of descriptive text and numerous photographs. Binfield Village Protection Society feel that it is evidence **not** to build within and on this gem of countryside and that the planning application should be turned down.

The established rural landscape which is adjacent to the strong settlement boundary of a variety of well- established homes with long gardens influences the wild life and other ecology of the area. The BVPS will be arranging for a professional appraisal of the wildlife concerned although residents already know what wildlife is present on a daily basis; what nocturnal animals pass through their gardens and the field and what birds are present seasonally and nocturnally. BVPS will forward their findings when they are received

Residents have observed these birds in and from their gardens. Long-tailed Tits, Song Thrush and Cuckoo (two threatened species); House Martins , Swallows, Starlings, Blackbirds, Bluetits , Coletit, Nuthatch, Wrens and Chaffinch, Robin, Dunnocks, Goldfinch, Tree creeper, Great Tits, Great Spotted Woodpecker, Green Woodpecker, Collared Doves, Ferral Pigeons Carrion Crow, Jackdaws, Jay , Magpies, Sparrowhawk, Buzzard, Red Kite, Tawny Owls and Barn Owl (on rare occasions)

This area is a micro eco system that will be totally destroyed if this development is allowed to proceed and the pleasure it gives to the families who live around these fields and have these visiting their gardens would be lost for ever.

Tree Survey

The Croudace Tree Survey report is very upbeat about the trees on the boundary of the proposed site. However, BVPS would like reassurance that the trees identified in the report as worth keeping are assigned TPO status as a legally enforceable condition of any development.

NB Several trees with TPO's at the entrance to the proposed site have been removed without any apparent BFBC counter-action. (see the experience of the removed trees already referred to)

Flooding

It is not a surprise to those of us who have lived in the area for a long time that Lanmore Consulting reported that there was a chance of 0.05% of flooding in this area. However nobody needs to be an expert in modern times to know that a lot of flooding occurs after a development has been built. Once the development has taken place and the open countryside has been built on, rain comes off roofs, over open ground now covered with bricks, paving stones, tarmac and concrete so that the soak- away

p.7.

surface of open ground is obstructed and fails to function in the time-honored way. Rain water flows into the culverts and pipes at speed and at a quantity that the ground, smooth surfaces and eventually the local rivers are overcome with flood water.

The locality has always been able to cope with its drainage because the area has never been built on to the high density of housing proposed in this application from Croudace Strategic Land Ltd. Whatever view is taken about global warming it is apparent that there are climate changes ahead and some will be bigger and fiercer than experienced in recent times. Increased rainfall can be expected and flooding will be more frequent than the 100 year occurrences that are being predicted at the moment. A new build of 67 houses will affect the present adequate drainage of open grassland on a southern slope to the detriment of the environment outside this estate.

The proposal constitutes over-development of the site. The housing density is much higher than that of the neighbouring housing. The development includes 2 and a ½ storey dwellings on land that falls away to the west and hence would seriously overlook the existing houses on Murrell Hill Lane. A development of this size is **unsustainable**.

The infrastructure of the village would not support this development. The school is over-subscribed, there will be pressure on the Surgery. This has been graphically described in several other letters of objection to this application

Sewage

It is not a surprise that the local sewage pumping station is nearly at capacity.

Residents in the area and members of Binfield Village Protection Society are very concerned at the Sewage report and the knowledge that the present system is near capacity. This application should be turned down

1. Drainage Survey – Sewerage

If the current main sewerage system is at capacity, the developers offer, as a last resort, a Self Contained Sewerage Treatment Unit! There are three major stumbling blocks to this idea.

a. There is actually no room on the undeveloped area (proposed by the developers) for such a unit. The developers propose a balancing pond in that confined area as well as retaining all the trees there.

b. Such a unit will be huge – we are talking about 67 houses not 1 or 2!

c. From the experience of these units by other villagers, the seepage of allegedly clear water will be quite substantial and sewerage smells cannot be entirely eliminated from the output from 67 houses. The seepage will probably soak into the balancing pond making it uninhabitable for wildlife.

