

In 2014 RBWM conducted an Edge of Settlement Analysis on which residents were invited to comment. This was to obtain residents views on which areas of Green Belt could lose their Green Belt Status.

At that time the Holyport Residents Association (HRA) of which I am Chairman, asked Holyport Residents to take part in a related survey to assess views on areas near Holyport. This survey provided a form to be completed either on leaflets that were distributed door to door or on line.

Additionally, both HRA and the Holyport Preservation Society (HPS) produced reports and submitted them to RBWM on 21st March 2014, together with independent reports on Traffic and Ground Water which were commissioned and paid for by the HPS.

The HRA and HPS reports and submissions continue to be relevant for this 2016 RBWM Draft Local Plan consultation and can all be accessed and downloaded as PDF files from here;

<http://www.holyportresidentsassociation.org/hra-submission-to-rbwm.html>

The following table is the Document Index for the HRA submission of 21st March 2014

Doc.	Title	File Name
1	Index & Introduction together with Holyport Area Residents responses to an HRA survey, including HRA summary and comment.	HRA1_RBWM_LP_Summary.pdf
1a	HRA Survey – Holyport Area Residents – Results	HRA1a_RBWM_LP_Survey.pdf
1b	RBWM form for responses, completed to indicate Residents majority views.	HRA1b_RBWM_LP_Form.pdf
2	HRA comments against each of the RBWM paragraphs in their edge of Settlement Analysis for Area 7A.	HRA2_RBWM_LP_7A.pdf
3	HRA comments against each of the RBWM paragraphs in their edge of Settlement Analysis for Area 5C.	HRA3_RBWM_LP_5C.pdf
4	Additional Flood Photographs.	HRA4_RBWM_LP_P.pdf
5	Report on Traffic Pollution by Bray Parish Councillor Peter Janikoun.	HRA5_RBWM_LP_TP.pdf
6	Highway and Transport Representations - Commissioned by the Holyport Preservation Society.	HPS_RBWM_LP_Highways and Transportation.pdf
7	Assessment of Flood Risk – Holyport Area - Commissioned by the Holyport Preservation Society.	HPS_RBWM_LP_Hydrology.pdf

Current updates, including a copy of this current submission are shown here;

<http://www.holyportresidentsassociation.org/local-plan-2016-2017.html>

On 17th February 2015, RBWM agreed with Holyport Area Residents by deciding that Green Belt in the Holyport Area would remain as Green Belt. One of those areas was then designated by RBWM as Area 5C, and RBWM now identify it as Area HA9.

Now in 2016 / 17 RBWM have reneged on their promise about Area 5C (HA9) by proposing that it will lose its Green Belt status and be used for housing and industrial warehousing. Some other Green Belt areas which RBWM promised would remain as such, RBWM now also intend will lose their Green Belt Status.

Area 5C / HA9 is currently (January 2017) subject to a demand from Highways England for part of it to be used for their works associated with the M4 Smart motorway. I claim that the consultation that Highways England carried out as required by the Planning Act 2008 did not include consultation about the use of that land for their Main Construction Compound, and that consequently RBWM should not have agreed that Highways England may use the land. I have asked for clarification on this from Highways England and assessed their report on the consultation that they performed. I have reported my concerns to our MP Theresa May, and as of 9th January 2017 I await her response. It should also be noted that even if Highways England do use that land, the fact of their use of it will not alter its Green Belt status.

The HRA will not be consulting residents as we did in 2014. Instead the HRA will contact HRA Members and other Holyport Area Residents whose email addresses we have, advising them of this document and inviting them to support it or provide their own comments on the Local Plan.

Personally I consider that RBWM, by reneging on their former decision, and failing to protect Green Belt as the RBWM Conservative Manifesto states they will (Conservatives have an overwhelming majority in RBWM) have demonstrated that they cannot be trusted.

The Conservative Manifesto may be accessed here;

<http://www.holyportresidentsassociation.org/local-plan-2016-2017.html>

On the manifesto page 8 we have an unequivocal promise to PROTECT THE GREEN BELT. On earlier pages we see that they claim to have previously delivered every one of their commitments, and on page 5 they say that they "AIM TO REPEAT OUR COMMITMENT TO DO AS WE PROMISE".

I consider that to change Area 5C (HA9) from Green Belt to a business park is wrong and that residents should vote against the change, sending a strong message to our Councillors that RESIDENTS DO NOT APPRECIATE BROKEN PROMISES.

I show between the horizontal lines below an excerpt from the HRA submission of 21 March 2014 where we summarised the responses received from residents (Area 5C is now known as Area HA9);

Responses were received from 513 people, 226 being online and 287 by paper.

At our last check there were 2840 persons on the voters roll for the area so this is 18.1% of the Holyport area population.

As the normal response rate to consultations is less than 4% this gives a measure of how seriously people are taking this.

A summary of responses follows, using the question numbers on the results sheet;

Q5	A question asked on the online survey but not on the paper survey was; Do you want to personally answer the RBWM Consultation or have the HRA make a single submission taking into account the views provided by you and other residents? 83.6% (of 226) replied that they wanted the HRA to answer for them.
Q6	89.9% said that they do not support development on undeveloped Green belt land.
Q7	Within areas of recognised settlement within Green Belt – such as Holyport, 206 (40.2%) do not support any development, but 294 (57.3%) support domestic extensions, 262 (51.1%) support garages, 239 (46.6%) annexes and 176 (34.3%) small developments.
Q8	497 persons (96.9%) do not want housing on Area 7A.
Q9	452 persons (88.1%) do not want housing on Area 5C. 32 persons (6.2%) support the hospital proposals of Dr Phillip Lee for Area 5C. 25 persons (4.9%) support some housing on Area 5C in exchange for public open space.
Q10	Of the 16 who supported housing on Area 7A, 11 people said that some housing may provide some accessible public space.
Q11	Of the 39 (7.6%) who said that they want a hospital on Area 5C, 31 also said they did not want housing there.
Q12	This question gave various choices of reasons for not building on Area 7A. In decreasing % order the most popular were; 90.1% said Local roads do not cope well with current traffic, cannot cope with more, and no possibility of road widening. 86.5% Land is Green Belt. 85.2% Schools and GP surgeries could not cope. 84.8% Holyport Conservation Area would be spoilt. 81.7% concerned that it would close a gap that gives the area a feel of separation from Maidenhead.
Q13	This question gave various choices of reasons for not building on Area 5C. In decreasing % order the most popular were; 79.7% Land is Green Belt. 79.5% said Local roads do not cope well with current traffic, cannot cope with more, and no possibility of road widening. 77% Schools and GP surgeries could not cope. 69.4% Area has zones of high pollution; more cars would make this worse.
Q14	This question gave various choices for other uses for Area 7A. In decreasing order, the most popular were; 63.7% Farming

