



# Crowthorne Village Action Group

CVAG protecting our village against urbanisation

15 Knowles Avenue  
Crowthorne  
Berkshire  
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Development Control  
Bracknell Forest Council  
Bracknell

## Response to Consultation on Draft Bracknell Forest Local Plan

Dear Sir

We are pleased to submit our response to this public consultation on the Draft Local Plan. In the past, hard copies of consultation documents have been made available on request to local stakeholder groups who wish to evaluate the proposals and respond. We were disappointed to be informed that this time a hard copy would only be available to groups which pay £50. A PDF can be downloaded from the website, but it is tiring to read such a long document on a computer screen and doesn't really give a good opportunity to digest the contents. It is understood copies are also available in the public library and Parish council offices, but it really isn't practical to sit in those places for the time taken to read all 287 pages.

I would hope that this was a temporary aberration and in future consultations you will revert to making a copy available, without charge, to established stakeholders who wish to respond.

When it comes to the external examination we will be questioning whether charging £50 a copy does indeed meet the requirements for a "public consultation."

Specific points which we raise in response to this consultation are as follows:

### **P41, Policy LP4 and Fig 9 P210 Land at the Hideout**

If implemented this development would occupy the existing strategic gap between Crowthorne Village and Bracknell town.

At the time of the external inspection into the site allocations local plan (SALP 2013) the external inspector made a particular point that the existing gap between Crowthorne Village and Bracknell was in danger of being eroded by the TRL development and needs to be maintained. Consequently the council were required to amend their plans in order to ensure they maintained a distinct gap between Crowthorne and Great Hollands estate in Bracknell.



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See also following comments on P76, list of strategic gaps, where we object to the omission of the Crowthorne-Bracknell gap from the list of strategic gaps.

This site is an isolated one, not connected to either Bracknell, Wokingham or Crowthorne. As such it is not sustainable unless internal provision can be made for services to support an independent community. Par 6.31 references that there is also an existing vacant office building which is subject to a separate proposal for residential development. We understand that this proposal is for an additional 100 homes. It would seem logical that the infrastructure requirements for policy LP4, 570 homes should actually consider the infrastructure requirements for 670 homes. This larger number may require additional support for shops, schools, medical care etc.

As well as being a strategic gap, maintaining distinct identity of the village, this is also a green corridor which, since the construction of Bucklers Park on the TRL site, provides the last remaining wildlife corridor between the large area of Swinley Forest and the farmlands to the West.

It is contrary to:

*P145 LP36*

*Avoid the net loss or fragmentation of habitats and support the creation of coherent ecological networks through both urban and rural areas such as improvements to Biodiversity Opportunity Areas.*

*P150 LP38, Par v.*

*...not fragment green infrastructure assets or create barriers to the movement of people, biodiversity and water through the green infrastructure network .*

On the map Fig 9 P210 Cluster 3, the Hideout is shown as an extension to Bracknell town and CIL will go the Bracknell Town Council. Yet all exits go towards Crowthorne so residents will naturally gravitate towards using facilities in Bucklers Park and Crowthorne Village.

One of the exits is on to the B3430, Nine Mile Ride, where it will contribute additional traffic, and associated NO<sub>2</sub> pollution where the B3430 passes immediately adjacent to the perimeter of the Thames Basin Special Protection Area between Golden Retriever roundabout and Coral reef. This road is already congested with long traffic jams at peak hours, and destined to become more so when the 1,000 houses allocated for TRL , 1500 houses allocated by Wokingham Borough council at Hogwood Lane and others at Arborfield are occupied. A full assessment needs to be conducted to assess both current levels of NO<sub>2</sub> at the SPA and estimate future levels based on developments which are known to be in the pipeline. It will also contribute some additional traffic to the Crowthorne AQMA, where, according to the 2017 Air quality report from BFC, NO<sub>2</sub> levels are already 25% above the statutory limit.

## **Amendment**

This policy should be dropped as it is contrary to:

- Local Plan Policy on maintenance of strategic gaps.
- Maintenance of wildlife corridor.
- Need to site new development so it does not add to problems in an existing AQMA.