Traffic Issues.

Residents of Binfield have a very clear picture of traffic issues through-out the village. Residents who live in Foxley Lane (top and bottom), The Roebuck, Terrace Rd South, St Mark's Rd, Popeswood Road and Sampson Park are all aware of the conflict of through traffic and residents. There is no doubt that 67 new family-sized dwellings will exacerbate the situation

We have conducted a Traffic Survey which we have attached to the hard copy of this letter of objections with pictures and comments and placed at the Borough Offices already. Plans are being laid down to repeat this Traffic Survey in order to investigate the issues further. This will be forwarded when completed

A number of questions are raised when reading the Croudace Strategic Transport Assessment. Doc. 25 and Doc 26.

- 1) para 5,1: Only one day on a Traffic assessment? BVPS did six days in total.
- 2) Para 5.6: Popeswood Rd and St Mark's Rd Junction were at near capacity at lunchtime? St Mark's Rd. and Foxley Lane were not? Could be that Bracknell offices were going for lunch in a choice of Binfield Village pubs.
- 3) para 5.9 and 5.12: Traffic Growth %ages ignore the increased housing density attributable to any nearby development (3 Firs)
- 4) Para 5.20-25 discuss Personal Accident record in the area. This is not relevant to this application Although Safety issues are. BVPS is asking the Chief Officer for a copy of the Council's Traffic Safety Policies
- 5) Section 6 references the road layout without much comment. Why not?
- 6) Section 7 discusses the additional traffic from the development +43 per hour peak. I would suggest that the figure of +43 is easily refuted. Expensive family homes and families in social housing will all have at least one car each. Many will have young working people who will all want to own a car to get them to work.
Para 7.11 "**Traffic increases within normal daily variations ... hence its impact may be considered non material**" Somewhat contradicted by para 7.13 "!when the network shows signs of congestion ... the small amount of extra traffic generated would increase delays albeit slightly" This needs careful monitoring.

- 7) para 7.17 "Drivers are unlikely to tolerate lengthy regular delays...A more likely outcome is ... different route choices" ie Ratruns
- 8) para 7.18 The development would increase traffic by 1-2%
- 9) Members of BVPS say this wrong when applied to the Foxley Lane road way. Comments such as "This must be wrong in the Foxley area , the figures relate to the whole of Binfield,"
- 10) para 8.1 Investment in capacity improvement not warranted
- 11) Section 9 summarises (for a shorter read) para 9.16 The development would cause NO HARM in respect of transport impacts further confirms the BVPS view that this development is not for the benefit of the area, the village nor yet the Borough.

Land at Murrell Hill Lane and Foxley Lane is a Site Allocation Preferred choice in the Bracknell Forest Local Development Framework Core Strategy SADPOD. Croudace Strategic Land Ltd are premature in applying for planning permission to build 67 houses on this site but it has been fortuitous for the **bvpsMembers** and residents of Binfield to see this application before the site goes out to public consultation once more as the developers' assessment of traffic issues shows clearly that developments of this kind will be contrary to BFCCS Policy CS24 and the development is unsustainable

A number of BVPS members have looked at the Croudace Strategic Land Ltd several times and they have forwarded me their opinions and findings which I am including in this letter of objection.

2.Costs of Highway Changes

Whilst the developers assert that no major changes are required to the highway layout either in Foxley Lane nor at the Roebuck pub T-junction, we believe that further study will show that substantial changes would be required at both locations if the development were to go ahead.

In that case we would expect the developers to pay for all the work at Foxley Lane, and a substantial proportion of the Roebuck T-junction work.

It would not be acceptable for local Council Tax Payers to foot the bill.