Andrew Cormie's comments on RBWM's December 2016 Draft Local Plan

	<p>52.8% Nature Reserve</p> <p>50.5% Public Open Space.</p> <p>37.8% Leave as undeveloped Green Belt</p> <p>28.8% Leisure Pursuits / Playing Fields</p> <p>24.2% Allotments</p>
Q15	<p>This question gave various choices for other uses for Area 5C. In decreasing order, the most popular were;</p> <p>54.2% Nature Reserve</p> <p>53.2% Farming</p> <p>36.1% Leave as undeveloped Green Belt</p> <p>29.4% Allotments</p> <p>29.3% Public Open Space.</p> <p>26.9% Leisure Pursuits / Playing Fields</p>
Q16	<p>As RBWM's Consultation Question 20 asks residents to say which areas they would like to have developed, even though residents not living in an area can vote for development in that area, HRA have highlighted that we consider this to be bad practice, and therefore the results of RBWM's consultation question 20 cannot be relied on by RBWM. We asked Holyport residents how they would answer. This question was only asked in the online survey (226 respondents)</p> <p>77.4% said they would not vote for any areas to be developed.</p> <p>16.4% said they would vote for areas other than 7A or 5C</p> <p>5.8 % said they would vote for development on Area 5C</p> <p>0.4% said they would vote for development on Area 7A</p>
Q17	<p>RBWM's Question 21 asks whether residents would prefer housing or a Hospital in Area 5C, but does not give the option of having neither. HRA again thinks that this is bad practice and therefore the results of Question 21 cannot be used by RBWM. HRA gave the three options;</p> <p>88.3% said leave it as Green Belt</p> <p>11.9 % said Hospital.</p> <p>2.3% said houses.</p>

From the survey results it is clear that HRA's primary duty in representing the views of Holyport residents has to be to argue against any development on Areas 7A and 5C.

A very small percentage of respondents are willing to have some houses in exchange for public land.

Although true that a small percentage of those responding are in favour of a hospital on Area 5C, the HRA has concern that due to lack of information from RBWM, people wishing to have a hospital do not appreciate how much traffic disruption would result from this.

We therefore consider that the RBWM was wrong to ask the question as to whether or not people would like a hospital on Area 5C without having first published forecasts of the traffic increases that would result should such

a hospital be built. Neither did RBWM do anything to make known the likely difficulties faced by patients, or by hospital staff in emergency situations, when the traffic is in its peak periods.

We consider that all results from question 21 should be scrapped, as answers in favour of a hospital have been given without publication of RBWM due consideration, assessment and advice as to the consequences of a hospital on Area 5C

A further concern is that Area 5C, having been a quarry in the late 60s and early 70s and having had gravel removed down to depths of over 8m, was then restored to a lower level than the original, using builders skip waste capped with soil.

Builders skip waste could have been anything from wood, plastic, soil, paper, paint cans, brick rubble etc and as old asbestos was being actively removed from anywhere that it was installed it seems likely that asbestos may also be present.

So, if development of houses or hospital were ever to be agreed for this site, it would require the removal of the waste and importation of suitable hardcore, and/or major piling work.

These concerning factors about traffic and the state of the land in Area 5C should be explained to the public before asking them whether or not a hospital should be built on Area 5C.

Regarding the information about Area 5C (HA9) having been filled with builders skip waste etc, the information about that has (in 2016) been questioned by two Bray Parish Councillors who have advised that they can find no evidence of the area having been used to extract gravel, and have several local residents who do not remember any such work. But I have a source who says that it did happen, so I recommend that RBWM search records from the time of the M4 Motorway construction.

My comments on various paragraphs and policies in the 2016 / 17 Draft Local Plan follow. I have no comments on Local Plan paragraphs not shown below;

Draft Local Plan (2016) Paragraph	Andrew Cormie Comments
Foreword by Leader of the Council and the Lead Member for Planning We are delighted to introduce this further consultation draft of the Borough Local Plan for the Royal Borough of Windsor and Maidenhead. The Borough Local Plan promotes a sustainable pattern of development for the Borough over the plan period until 2033. The new development that is proposed in this plan aims to provide for new housing and affordable housing to fulfil the needs of all of our residents, whilst at the same time protecting our valued natural and built historic environment and assets. We are privileged to be home to one of the most recognisable and valued historic assets in the country, Windsor Castle and the Windsor Great Park.	<p>The consultation process is only available with great difficulty to those without internet access.</p> <p>A six week consultation over the Christmas and New Year period is insufficient. The process of reviewing and commenting on-line is a bad experience, not likely to encourage comments.</p>

<p>The plan aims to protect and enhance those elements that make our Borough special in the eyes of not only our residents but all those who choose to visit, work and invest in the Royal Borough of Windsor and Maidenhead.</p> <p>The Borough Local Plan is based on a substantial and robust evidence base and on the results of the consultation exercises we have carried out in the past, as guided by national policy and legislation. Representations you make at this stage will inform the next stage of the Borough Local Plan which will be submitted to the Secretary of State for Examination in Public by a Planning Inspector. We urge you to submit any comments you may have relating on the content of this draft Local Plan.</p> <p>Cllr Simon Dudley, Leader of the Council and Cllr Derek Wilson, Lead Member for Planning</p>	<p>Some sites shown in this latest plan were not previously considered in the Edge of Settlement Analysis of 2014. I question the evidence base.</p> <p>I note also that the plan now indicates for many sites more houses than RBWM previously indicated.</p> <p>For instance HA6 has been increased by 500 dwellings from 1500 to 2000. This with no explanation.</p>
<p>1.2.1 Planning legislation requires that the presumption in favour of sustainable development should be seen as a golden thread running through both the Borough Local Plan (BLP) and decision making processes. In particular the BLP should be seeking positively to meet the development needs of the Borough, encourage sustainable growth and development, and maintain and enhance the natural and built environments.</p>	<p>Planning Legislation has many contradictory statements and also requires that Green Belt Land be protected. See e.g. http://planningguidance.communities.gov.uk/blog/policy/achieving-sustainable-development/delivering-sustainable-development/9-protecting-green-belt-land/</p>
<p>1.5 Neighbourhood Plans</p> <p>1.5.1 A Neighbourhood Plan is a community-led development framework, which in combination with a Local Plan will help guide the future development of an area. Neighbourhood planning offers a formal opportunity to add real value to the planning process by setting out community aspirations.</p>	<p>Wherever "Neighbourhood Plan" is mentioned RBWM should, in common with many other Local Authorities, use the proper legal title "Neighbourhood Development Plan (NDP)". Please use that phrase throughout the Local Plan document.</p> <p>It is clear that Neighbourhood Development Plans have been invented to encourage more development - as an NDP is allowed to promote MORE DEVELOPMENT than that indicated in a Borough Local Plan, but is prohibited from specifying</p>