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If it is to go ahead in some form, then the council should either :

- a) Amend plan so exits are to Great Hollands ring road
- or
- b) Amend settlement boundaries so it is an extension of Crowthorne and CIL goes to Crowthorne Parish.

LP4 should be amended to add internal provision of additional services and infrastructure to support an independent community.

A full assessment of NO2 levels along the B3430 boundary with the SPA should be conducted, including a projection of additional contribution from other planned developments in the area.

## **P72, 11.1.8 Development Affecting Countryside**

Policy LP11 vii supports development of previously developed land, which 11.1.8 categorises as land identified in the Brownfield register. Part 1 of the Brownfield register published by BFC is a broad brush which may include land not suitable for housing. Part 2 will be land which has had a more thorough assessment and, if necessary, been subject to consultation.

### **Amendment**

Amend Text in 11.1.8 to read:

Previously developed land includes land identified in Brownfield land register Part 2

## **P76 11.2.12 Strategic Gaps**

The list of strategic gaps omits the gap between Bracknell and Crowthorne .

The strategic gap between Crowthorne and Bracknell has been identified in the Core Strategy 2008. At the time of the external inspection of the SDL , in 2013, the inspector, Michael Heatherington placed great importance on respecting the strategic gap. He required the council to reconfigure development within the TRL site so as to leave an acceptable gap between Crowthorne and Bracknell.

In Sept 2015, Table 4.3 of “Bracknell Forest Landscape Evidence Base Recommendations in relation to landscape designations, gaps and green belt villages”, recognises the Strategic Gap between Crowthorne and Bracknell

As recently as June 2016 “The Comprehensive local Plan issues and options” , para 9.1.2 includes the gap between Crowthorne and Bracknell.

It is surprising that such an important change, eliminating the protection offered to an established strategic gap between two independent communities, should be proposed without any rationale, justification or even a mention that it is being dropped. Indeed burying it on page 76 of a 287 page document does suggest that someone may be trying to slip it under the radar.



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## **Amendment.**

Reinstate gap between Bracknell and Crowthorne into list of strategic gaps

## **P108 LP24, Affordable Housing**

Policy LP 24 allows financial contribution to offsite provision of affordable homes as an alternative to provision. However it lacks any commitment that these homes will ever be available and it opens a large loophole in the government policy of providing more affordable homes. Evidence from a recent question to BFC suggests that building of affordable homes in Bracknell is running at about 5%, well below the target. Part of the reason for this may be that although developers are being permitted to reduce the percentage of affordable homes in return for a financial contribution to affordable homes being built elsewhere, there is no evidence that these homes are ever actually built.

## **Amendment.**

Amend Policy LP24 to include wording:

“Contribution to offsite provision of affordable housing shall be permitted when such offsite provision is identified, allocated and fully funded.”

## **P111, Housing Mix**

We would like to verify the basis for Table 6, Housing mix. We are surprised that the mix for market housing is shown as

1 Bed 5-10 %

2 bed 25-30 %

3 bed 40-45%

4+ 20-25%

That doesn't sit with our understanding of the need for more smaller homes for single people and young couples. A recent comment from L&G, developer of Bucklers Park, commenting on the release of Phase 1 homes “The one bedroom apartments sold out overnight” supports the perception that there is a need for higher proportion of one bed apartments for market homes.

## **Amendment**

Could the council review and verify that the SHMA findings, which covered a large area, both urban and rural, are actually applicable where developments are proposed in villages surrounding Bracknell.



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## **P140-2, Historic Environment ,**

Para 16.1.10 is welcomed as it recognises the importance of non-designated heritage assets.

Until now BFC hasn't maintained a list of non-designated heritage assets. If they did we may have been able to save the façade of the Waterloo Hotel.

### **Amendment**

Add to policy LP35, Para C:

The council will prepare and maintain a list of non-designated heritage assets.