Every letter apart from this one, objecting to the application to build 67 houses on this site, starts with the phrase "an accident waiting to happen" This the public perception of traffic issues in Binfield and in Foxley Lane in particular. If it is not infact the actual position it is beholden on Bracknell Forest Council to do their own survey to placate public demands.

Transport, roads, entrances and exits through-out the village need extensive improvements and monitoring There should be no development on this site until Bracknell Forest Council sees to the transport and safety

needs of this small area of Bracknell, Binfield Village and beyond. **Only when this happens** will the communities that make up the Borough begin to accept the premise that the quality of life in Bracknell is **sustainable** and not before.

The junction at St Mark's Rd and Foxley Lane is completely inadequate for increased traffic flow. As for the access for the site this is inadequate and a potential hazard before and after Road Safety Audits have been made.

Most of the residents in this area of the village especially those living opposite the site's proposed access to the estate currently have no parking other than the kerb side.

3. Removal of the Disabled Parking Space in Foxley Lane

This is not just any parking space. It needs to be in front of the disabled person's home where it is at present. To assume that it's OK to just move this parking place is tantamount to "bullying."

It is worth repeating that Croudace Strategic Land Ltd give a nod to the existence of some traffic issues and have indicated that they can contribute something towards the solving of these issues.

Presumably the Borough would have to find the other part of "something" from residents rates and taxes to ensure that this development is sustainable. Binfield Village Protection Society object to the planning application of Croudace Strategic Land Ltd on many factors but it is unreasonable to expect residents to accept this application and to then contribute to its sustainability through their rates and taxes. It should be turned down by Bracknell Forest Planning Committee.

An important issue not mentioned since the start of this document is **Housing Need**. After considerable thought and discussion within the Binfield Village Protection Society it's the majority view that 67 houses built on a tiny piece of countryside which should be protected for future generations of Binfield families can make **no significant difference** to the Housing Need of Bracknell Forest Borough Council. Considerably more can be achieved by using available brownfield sites in the Borough, by using similar small sites within other communities of the Borough such as Winkfield and Sandhurst and by adding 67 houses to those urban extensions already approved of in the adopted Core Strategy. BVPS were very committed to the policies of the BFC Core Strategy and discussed at length the best options available to the planning officers who were putting together the Amen Corner Area Action Plan. BVPS almost had the last word, certainly wrote the final response to the ACAA plan before its approval and adoption. Our views should be considered once more.

This application to build 67 houses should be turned down by the officers of Bracknell Forest Council, the members of the BFC Planning Committee and by the elected members of the Bracknell Forest Full Council, some of whom may feel it should be included in the next BFC LDF CS SADPOD for assessment as sound. This will be rejected as unsound using this response as evidence.

Binfield Village Protection Society wish to be notified of the date of the hearing of this application by Bracknell Forest Council Planning Committee and of the final outcome of their deliberations.

There are a number of items still not explored in this planning application which together with those not yet fully discussed will, as already indicated, be addressed at a future time. The items still to undergo investigation in detail are :-

Flora and Fauna, including bats.
Birds, insects and reptiles
Badgers : living conditions and present numbers.
Traffic Safety Issues Traffic and Transport Improvements
Housing Need Sustainable quality of life in Bracknell Borough.

Yours sincerely, *Margaret Foster. bvpsChair.*

BVPS consider this letter of objection a sound rebuttal of the document in the Background Papers of BFC DSSADPD page 125 – 130 DSSADPD Background Papers SAL 49

<http://consult.bracknell-forest.gov.uk/portal/planning/siteallocations/draftsubmission>

and submit it as evidence that this site on Edge of Settlement SA3 is not sound enough to be included in the DSSADPD.