	less development.
<p>3.6 Climate change Flooding</p> <p>3.6.1 The most pressing implication of climate change is likely to be flooding as a result of increased rainfall and hard surfaces due to construction in the future. Just over 27% of the Borough is located within Environment Agency Floodzone 2 (1:100 – 1:1000 year risk of flooding), and 20.3 % within Floodzone 3 (1:100 year risk of flooding) and managing new development not to put new and existing residents at increased exposure to flooding is essential. The Strategic Flood Risk Assessment suggests that there will not be a marked increase in the extent of flooding, so only a few areas that are currently situated outside Floodzone 3 (high probability) will be at risk of flooding in future years.</p> <p>3.6.2 Research in other areas suggests that the future 1:100 year floodzone could extend to the current 1:1000 year floodzone and it is important to take into consideration that property and areas currently at risk of flooding may be more susceptible to more frequent and severe flooding in future years. Climate change could also potentially increase the frequency and intensity of localised storms over the Borough, exacerbating localised drainage problems which may be exacerbated by the use of non-porous materials in construction.</p>	<p>3.6.1 Good to see recognition of the problems that will arise due to building on floodplain.</p> <p>Yet this Local Plan does advocate building on floodplain, for instance area HA18. See; http://maps.environment-agency.gov.uk/wiyby/wiybyController?value=SL6+2HA&submit.x=11&submit.y=7&lang=_e&ep=map&topic=floodmap&layerGroups=default&scale=9&textonly=off</p> <p>and here; http://maps.environment-agency.gov.uk/wiyby/wiybyController?value=SL6+2HA&submit.x=13&submit.y=13&lang=_e&ep=map&topic=fwa&layerGroups=default&scale=9&textonly=off</p> <p>3.6.2 Good to see recognition that the extent of flooding in the future is likely to be greater and more frequent.</p> <p>Yet this Local Plan advocates building on the floodplain.</p>
<p>Sustainable transport</p> <p>3.6.6 The Borough has high car usage and ownership, partially due to the rural nature of some settlements where regular public transport services are not viable, and also as a result of the area being relatively affluent. Car ownership was 86.7% at the 2011 Census, which has increased since the 2001 Census when it was 85.7%. The population is therefore very mobile, increasing the amount of commuting and social journeys undertaken.</p> <p>3.6.7 The Borough has five Air Quality Management Areas (AQMAs) to monitor and seek to improve air quality in urban areas that experience high levels of traffic pollution. These are Maidenhead town centre, Royal Windsor Way in Windsor, Bray/M4 /A308, and St Leonards/Imperial Road junction, Windsor.</p>	<p>Development of the Green Belt Areas proposed HA6, HA7, HA8, HA9, HA11, HA18, and HA23 will increase further the amount of vehicles on roads in the RBWM area, particularly roads leading to and from the Braywick Roundabout.</p> <p>The Borough should examine other areas where air quality may be increasingly bad, and consider the likely adverse effects of more</p>

	development
<p>4.2.3 Development will be expected to promote sustainability and add to the special qualities of the Borough through high quality design, effective and efficient use of land and protection for those valued heritage, natural and other assets. Development will aim to protect the open countryside from unnecessary development and promote the inclusion of open and green space wherever possible. Particular consideration will be given to flooding and traffic implications arising from development with regard paid to the capacity of existing infrastructure.</p> <p>4.2.4 Additional infrastructure including education, healthcare, highways, social infrastructure and telecommunications will be provided alongside development to ensure that people, goods and communications can freely connect and travel across the Borough. Transport infrastructure in particular will be maintained to ensure that interdependencies between places within the Borough and outside are maintained.</p> <p>4.2.5 Development will be located sustainably within and around the urban area of Maidenhead as the major service centre of the Borough. Sustainable development will also be focused in and around Windsor and other centres that already provide services.</p> <p>4.2.6 The wider Thames Valley region will continue to be a focus for economic development with Maidenhead playing a vital role. Maidenhead Town Centre will continue its programme of regeneration to enable the town to continue to provide a focus for economic development and employment and together with Windsor and Ascot will continue to meet the aspirations of residents at the heart of the community. Windsor and Eton will continue to be promoted and enhanced as thriving visitor destinations for both the domestic and international tourist market.</p> <p>4.2.7 The Borough will continue to prosper and provide a good range of jobs and homes for all of our residents close to where people choose to live with Maidenhead as a particular focus for sustainable residential development. Smaller villages and settlements within the Green Belt will be protected from pressure arising from additional housing development whilst still allowing for an appropriate level of growth supported by suitable infrastructure. The Borough will continue to provide an excellent education through</p>	<p>This is incompatible with the intention to develop Greenbelt Areas HA6, HA7, HA8, HA9, HA11, HA18, and HA23.</p> <p>Mention of consideration of traffic implications in the same sentence as advocating development on Green Belt is contradictory.</p> <p>Our roads are already overloaded without adding more traffic.</p> <p>Development of Green Belt areas HA6, HA7, HA8, and HA9 will join Maidenhead to Holyport. This is counter to four of the five purposes of the NPPF i.e;</p> <ol style="list-style-type: none"> 1. To check the unrestricted sprawl of large built-up areas; 2. To prevent neighbouring towns merging into one another; 3. To assist in safeguarding the countryside from encroachment; 4. To preserve the setting and special character of history towns;

<p>our schools and colleges relevant to the needs of our existing business community whilst also helping to attract and retain new business opportunities.</p> <p>4.2.8 The Green Belt will be protected to ensure that the setting of our towns and villages remain protected from inappropriate development. Access to the countryside will be promoted to take advantage of the benefits offered by the rural setting of the Borough</p>	<p>4.2.7 and 4.2.8 are incompatible with the intention to develop Greenbelt Areas HA6, HA7, HA8, HA9, HA11, HA18, and HA23.</p>
<p>4.3 Objective 1 Special qualities</p> <p>To conserve and enhance the special qualities of the Borough's built and natural environments:</p> <ul style="list-style-type: none"> i. Protect the openness of the Green Belt. ii. Retain the character of existing settlements through guiding development to appropriate locations and ensuring high quality design of new development. iii. Protect the special qualities of the built environment including heritage assets. iv. Protect and enhance biodiversity within the Borough. 	<p>Building on Green Belt Areas HA6, HA7, HA8, HA9, HA11, HA18, and HA23, neither protects the openness of the Green Belt, nor guides development to appropriate locations.</p>
<p>4.3 Objective 9 Environmental protection</p> <p>To maintain and enhance the natural environment of the Borough:</p> <ul style="list-style-type: none"> i. Ensure that new development contributes to environmental improvement ii. Protect designated areas and features. 	<p>Building on Green Belt Areas HA6, HA7, HA8, HA9, HA11, HA18, and HA23, does not enhance the natural environment.</p>
<p>4.3 Objective 11 Climate change and biodiversity</p> <p>To ensure that new development takes account of the need to mitigate the impacts of climate change and on biodiversity:</p> <ul style="list-style-type: none"> i. Promote sustainable design and construction. ii. Promote the use of renewable energy. iii. Manage flood risk through the location and design of development. 	<p>Building on Green Belt Areas HA6, HA7, HA8, HA9, HA11, HA18, and HA23, does not mitigate climate change or help biodiversity.</p>
<p>5.5.4 Option A would see development densities increase across the existing built up areas of the Borough. Maidenhead and to a lesser extent Windsor would be expected to absorb most new development, supporting their role as the most sustainable settlements, their importance as business locations and the availability of land. Other settlements outside the Green Belt would be expected to accommodate new development and there would be taller buildings in town centres and other specific locations. This</p>	<p>There is a lack of clarity due to the use of letters A, B, C and numbers 1, 2 3 for the same options.</p> <p>I disagree with the choice of Option 3 and Option C as stated in 5.5.11.</p> <p>I agree only with Option A and Option 1.</p>