## **P171 -174 LP43, Pollution and Hazards**

In general we welcome section 18 on Pollution and hazards including;

### 18.3.3

*...to ensure new development proposals do not generate pollution or hazards which unduly impact on the surrounding environment;...*

### 18.3.24

*It is therefore important to ensure that new development proposals, either individually or cumulatively, do not significantly affect new or future occupants within or adjacent to an AQMA by generating unsatisfactory air quality.*

### LP 43

*Development proposals should neither individually nor cumulatively have an adverse effect on human health and safety*

We would like to see this obligation of the planning process, to avoid contributing additional pollution in areas where there is already an AQMA, clearly reflected in the policy wording.

We already have an AQMA in Crowthorne High street where, according to the BFC report in 2017, the levels of NO<sub>2</sub> in 2016 are already 25% above the statutory maximum. This can be expected to get worse when the additional houses already planned for both ends of Crowthorne High street, at TRL and Cricket Field Grove, are built.

We would like to draw the council's attention to the recent judgement **Wealden District Council v. Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority [2017] EWHC 351 (Admin)** in which the Lewes core strategy was overturned because they had not correctly assessed the cumulative effect of new developments, including those in adjoining boroughs, on sensitive habitats.

### **Amendment**

Add to Policy LP43

Add wording

*"In order to maintain compliance with national legislation on air quality, there should be a presumption against granting of permission for any new development which would add additional traffic to an existing AQMA until the exceedance in the AQMA has been demonstrated to have been rectified."*



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## **P184, LP47, Transport Infrastructure Provision**

Since the government has set a target to halt production of petrol cars by 2040 it is surprising that there is little reference to provision of electric vehicle charging points. It is presumed that homes built during this plan period will still be in use in 2040. It is important that provision of charging points is recognised at an early stage as this may have a consequent impact on infrastructure delivery, particularly capacity of the electrical infrastructure.

### **Amendment**

Add to LP47 para x, provision of parking

x Provide an appropriate level of parking.... “and electric vehicle charging points.”

## **P210 Fig 9, Site Allocations for Residential Development**

See earlier comment on exits from this development.

The map is not up to date as it doesn't show the new development at Oakham Park, therefore giving a misleading impression of the residual gap between Crowthorne Village and the proposed new Cluster 3.

### **Amendments**

1. Update map
2. Either
  - c) Amend plan so exits are to Great Hollands ring road
  - or
  - d) Amend settlement boundaries so it is an extension of Crowthorne and CIL goes to Crowthorne.

## **P226 Table 17 and Fig 19 Derby Field**

Development of Derby field provides an opportunity to remedy two current problems in Crowthorne.

- Insufficient parking at Crowthorne station.
- Lack of public transport connection from the station to Crowthorne Village.

These should be included in the plan.

Without provision of a bus service residents would use their personal cars to access Crowthorne High Street, which would place the council in breach of LP43 on air quality. It would be good to have an off road turning space where buses can turn and load without impeding traffic on Dukes ride.



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It is noted that this development would require an extension to the settlement boundary. Currently this field is within the Parish of Sandhurst. We already have 3 parish councils looking after separate parts of Crowthorne Village, Crowthorne Parish Council, Wokingham without Parish Council and Finchampstead Parish Council. We do not need a fourth.

Since the new residents will be accessing facilities in Crowthorne Village, there should be an extension of the Crowthorne Parish boundary to encompass this new development.

## Amendments

Add to list of requirements:

- Provision of additional parking spaces for Crowthorne Railway station.
- Provision of bus turning point for new bus service to support this development and provide access to Crowthorne station from the Village centre.

This will require a revision of the number of homes which can be accommodated on the site.

Amend both settlement and parish boundary so this development is an integral part of Crowthorne Village

Thank you for the opportunity to comment on this consultation.

Yours sincerely

Andy Holley

Crowthorne Village Action Group

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Crowthorne Village Action Group (CVAG) is a non political association of residents who seek to protect the established character of Crowthorne Village and ensure that future developments are in keeping with their surroundings.



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