**It is contrary to the emerging NPPF , paragraph 27, 25, 164
to BFC Core Strategy CS1, CS2, CS6, CS 9, cs15, CS 16, CS 17.
To saved BFLP Policy EN8 2..57**

If BFC can prove that there is a need for 67 more houses they can be placed somewhere else in the Borough

End of evidence to support the comment that Policy SA 3 in the BFC DSSADPD is unsound

Finally the Policy SA 3 which is outside the settlement boundary, in the BFC DSSADPD is contrary to the Bracknell Forest LDF Core Strategy Policy CS9 and is therefore non-compliant with the said Core Strategy

Policy CS9 - – Development on Land Outside Settlements

The Council will protect land outside settlements for its own sake, particularly from development that would adversely affect the character, appearance or function of the land; and protect the defined gaps within or adjoining the Borough from development that would harm the physical and visual separation of settlements either within or adjoining the Borough.

and also

"In order to protect their existing open and undeveloped character, it is important that gaps are identified to steer development away from those settlements where coalescence is a real threat."

BVPS does not think this is a sound policy to be put in such an important document as the BFC LDF CS Draft Submission Site Allocations Development Plan Document which will determine the conditions and way of life of the majority of people and families who will be living here in 2032 and beyond.

URBAN EXTENSION Land at Blue Mountain ,Binfield.

BVPS does not think this is a sound policy to be put in such an important document as the BFC LDF CS Draft Submission Site Allocations Development Plan Document which will determine the conditions and way of life of the majority of people and families who will be living here in 2032 and beyond.

It is felt by BVPS that there are a number of reasons why this document is non-compliant and this, together with evidence from other sources, BVPS considers the DSSADPD to be legally non-compliant

Policy SA 7 Land at Blue Mountain, Binfield

Q. 1 Legally compliant No

Q. 2 Sound No

BVPS does not think this is a sound policy to be put in such an important document as the BFC LDF CS Draft Submission Site Allocations Development Plan Document which will determine the conditions and way of life of the majority of people and families who will be living here in 2032 and beyond. Policy SA 7 is unsound

**Q. 2a Not consistent with national policy In parts.
Not effective
Not justified**

Q. 3 see p.5 for all comments;

As proposed in the BFC DSSADPD, Policy SA7 will have excessive and inappropriate development which will include:-

- 400 residential units (including affordable housing)
- Land for a range of educational facilities, including Primary, Secondary and Special Educational needs
- Multifunctional community hub
- New football ground
- On-site open space and Suitable Alternative Natural Green space (SANGS)

BVPS believes that the Policy SA 7 conflicts with some (possible more) national policies of which two will be mentioned at this stage

Response by Binfield Village Protection Society (BVPS) to Bracknell Forest Council's LDF Core Strategy DSSAPDP on 12 th March 2012. on :-

Policy SA 7 k/a Blue Mountain

NATIONAL POLICIES. as at 12th March, 2012.

Planning Policy Guidance 17 ...

They should seek to ensure that all proposed development takes account of, and is sensitive to, **the local context**.

17. Local authorities should:

- i. avoid any erosion of recreational function and maintain or enhance the character of open spaces;
- ii. ensure that open spaces do not suffer from increased overlooking, traffic flows or other encroachment;
- iii. protect and enhance those parts of the rights of way network that might benefit open space; and
- iv. consider the impact of any development on biodiversity and nature conservation.

Enhancing Existing Open Space and Sport and Recreational Facilities

Planning Policy Statement 12 ...

Development Plans in the Planning System : Chapter 2 page 6.

PRINCIPLES

2.1 The local development framework should contain within its documents, an integrated set of policies which are based on a clear understanding of the economic, social and environmental needs of the area and any constraints on meeting those needs. The strategy and the policies in local development documents should relate to the geography of the area and be founded on its physical and demographic characteristics, internal and external links and relationships with neighbouring areas.

2.2 The format of local development documents should be clear, succinct and easily understood by all, (**see note 1 below**) with the strategy and associated policies expressed in terms which emphasise the means and timescale by which the objectives derived from the spatial vision will be met. A comprehensive and credible evidence base should underpin the policies in local development documents.

The core strategy ... plans for key areas of change ...