<p>option would result in no or minimal loss of Green Belt.</p> <p>5.5.5 Option B would entail moderate increases in residential density. Again Maidenhead and to a lesser extent Windsor would absorb most new development with other settlements outside the Green Belt accommodating new development. Some land around the edge of settlements would be required to provide development and delivery would be through small sites with limited impact on infrastructure and the appearance of the area, with some loss of Green Belt.</p> <p>5.5.6 Option C would result in lower residential densities across the Borough with a greater amount of greenfield land around the edges of settlements, resulting in a greater loss of Green Belt than other options.</p> <p>5.5.7 The 2014 Preferred Options consultation set out another series of three options that responded to the strongly expressed public support for the Green Belt as a result of the 2009 consultation. The Green Belt may regarded as the primary determining factor in the potential site allocation.</p> <p>Option1: To restrict building to the capacity of existing built up areas, avoiding building in the Green Belt</p> <p>5.5.8 This option places an emphasis on environmental protection, specifically the Green Belt, over social and economic consequences. Protecting the current precise extent of the Green Belt would restrict building capacity and significantly fewer houses would be built than are projected to be needed.</p> <p>Option 2: To permit building to a level that meets the projected population and economic development needs, recognising that this would require some building in the Green Belt.</p> <p>5.5.9 This option places an emphasis on social and economic needs over environmental impacts and would require significant building in the Green Belt.</p> <p>Option 3: To permit building to a level that strikes a balance between meeting the projected population and economic development needs and the environmental impacts, including some building in the Green Belt.</p> <p>5.5.10 This option seeks a balance between social and economic needs with environmental impacts and would mean some limited use of existing Green Belt.</p> <p>5.5.11 Based on careful consideration of the three strategic options, including taking into account the results of consultation with the wider community, Option 3 was considered to be the most</p>	<p>See Planning Legislation that also requires that Green belt Land be protected.</p> <p>http://planningguidance.communities.gov.uk/blog/policy/achieving-sustainable-development/delivering-sustainable-development/9-protecting-green-belt-land/</p> <p>90% of those Holyport Area Residents who responded to a survey in 2014 wanted areas of Green Belt local to Holyport to remain as Green Belt – one of these areas is the area now defined in the 2016 Local Plan as Area HA9. I have no doubt that presently these same residents have the same view as in 2014. This view is reflected in Local Plan paragraph 5.5.7 .</p> <p>Re 5.5.11, Who considered that Option 3 was the most appropriate? Has the decision expressed in 5.5.11 been debated by all Councillors? The majority of RBWM Councillors, and all of the Bray Ward Councillors being Conservative, I point out that the Conservative Manifesto used in RBWM 2015 election gave on page 8 an unequivocal promise to PROTECT THE GREEN BELT. On earlier pages they claim how they had previously delivered every one of their commitments and on page 5 "WE AIM TO REPEAT OUR COMMITMENT</p>
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appropriate, seeking a balance between social and economic needs and environmental impacts whilst at the same time seeking to meet the expectations of national policy and reflecting the need for all authorities to do more to increase housing supply.	TO DO AS WE PROMISE". I trust that Bray Ward Councillors will not agree to development on at least Green Belt areas HA6, HA7, HA8, and HA9.
5.7.2 A SA/SEA was carried out on the BLP Preferred Options 2014 which identified Option 3 as the preferred strategic policy option that sought a balance between social and economic needs while protecting the quality of the environment. Similarly, a SA/SEA has been carried out on the present draft BLP including a HRA and supports the process of assessment described below.	Same comments as for 5.5.4 to 5.5.11
5.8.1 The selection of sites to be incorporated into policies for housing, economic development, and infrastructure provision is a primary function of the draft BLP. Following from a spatial strategy which promotes sustainable development, the strengthening of existing settlements and some release of existing Green Belt sites while protecting the high quality built and natural environments of the Borough, it is necessary to identify sites which are suitable for development within the plan period (2013-2033).	I and the 90% of responding Holyport Area Residents who voted against building in Green Belt objected to the proposed release from Green Belt of Area HA9.
<p>Policy SP 1 Spatial Strategy for the Royal Borough of Windsor and Maidenhead</p> <p>1. The Borough Local Plan will provide for 14,298 new dwellings and seek to enable up to 43,320 square metres of employment floor space and up to 9,550 square metres of additional retail floor space in the plan period up to 2033.</p> <p>2. Development will be focused primarily on the urban area of Maidenhead, and the strategy recognises the national and international significance of Windsor as a significant town centre in the Borough.</p> <p>Proposed development in Ascot with its special characteristics and further retail and employment development will be directed to district and village centres.</p> <p>3. New housing and economic development will be directed in the first instance to the following strategic locations as identified on the Policies Map:</p> <p>a. Strategic locations for development:</p> <p>b. Maidenhead town centre</p> <p>c. Ascot town centre</p> <p>d. Maidenhead golf course and associated sites</p>	<p>I and the 90% of Holyport Area Residents who voted against building in Green Belt did not agree to the change of Green Belt status proposed for the following;</p> <p>e. The Triangle (Land bounded by M4, A308(M), A330) (Area HA9) either for housing or for industrial and warehousing floor space</p> <p>or</p> <p>f. Land west of Windsor, north and south of A308 (Area HA11)</p> <p>or</p> <p>land to the south of the golf course (Land south of Harvest Hill Road, Maidenhead; Land south of Manor Lane) (Area HA7)</p> <p>For (e) The Holyport Residents</p>

<p>e. The Triangle (Land bounded by M4, A308(M), A330)</p> <p>f. Land west of Windsor, north and south of A308</p> <p>8. Maidenhead Golf Course and land to the south of the golf course (Land south of Harvest Hill Road, Maidenhead; Land south of Manor Lane) as defined on the Policies Map will accommodate 2,000 housing units and associated infrastructure.</p> <p>9. Land south of A308, north of the M4, and west of Ascot Road (Triangle site) may accommodate housing, industrial and warehousing floor-space.</p> <p>10. The Green Belt will be protected from inappropriate development in line with the guidance contained in ministerial statements, legislation and policy, and those sites proposed for development which are presently designated as Green Belt are identified in Policies HO1 and ED2 and are supported by evidence which justifies their inclusion as appropriate for development.</p>	<p>survey rejected any change from Green Belt of "The Triangle" (Area HA9)</p> <p>For (f) Holyport Parish Council's Neighbourhood Development Plan (NDP) is against any change of Green Belt status in the NDP's defined "Green Gap" in which these areas are situated. (Area HA11)</p> <p>I do not agree that the evidence presented justifies loss of Green Belt. RBWM are stewards for the area in which we live for future generations. Once Green Belt is lost it is gone forever.</p>
<p>5.10.3 The Localism Act 2011 promotes community-led proposals which are driven by local residents, rather than the Council or commercial interests. The Borough wishes to encourage residents to engage directly in the planning of their communities and will support in principle community-led proposals which meet an identified need and have the agreement of the local community. The preferred method of this engagement will be through Neighbourhood Plans.</p> <p>5.10.4 A Neighbourhood Plan is a community-led framework for guiding the future development, regeneration and conservation of an area and may not be used to constrain the delivery of development inappropriately. The Borough is committed to enabling and assisting neighbourhood planning and recognises that, as part of this, proposals may emerge that have strong community support but are outside the scope of this plan.</p> <p>5.10.5 Community-led proposals may be delivered on land where development is not normally permitted, for example a community facility on an employment site. In certain circumstances it may be appropriate for a small element of open market development to be provided as part of community-led schemes. Where proposed, the need for the open market development must be demonstrated through financial appraisals which show that the scheme would</p>	<p>These paragraphs describe the situation currently applicable, highlighting that a <u>Neighbourhood Development Plan</u> may promote MORE development than a Borough Local Plan but NEVER LESS development.</p> <p>It is not part of the "duty" of a Local Plan to describe how a NDP can promote more development than can the Local Plan.</p> <p>The concept of a Local Plan is that it should define what the Borough as a whole wants, not show how others can contravene it by increasing development.</p>

otherwise not be viable.	
<p>5.11 Policy SP2 Community Led Development Policy SP 2 Community Led Development</p> <p>1. Community led development proposals will be supported where:</p> <p>a. proposals are in general conformity with the strategic policies of the Borough Local Plan set out elsewhere in this document, and accords with the other policies contained in the Plan</p> <p>b. proposals for development are contained in a made Neighbourhood Plan that has been subject to public consultation in line with the Neighbourhood Planning Regulations and can therefore demonstrate clear community support.</p> <p>2. Proposals for affordable housing in Neighbourhood Plans may be supported in suitable Green Belt locations as an exception to normal policies of control provided that sufficient justification for such an exception has been provided. This should include how the scale of the scheme and range of dwelling sizes, types and tenures is appropriate to the location and level of identified local affordable housing need, and it can be demonstrated that the scheme will be well managed and financially viable over the long term and that any benefits provided by the scheme can be retained by the local community in perpetuity;</p> <p>3. Elements of open market development delivered as part of a community led development scheme will be considered acceptable where:</p> <p>a. it can be demonstrated through a financial appraisal that it is essential to enable the delivery of community benefit</p> <p>b. it can be demonstrated that the community benefit (such as, but not exclusively affordable housing or open space) is greater than would be delivered on an equivalent open market site.</p>	<p>This Policy SP2 describes the situation currently applicable, highlighting that a <u>Neighbourhood Development Plan</u> may promote MORE development than a Borough Local Plan but NEVER LESS development.</p> <p>I consider that the reliance on the words “affordable housing” is not sustainable - as supposing a house is built and sold at an “Affordable” price, there is no way of preventing its being sold on later at a higher price, upon which we would then need more affordable housing.</p> <p>Central Government has been wrong in promoting the sale of Council rented housing without these being replaced and is continuing this bad policy by insisting on the sale of Housing Association homes.</p> <p>There is a clear need for housing to be built and owned by the Local Authority and rented out by them. Such housing would be “affordable housing”. I note the 15/12/16 report about RBWM Property Company Ltd., but it seems to me that this is categorised as a Housing Association – and we know that Government intends to oblige Housing Associations to sell their houses to tenants.</p>
<p>6.1.1 A key objective of planning is to maintain and where possible enhance the quality of a place. This quality is not only about how an area looks, but also about how it feels and is used. The quality of an area is important to the social, economic and environmental vitality</p>	<p>Area HA9 will not be enhanced by building on it either houses or industrial and warehousing premises. Amongst other things the extra traffic</p>

of its community, and is often important beyond the immediate vicinity. These factors make it important to ensure that the qualities of our towns, villages, hamlets, spaces, and countryside are maintained and enhanced, and that new development contributes to these values.	arising will be detrimental to "the qualities of our towns, villages, hamlets, spaces, and countryside".
6.2.6 The relationship with neighbouring properties should be considered to avoid conflict through proposals that are overbearing, reduce privacy or may harm outlook or light levels. Imaginative layouts can help reduce the impact of a scheme on neighbours and can create high quality spaces that are both pleasant and functional. Incorporating basic principles included in Secured by Design, such as ensuring that private and public spaces are clearly defined and that pedestrian routes do not become isolated, will assist in making spaces feel safe.	One area proposed to be used for housing is Tectonic Place (HA17). The area shown bounded by a red line in the plan on page 193 is not the full area owned by the prospective builder. The builder owns more land, having bought from adjacent householders. A figure of 25 houses is quoted in the Local Plan. How can we be assured that the final number will be 25, and that the relationship as expressed in 6.2.6 will apply?
6.2.7 Access to, through and around a scheme should be carefully thought through so that users will feel safe and will not face any unnecessary impediment. New road layouts should prioritise safe, easy and direct pedestrian movement. Good permeability should be delivered and opportunities to enhance accessibility around the community should be secured, particularly where key routes to locations such as schools or retail centres can be provided. Generally gated developments will not be encouraged.	One area proposed to be used for housing is Tectonic Place (HA17). Access to this area could be from Holyport Road and or Hendons Way. Which way will be chosen? Or will there be through access from both roads? Bearing in mind the extra congestion that would result on Stompits Road and Stroud Farm Road and the school if there is access from Hendons Way, will RBWM ensure access only from Holyport Road - with a new roundabout put in place there?
6.3 Policy SP3 Design Policy SP 3 Design 1. New development should contribute towards achieving high quality design in buildings, spaces and areas. 2. Development proposals will achieve high quality design in buildings, spaces, and connections with the wider community. All development proposals will have regard to the following design	