2. 17. iii. protect areas particularly sensitive to change;

It seems appropriate to deal with the issue of clarity at the stage

Note 1

- **The public consultation process over four stages and taking almost two years to complete had many difficulties**

1. Stage 1 of the BFC Site Allocations Development Plan Document consultation process flouted the convention of a “purdah” and started within two weeks of the announcement of a General Election. The date had been discussed in the media for several weeks since before Christmas (2009 – 2010)
2. The proposal of the Northern Arc had been put forward and placed on the map used in the Stage 1 of the SADPOPD public consultation and appeared to be a development of several thousand units and threaten the erosion of Cabbage Hill, A developer, Interlaken, was apparently available with plans covering 3000 homes (as above PPS12, Chp.2, page 6, 2.17.iii protect areas particularly sensitive to change) .
- 3 The vocabulary of the first public consultation document was so dense and unfathomable that the general public were frustrated and hostile to the local authority officers and their so-called spatial planning. The hostility to the planners was still present at Stage 3
- 4 The 7000 comments to Stage 1 of the SADPOD made on the social media were cut by “professionals” to 1,400 recorded responses which appeared to say “dump development in Binfield “
- 5 The Stage 2 of the SADPO included 15 representatives from the Binfield village who were expected to play a planning game of where to put the 400 houses proposed for the site , SA 7 Blue Mountain. The representatives found this stage of public participation unhelpful. As agreement could not be reached the representatives left.
- 6 The results of the first public consultation were not reported to the BFC Executive until long after the date that was scheduled at the beginning of the process (March 2010)
- 7 When the results of the public consultation were know suspicions were laid down about the validity of the Stage 1 consultations and of the interpretation of the results. It became apparent that whatever the **intentions** were of the 7000 comments made on the social media, they were ignored. It was thought that the result of the SADPD Appendix C (Revised) also called The Broad Areas Draft Indicative Option Working Papers was thought to have been “broadly “ written before the public consultation period started. The choice for the public from the eight broad areas first put forward in March 2010 was halved to four areas including the Bracknell Town Centre. Housing were squeezed into three of the Broad Areas first put forward at the beginning of 2010.
- 8 The public consultation of **Stage 3** of the BFC SADPOPD. which came out in November 2010 was, despite the officers’ claims of improvements in the documentation and sound reasons for choosing so many sites in Binfield, just as obtuse and obscure as the Stage 1 document. There were **700 replies to this** document when the Stage 3 consultation period closed in January 2011

2.2 The format of local development documents should be clear, succinct and easily understood by all .

Young residents, new to the community but concerned about the inappropriate development on the SA7 site were perplexed about the meaning of “soundness” in the final Draft Site

Page 9.

Allocations document Older residents could see no change after they had spent considerable time and effort taking part in consultation. Complaints were made that the consultation seemed to be a one-way thing. Questions about the meaning of democracy were raised

Despite the difficulties itemized above the residents of Bracknell have taken an active part in the consideration of these plans and for us all to reach the Draft Submission Site Allocations Development Plan Document to find **no change** in the policies proposed is a serious indication that Policy SA7 is not flexible. SA7 is unsound.

I make no apology for the detailed comments on the **Process** of the publication of the documents and the public participation in the consultation over each document because I think the “process” is **flawed** and therefore **undermines the soundness of the DSADPD**.

In May 2011 three pressure groups, Binfield Village Protection Society, the Northern Arc Action Group and Crowthorne Village Action Group (BVPS, NAAG, CVAG.) compiled and produced the results of a Survey , the Bracknell Forest Housing Development Plans: Local Residents Survey

The page pertinent to the Policy SA 7 is included at this point. (Note 2, p. 17. The Survey - below)

Page 17, BRACKNELL FOREST – HOUSING DEVELOPMENT PLANS. Local Resident Survey Results.