<p>principles:</p> <p>a. local character and context: respecting and enhancing where possible the local character, to help establish distinctive neighbourhoods; making the most of existing features on and off site to connect to the local area and create interesting places</p> <p>b. views: retaining important local views of historic buildings or features, positive areas of townscape or scenic importance, and making the most of opportunities to improve views where possible and recognising public views of key landmarks such as Windsor Castle, Eton College and the River Thames</p> <p>c. appearance: incorporating interesting frontages and design details, whilst delivering development that will be appropriate for its use and locality in terms of height, scale, bulk, mass, proportions, built form, rhythm, urban grain, layout and materials</p> <p>d. relationships: achieving a satisfactory relationship with neighbouring properties and between neighbouring properties within a proposed scheme; avoiding unacceptable impacts on the privacy, daylight or sunlight, or outlook of neighbouring properties and potential conflict between uses</p> <p>e. movement and access: delivering easy and safe access and movement for cars, pedestrians, cyclists, and service vehicles, maximising opportunities to enhance permeability and encouraging the use of sustainable modes of transport where possible</p> <p>f. legibility: creating a place that is easy to navigate through the provision of clear and convenient routes, using building identity and landmarks and clear intersections.</p> <p>g. public realm: delivering streets, spaces, and other routes which are safe, uncluttered, and that provide a good sense of enclosure and are easily accessible for all, with a clear definition between public and private areas</p> <p>h. parking: delivering adequate levels of parking that is logical, safe and secure for users and not dominating the landscape</p> <p>i. landscaping and amenity: including comprehensive landscaping schemes that are integrated into proposals, adequate levels of amenity space both in terms of visual amenity space and useable private, shared or public spaces, linking development with the surrounding area, adding interest and screening where necessary</p> <p>j. materials: using high quality materials that are suitable for the</p>	<p>Much of this is appropriate to the proposed Tectonic Place (HA17) development. I look forward to seeing these concepts rigidly applied.</p> <p>2(d) is particularly welcomed as it has most definitely not been properly applied in the past.</p> <p>2(e),(f),(g),(h) especially apply to the proposed Tectonic Place development (HA17).</p>
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<p>location and purpose</p> <p>k. interiors: providing internal spaces that are accessible for all users regardless of disabilities, promoting wellness of users through adequate light and space standards. And being capable of adaptation to meet future needs</p> <p>l. community safety: minimising the opportunity for crime and anti-social behaviour through design that creates safe places</p> <p>m. storage: providing adequate, efficient, and secure internal and external storage space, including for recycling waste bins and outdoor equipment, that is integrated into the scheme to minimise visual impact</p> <p>n. sustainability: development should be sustainable in its design, construction and operation.</p> <p>3. Within Maidenhead town centre (as defined on the Policies Map) including the area of the Town Centre Area Action Plan, greater flexibility on building heights will be permitted. Tall buildings will be supported where they demonstrate exceptional high quality design and do not cause unacceptable impacts. Advice provided by Historic England or similar bodies on tall buildings should inform development proposals.</p> <p>4. Developments should be designed in partnership with:</p> <p>a. the Council through the pre-application service</p> <p>b. the local community through Neighbourhood Plan groups and other engagement methods appropriate to the proposals and in line with standards set out in the adopted Statement of Community Involvement</p> <p>c. design panels as appropriate for major schemes, with the cost of the design panel to be borne by the applicant.</p> <p>5. A Borough Design Guide Supplementary Planning Document will be prepared to illustrate further how this policy will be implemented.</p>	<p>4 (b) applies to the proposed Tectonic Place development (HA17)</p>
<p>6.8.2 The spatial strategy for the Borough is to a large extent determined by the extent of the Green Belt, and the towns and villages which are excluded from the Green Belt are regarded as the most sustainable locations for development by virtue of their existing access to services and facilities, and the availability of previously developed land. As well as continuing to restrict development in the Green Belt as set out in national policy, another key way to achieve a sustainable pattern of development is by promoting a strong and</p>	<p>6.8.2 Building on area HA9 is not promotion of a strong and vibrant countryside character.</p> <p>The proposed building on Areas HA6, HA7, HA8 and HA9 will connect Maidenhead to Holyport. This is counter to four of the five purposes of</p>

<p>vibrant countryside character. This approach is consistent with national policy that promotes economic growth in rural areas in order to create jobs and prosperity.</p> <p>6.8.3 National government policy assigns great weight to the protection of the Green Belt, which is regarded as the primary constraint on the location of new development in the Borough. This is supplemented by the results of public consultation during the preparation of the BLP in 2009 and 2014 which overwhelmingly supported protection of the Green Belt.</p> <p>6.8.4 In reviewing the availability of sites for development outside the Green Belt against the objectively assessed needs for housing and economic development as identified in Section 5 above, it is apparent that it is not possible to accommodate all anticipated development needs in the Borough during the plan period without using a limited area of the Green Belt. The most recent 'call for sites' took place in June 2015, and provides the basis for the assessment of suitable land for development throughout the Borough.</p> <p>6.8.5 The Green Belt and Edge of Settlement studies conducted between 2013 and 2016 assessed land on the edge of settlements which are themselves excluded from the Green Belt for development. The purpose of the 2016 Edge of Settlement Study : Part 1 - Green Belt Purpose Assessment is to consider specifically how land currently designated Green Belt performs against the purposes of Green Belt as defined in the NPPF. This assessment therefore builds on the strategic level Green Belt Purpose Analysis (2013) which comprehensively considered all land designated Green Belt within the Borough.</p> <p>6.8.6 In the Green Belt Purpose Analysis (2013) the options of establishing a new settlement and the significant expansion of an existing settlement that would alter the existing settlement hierarchy were both rejected by the Council through the sustainability appraisal process as unreasonable. Having identified those parcels of land in Part 1 which perform least well against the purpose of the Green Belt, further indicators of their suitability were considered in the Edge of Settlement Study: Part 2 - Constraints, Opportunities and Delivery Assessment.</p> <p>6.8.7 The Council examined in detail the scope for parcels of land on the edge of existing settlements to be released from the Green Belt</p>	<p>the NPPF i.e;</p> <ol style="list-style-type: none"> 1. To check the unrestricted sprawl of large built-up areas; 2. To prevent neighbouring towns merging into one another; 3. To assist in safeguarding the countryside from encroachment; 4. To preserve the setting and special character of history towns; <p>6.8.3 As a result of Holyport Area residents' opinions, RBWM agreed in 2015 that the green belt land of area HA9 would remain as Green Belt.</p> <p>6.8.4 It is possible by choosing Option 1 or Option A instead of Option 3</p> <p>6.8.5 to 6.8.7 The public response to the 2014 consultation was accepted by RBWM, and RBWM stated that Area 5C, now known as HA9 would remain as Green Belt. It is not appropriate that RBWM invent new studies in an attempt to "move the goalposts". In our Prime Minister and MP's words "Brexit means Brexit" – in other words – "The people decided, let the people's will prevail". RBWM and Government should recognise this principle for Area HA9, whilst recalling that the Conservative Manifesto used in RBWM 2015 election gave on page 8 an unequivocal promise to PROTECT</p>
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<p>where it is considered that: development could reasonably be fitted into the urban fabric; landowners have indicated that they are willing to promote the site for development; contributions that the proposed sites make to Green Belt purposes are modest; and a range of other planning requirements are satisfied (for example, in terms of flood risk, impacts on wildlife, impacts on landscape and impacts on the historic environment.)</p>	<p>THE GREEN BELT. On earlier pages they claim how they had previously delivered every one of their commitments and on page 5 "WE AIM TO REPEAT OUR COMMITMENT TO DO AS WE PROMISE".</p>
<p>6.8.13 National planning guidance states that new homes should be sustainably located and this will normally be within existing towns and villages. The construction of new dwellings in the Green Belt constitutes inappropriate development and requires very special circumstances to be shown before they can be permitted. Very special circumstances may exist if a new dwelling is required for those engaged in agriculture or forestry where there is both an essential and permanent need for a worker to be housed at their place of work.</p>	<p>6.8.13 The sentence "The construction of new dwellings in the Green Belt constitutes inappropriate development and requires very special circumstances to be shown before they can be permitted." applies to all Green Belt . No special circumstances have been shown for Area HA9.</p>
<p>6.8.20 Any development, including any new access, car parking areas, floodlighting or additional curtilage, should be unobtrusive and will not be acceptable where it would create a significant and essentially urban element in the landscape to the detriment of its Green Belt setting. Consideration will be given as to whether the new facility proposed would lead to the expansion of the existing use to the extent that it would become unacceptable in its location because the noise and other disturbance it would generate, both on site and on the road network leading to the site, would be harmful to the amenity of local residents or people visiting the area for recreation. In these cases permission should not be forthcoming.</p>	<p>6.8.20 applies to e.g. Area HA9. Business premises there will cause such disturbance.</p> <p>For Tectonic Place (HA17) - unless the number of houses is kept low and vehicular access well designed such problems may well arise.</p>
<p>6.9 Policy SP6 Development in the Green Belt Policy SP 6 Development in the Green Belt 1. The Metropolitan Green Belt is defined on the Policies Map and the open and rural character of the Green Belt will generally be maintained and supported to safeguard the Borough from inappropriate development. 2. Boundaries of existing settlements washed over by the Green Belt, (as defined on the Policies Map) will be maintained in order to identify limits to any infilling. The Council will determine whether any local exceptional circumstances exist to warrant any changes to those boundaries.</p>	<p>(1) In light of the RBWM change of mind regarding development of Green Belt Areas, especially Area HA9 it is obviously bad for Green Belt that the word "generally" is used here.</p>