Residents’ concerns centred around:-

- Destruction of an extremely popular and successful pay & play golf course
- Coalescence of Binfield Village and Bracknell and resulting loss of community identity
- Loss of an important green gap between communities,
- Loss of a popular local venue for weddings and other celebrations
- Loss of a major venue for business conferences, events and auctions
- Loss of open green space and wildlife habitats
- Loss of venue for popular dinner dances, music shows and other social events
- Loss of a well used exercise and dog walking circuit around the golf course
- Loss of quality meeting facilities for local groups, societies and companies

‘Blue Mountain is countryside and shouldn’t be built on - it helps to keep Binfield as a village separate from Bracknell’ - RG42 4EE

‘The loss of Blue Mountain Golf Course would cause an urban sprawl which would engulf Binfield as a village into an outer boundary of Bracknell’ - RG42 4EZ

‘Insane to build on Blue Mountain’ - RG42 4AZ

‘We use the Golf Club for our Netball club social events so would be terrible to lose it’ - RG42 4DJ

‘It is now a valuable recreational facility for a lot of people not only in Binfield’ - RG42 4EJ

‘I think it’s a terrible idea to build on the Blue Mountain golf course. It will change the semi-rural environment of Binfield beyond recognition!’ - RG42 4DZ

‘I have been playing my golf at Blue Mountain Golf Course since 1997 and is an essential social venue for me as well as an excellent way to stay fit and healthy. I am retired. The closure of the golf club would be a sad day’ - RG6 5UA

‘These amenities for leisure will be needed even more if the area has a larger population’ - RG42 1FJ

‘Blue Mountain is needed for golf & as a green buffer between Bracknell & Binfield’ - RG42 4AD

‘It should stay as it is at present - golf course for the public’ - RG42 4UN

- Loss of Crown Golf a well respected and successful local employer
- Incredulity at the proposed relocation of a football stadium for a club which has no roots in Binfield. Many commented on the fact that Binfield has its own highly successful football club in the same division as Bracknell Town.

A substantial number of survey respondents felt that there should be no development of the land occupied by Blue Mountain Golf Course (in line with the Council's original stipulation in 1990 and their subsequent Core Strategy - CS9) and that it should remain as a significant local employer, a significant green gap and a much used amenity for the Borough.

The Results of the Survey were presented to Bracknell Forest Council in May 2011.
(Note 2. p 17 The Survey)

The issues and results are very similar to those raised in the Stage 1 SADPODP consultation document but the number of residents who took part is **more** than the final number who were counted in as having made valid responses to the Stage 1 consultation document in April 2010 i.e. 1600+ : 1400+

BVPS considers the Survey "robust and credible evidence " that proves that development on the site SA 7 is unsound

A hundred copies of the Survey were published and copies were sent to the three MPs who represent the residents of Bracknell, of Binfield and Warfield who are in the constituency of Windsor and Maidenhead and the MP for Wokingham, elected members of Bracknell Forest Council and to several senior planning officers. Most Council Members ignored the Survey. . Although after some delay members from each group were able to meet and question their Ward Member.

Single pages of the Local Residents Survey will be referred to in other submissions. A number of copies are still available in published hard copy form.

Position of Policy SA 7, in the DSSADPD, in relation to the Bracknell Forest Council Core Strategy. Adopted February 2008

There is considerable conflict between SA 7 and the following Core Strategy Policies : -

CS 1 Sustainable Development Principles: p 15
CS 6 Limiting the Impact of Development p 20
CS 7 Design p.21
CS 8 Recreation and Culture p 22 para. 123 Local Gaps.
CS 9 Development on Land Outside Settlements 1. protect the defined gaps ...

Policy CS1: Sustainable Development Principles

Development will be permitted which;
i. makes efficient use of land, buildings and infrastructure; and
ii. is located so as to reduce the need to travel

As well as the townscape principles that should be adhered to (above) BFC Core Strategy states that Sustainable Development Principles should **protect and enhance** the ...

vii. the quality of natural resources including water, air, land and biodiversity and
viii the character and quality of local landscapes and the wider countryside and the
ix the historic and cultural features of acknowledged importance

Choosing SA7 for developing

- 400 residential units (including affordable housing)
- Land for a range of educational facilities, including Primary, Secondary and Special Educational needs
- Multifunctional community hub
- New football ground
- On-site open space and Suitable Alternative Natural Green space (SANGS)

removes important Open Space of Public Value. Suitable Alternative Natural Green Space would never replace the green “lung” between Binfield and Bracknell. This land fulfils an important function in maintaining the separate identities between two settlements

Development on the proposed scale is therefore in conflict with the CS CS9

“ Paragraph 105 Inherent in the Council’s strategy is that existing Recreational Facilities are to be retained and the Council will resist the loss of existing provision . Policy CS8 contains provisions that will protect existing Recreational Facilities from pressures from development that might result in their loss to the community.” Swapping a golf course for a Football Stadium will not improve the quality of a Recreational Facility. Noise, lights, sound and traffic disturbance is the offering of a Football stadium which will be shared with another club, have matches every weekend and possibly practices every night.

Similarly a range of Educational facilities is not the gift Binfield are supposed to say thank you for. This “educational facility” is to be made available to every community around the SA 7.site. Bracknell Borough should think beyond the frame and look to Crown land on the east of the Borough. Arrangements should begin to lay the foundation stone of a new Academy School called the Queen Elizabeth II Academy School. Secondary children can cope with longer journeys and a school to equal Garth College would be an asset to the larger community.

A community facility similar to the one run by Bracknell Town Council on land with in the Binfield Parish boundary, at Jocks Lane would be an asset to the community. Built on open space it would be small enough not to encroach to much or erode the green gap

The policy of gaps between settlements is an important planning policy which the Borough has managed to retain from earlier aggressive changes to planning policy. They are so important they must be retained.

Paragraph 119 says “One of the functions of the countryside is to help preserve the physical and visual separation of settlements by protecting the rural areas between them” The most effective of these areas are those which prevent the coalescence of significant settlements with particular identities such as Binfield and Bracknell “The identification of Gaps is well supported by the local community as a method of preventing the erosion of the countryside and protecting the individual identities of settlements.”

As the value of Gaps is clearly identified in the BFC Core Strategy Policy CS9 the SA 7 in the DSSADPD is in conflict with this policy and this contributes fundamentally to the unsoundness of the important document

Policies CS 8 and CS 9 confirm that this policy, SA 7 is not justified and should not be in the Draft Submission Site Allocations Development Plan Document

Bracknell Forest Borough Local Plan has many Saved Policies which contribute to the importance of retaining Open Space of Public Value such as EN1, EN2, EN4, EN8 2.57, H12, R1-i.e. loss of open space of public value

Blue Mountain i.e. SA 7, the Gap between Binfield and Bracknell has had a long history of protection from any inappropriate development.

North Bracknell Local Plan

Development Committee (Policy) Meeting - dated 11.05.1989

Blue Mountain golf course was seen as providing a permanent protection to the green gap between Binfield and Bracknell.

5. Supplementary Planning Guidance

On 30 March 1989 the Development Committee raised no policy objections to the release of land for housing on this site subject to:-

“Planning Committee Conclusion

- 1. arrangements being made, to the satisfaction of the Council, to protect land at Park Farm, Binfield (later known as Blue Mountain) lying to the north of the protected line of the North Bracknell Distributor Road from development (other than for leisure purposes) which would detract from or threaten the long term maintenance of the physical and visual separation of Binfield from Bracknell.*

2. *The line of the NDR and the location of the housing and hotel south of this line, with the golf course to the north, accords with the Borough Council's desire (and Structure Plan Policy EN6) to maintain a 'gap' between Binfield and Bracknell;*
3. *However the Golf Course will help to secure the long term protection of the gap"*