<p>Residential</p> <p>3. New residential development in the Green Belt will only be permitted where:</p> <p>a. the development proposal would be entirely contained within the boundary of a settlement or constitutes limited infilling within the boundaries of a village as defined on the Policies Map</p> <p>b. Proposals for new dwellings associated with agriculture or forestry will normally be acceptable where:</p> <p>i. there is both an essential and permanent need for the new dwelling based on the functional requirements of the enterprise it is intended to serve;</p> <p>ii. the new dwelling is suitably located for the purpose for which it is intended;</p> <p>iii. there is no other suitable accommodation available in nearby settlements, no available existing dwelling on the holding and no suitable existing building on the holding available for conversion to residential use that would meet the demonstrated need;</p> <p>iv. it can be clearly shown that residential accommodation is required to establish an agricultural or forestry business in the green belt.</p> <p>c. where there would be no other justification for such accommodation, consideration will be given only to the grant of planning permission for the siting of a mobile home or other suitable form of temporary accommodation for a maximum of three years. If at the end of this period viability cannot be demonstrated the temporary accommodation would be expected to be removed and the site restored, unless there is clear evidence that a permanent need will be established within a period to be agreed with the local authority;</p> <p>d. a satisfactory mechanism will be put in place to secure the long term control of the dwelling by the business and of any other dwelling that meets the need of the business. Occupancy of the dwelling in question (and of any other dwelling that meets the need of the business) will be restricted to persons solely, mainly or last working in agriculture or in forestry. In all cases the history of the enterprise will be scrutinised and where fragmentation has occurred to sever land from agricultural dwellings or from buildings that could have been converted to residential use a new dwelling will not</p>	<p>3 (c) It is no use to write this in the way done here "If at the end of this period viability cannot be demonstrated the temporary accommodation would be expected to be removed and the site restored, unless there is clear evidence that a permanent need will be established within a period to be agreed with the local authority;"</p> <p>The words "would be expected" need to be replaced with "is to be"</p>
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<p>normally be permitted.</p> <p>e. any proposals for a new dwelling deemed disproportionate in scale to the enterprise it is intended to serve or inappropriately sited or designed in terms of impact, including the treatment of land around it, will not be acceptable. Consideration will be given to the removal of permitted development rights for the extension of any dwelling so approved where it is felt that extension could risk rendering the dwelling disproportionate to the holding and so unlikely to remain available for future occupation by an agricultural worker.</p> <p>f. the development proposal relates to the rebuilding or one-for-one replacement of an existing habitable dwelling of permanent construction where the residential use is not seasonal or occasional and which has not been abandoned and which will not have a materially greater impact than the original building</p> <p>g. the development proposal relates to affordable housing on rural exception sites</p> <p>h. the development proposal relates to affordable housing on rural exception sites through a community led proposal identified in a made Neighbourhood Plan</p> <p>Non-residential</p> <p>4. Development proposals for the reuse or replacement of non residential buildings in the Green Belt will only be permitted where:</p> <p>a. an existing lawful building remains that is substantially complete</p> <p>b. the building is of permanent and substantial construction and its form is in keeping with its surroundings and would not require extensive reconstruction or a material change in size or scale</p> <p>c. the proposed use would not have a materially greater impact than the present or last approved lawful use on the openness of the Green Belt and the purposes of including land in it</p> <p>d. the reuse of a building for business and industrial uses should be appropriate in size and viability to agricultural units or buildings on the farm. Appropriateness should be tested against the context of the locality as justified in a farm management plan.</p> <p>5. In the Green Belt proposals for new buildings or structures associated with outdoor sport, outdoor recreation or cemeteries will normally be acceptable provided that;</p> <p>a. the scale of the building is no more than is genuinely required for the proper functioning of the enterprise or the use of the land to</p>	<p>3(h) Earlier comments on "affordable housing and Neighbourhood Development Plans apply.</p>
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<p>which it is associated;</p> <p>b. the building is unobtrusively located and designed so as not to introduce a prominent urban element into a countryside location, including the impact of any new or improved access and car parking areas;</p> <p>c. there is no detrimental effect on landscape quality, residential amenity or highway safety.</p>	
<p>6.10.3 Whilst striving for greater versatility in the rural area, the BLP seeks to ensure that proposals for development in the countryside are appropriate to their location, small in scale and do not detract from the character of the area. Care should also be taken over the scale, siting, design and materials employed in any new buildings so as to limit the impact on the character of the countryside.</p>	<p>Building on Area HA9 contravenes this statement.</p>
<p>6.11 Policy SP7 Countryside Character Policy SP 7 Countryside Character</p> <p>1. Development proposals in the countryside will need to respect its character. Development proposals for infrastructure in the countryside will be permitted where it can be demonstrated that there are very special circumstances which outweigh any harm to the Green Belt. Communities within the Borough will be encouraged to identify important characteristics of their rural places and to develop suitable approaches to support the countryside through Neighbourhood Plans and or Village Design Statements.</p> <p>2. Development proposals will be permitted where very special circumstances can be demonstrated that take into account the following principles:</p> <p>a. development located where it would be viewed against existing built form and sited adjacent to existing settlements, making the best use of existing community infrastructure</p> <p>b. the scale of proposed development should be appropriate to its location</p> <p>c. design and layout should respect the character and appearance of the countryside and landscape setting</p> <p>d. development proposals should not lead to a level of activity including traffic which is incompatible with the rural character of the area</p> <p>e. the best and most versatile agricultural land and woodland is protected from development.</p>	<p>If Area HA9 is developed then almost all of the requirements of paragraphs 1 and 2 of this policy will be contravened.</p>