Slightly later in 1990 an important agreement was signed

THIS AGREEMENT is made the 16th February day of One thousand nine hundred and ninety BETWEEN BRACKNELL FOREST BOROUGH COUNCIL of Easthampstead House Town Square Bracknell in the County of Berkshire (hereinafter called "the Borough Council") of the first part THE COUNTY COUNCIL OF THE ROYAL COUNTY OF BERKSHIRE of Shire Hall Shinfield Park Reading in the County of Berkshire (hereinafter called "the County Council") of the second part BRACKNELL TOWN COUNCIL of Brooke House High Street Bracknell Berkshire (hereinafter called "the Town Council") of the third part LUFF FARMS LIMITED of Mortimer House 37/41 Mortimer Street London W1N 7RS (hereinafter called "the Owner") of the fourth part

The agreement was reached between four parties Berkshire County Council, Bracknell Town Council, Bracknell Forest Borough Council and the owners called at that time Luff Farms Ltd., now known as Luff Developments.

The Section 52 Agreement clearly states that

1. Development at Blue Mountain would be a breach of covenants, Section 52 Agreement, and lease agreements, that place clear obligations on the land owner:-
'not to use the Golf Course Land for any purpose other than as a golf course for the provision of sporting or other recreational facilities or as open space and not to construct any buildings on the Golf Course Land other than as reasonably required in connection with any of the uses mentioned in this paragraph'

Source: Section 52 Agreement

Page 40.

The Section 52 Agreement was further reinforced under HM Land Registry Title dated 17th January 1994 Title Number: BK285444:-

7.1 to observe and perform the provisions of the section 52 Agreement in so far as they relate to Luff Lands;

7.2 not to commit any breach in respect of the Luff Lands of the section 52 Agreement;

And as already been noted

2. Development at Blue Mountain would break clear long term commitments made by Bracknell Forest Council to:-

'protect land at Park Farm, Binfield lying to the north of the protected line of the North Bracknell Distributor Road from development (other than for leisure purposes) which would detract from or threaten the long term maintenance of the physical and visual separation of Binfield from Bracknell'

Source: Development Committee Meeting 11.05.1989

So on behalf of Binfield Village Protection Society, I find Policy SA7 of BFC LDF CS DSSAPDP as follows : -

Policy SA 7 Land at Blue Mountain, Binfield

Q. 1 Legally compliant No

Q. 2 Sound No

BVPS does not think this is a sound policy to be put in such an important document as the BFC LDF CS Draft Submission Site Allocations Development Plan Document which will determine the conditions and way of life of the majority of people and families who will be living here in 2032 and beyond. Policy SA 7 is unsound

**Q. 2a Not consistent with national policy In parts.
Not effective
Not justified**

BVPS members do not want a second Football Arena. As supporters of Binfield Football Club the needs of the community are well met. The education scheme is enormous and is for the benefit of other communities not for the Binfield community. BVPS have considered for some time I think overtures can and should be made at a very high level for the purchase or long term use of Crown Land.

I would have liked to respond fully on behalf of the members of BVPS to Amen Corner South and Amen Corner North especially as , with the co-operation of the BVPS Committee of the day (2008) BVPS made a detailed response to all relevant policies to the Amen Corner Area Development Plan (2009) but I have reached the deadline for the responses to the BFC DSSADPD. Perhaps it will be possible to respond to the Final Submission by Bracknell Forest when the document is in front of the Inspector at the Public Hearing at the end of 2012.

All these Submissions are in response to the Bracknell Forest Council's Draft Submission Site Allocations Development Plan Document. I trust they will be considered carefully by the Inspector chosen to hear the submissions in a Public Inquiry

I would be grateful if the final decision could be forwarded to me on behalf of the Committee and members of Binfield Village Protection Society.

E. Margaret Foster
Chairman
Binfield Village Protection Society
Southfield St Mark's Rd., Binfield , Bracknell, Berkshire, RG42 4AT.

12th March, 2012.

Margaret Foster.