<p>3. Development proposals for the following types of development will be permitted, subject to the requirements of policy regarding the Green Belt:</p> <ul style="list-style-type: none"> a. development for agriculture b. the re-use or replacement of non-residential buildings c. rural tourism and leisure development that benefits businesses, communities and visitors in rural areas d. limited infilling in village, and limited affordable housing for local community needs e. limited infilling or the partial or complete redevelopment of previously developed sites. 	
<p>7.1.3 The Council has determined that to meet the level of need for housing in the Borough there will need to be a limited amount of development and redevelopment on land presently designated as Green Belt. Strategic locations have been identified in 5.9 'Policy SP1 Spatial Strategy' and further sites are identified in spatial policies for housing, economic development, retail and other uses and activities.</p>	<p>"The council has determined..." Have all of the Conservative RBWM Councillors considered this and agreed it despite their manifesto commitments?</p>
<p>7.2.2 The spatial strategy proposes the provision of 14,298 new homes within the Borough in strategic locations as identified in 5.9 'Policy SP1 Spatial Strategy', sites in existing settlements, previously developed sites in the Green Belt, and a limited number of sites which will be released from the Green Belt due to the exceptional circumstances identified by this Local Plan. The spatial strategy pursues with vigour the more intensive use of urban land, particularly in town centre locations.</p>	<p>I am not convinced that a sufficiently robust consideration of the need for these houses and the ability or justification for RBWM to have to create them has been carried out. Further, the Maidenhead Advertiser of 1st December 2016 highlighted that a large number of unused houses exist within the RBWM area. We see a policy of Local Authorities being forced to release Green Belt land for builders to build houses to profit from them, whilst there are empty houses.</p>
<p>7.5.1 The Borough seeks to deliver a wide variety of high quality homes that will provide all tenures, types and sizes of housing to meet the needs and demands of different people in the community. This will include housing for older people, people with disabilities, the travelling community, students and others in the community with specialist housing needs. The provision of new dwellings will take account of local need to allow for a genuine choice of housing</p>	<p>Does this include housing to be rented from RBWM?</p>

<p>options and the creation of sustainable, balanced and mixed communities.</p>	
<p>7.6 Policy HO2 Meeting Housing Need Policy HO 2 Meeting Housing Need</p> <p>1. The provision of new homes should contribute to meeting the needs of current and projected households by having regard to the following principles:</p> <ul style="list-style-type: none"> a. provide an appropriate mix of dwelling types and sizes b. be adaptable to changing life circumstances c. for proposals of 20 or more dwellings, at least 5% of dwellings should be delivered as fully wheelchair accessible. <p>2. Development proposals for residential care will be only be permitted where they meet local commissioning priorities or a demonstrable local community need has been established.</p> <p>3. Development proposals should demonstrate that housing type and mix have been taken into account and show how they seek to demonstrate how dwellings have been designed to be adaptable.</p> <p>4. Development proposals should not result in a net loss of existing dwellings or land that provides for residential uses unless such a loss is justified by specific circumstances. The Council will only support development proposals that would result in the net loss of residential accommodation where one or more of the following criteria are met:</p> <ul style="list-style-type: none"> a. retention of the residential use would be undesirable due to proven environmental constraints b. the development proposal would provide an essential community service or another form of residential accommodation; <p>5. Development proposals that would result in the partial loss of an existing unit of residential accommodation to non residential use will only be permitted where one or more of the following criteria are met:</p> <ul style="list-style-type: none"> a. the nature and intensity of the non residential use would not detract from the occupation of the retained residential accommodation, or b. the retained residential accommodation would be of a satisfactory standard including living space and residential amenity. 	<p>Will any of these homes be rented from RBWM?</p>
<p>7.7 Affordable housing 7.7.1 The Borough is considered to be one of the most prosperous</p>	<p>The whole concept of "Affordable Housing" is flawed as once the house</p>

<p>areas in the country with very high house prices and lack of supply, particularly with regard to affordable housing. The Borough enjoys a close proximity to London with excellent transport links, a great number of employment and leisure opportunities and a vibrant local economy, and this serves to increase demand for housing which in turn leads to increased house prices.</p> <p>7.7.2 Affordability is a measure of whether housing can be afforded by certain groups of households and is defined by the relationship between local incomes and the local general housing market. Therefore, the ability of a household to satisfy its own housing requirement is fundamentally a factor of the relationship between local house prices and household income.</p> <p>7.7.3 The high cost of home ownership in the Borough has always presented an issue of affordability for many of the Borough's residents and leaves many people unable to afford market housing. In addition the high cost of renting on the open market leaves many local people unable to afford this tenure without dependency on benefits. This increases the demand for the provision of affordable housing. The current SHMA shows that there is a need for an additional 434 new affordable homes in the Borough every year.</p> <p>7.7.4 Affordability is a major concern to those on the lowest earnings, who are generally first time buyers. The Borough's affordability ratio of median house price to salary is 13.45 (CLG, 2015) which means that house cost, on average, over thirteen times the average salary. Due to the high price of housing many lower paid and lower skilled jobs are filled by people who cannot afford to live in the Borough and this has led to an increase in commuting.</p> <p>7.7.5 The Council has a corporate policy to encourage affordable housing, including key worker housing. The Council seeks to encourage more residents to invest in securing their own housing in the Borough and thus the provision of a broader range of affordable housing products to meet the demand across the whole of the local housing market.</p>	<p>has been bought there is no restriction on its sale at a higher "Non-Affordable" price.</p> <p>Hence having assisted builders to profit from the building and sale of these homes, a Borough Council is faced yet again with a further shortage of "Affordable Housing".</p> <p>So in my view the "Affordable Housing" concept is just a means whereby Local Authorities are manipulated into supplying Green Belt land for, and subsidising the building of, smaller private houses.</p> <p>The solution is to build a high stock of Local Authority houses for rent.</p> <p>If all Borough Councils had such a stock of houses for rent this would increase workforce mobility across the country, reducing benefits dependence, and filling the job vacancies that some claim currently require immigration.</p> <p>All of the above comments also apply to Policy HO3.</p>
<p>8.3 Policy ED1 Economic Development Policy ED 1</p> <p>Economic Development</p> <p>1. A range of different types and sizes of employment land and</p>	<p>Increase in business premises means more residents and more traffic. But</p>

<p>premises will be encouraged to maintain a portfolio of sites to meet the diverse needs of the local economy. Appropriate intensification, redevelopment and upgrading of existing sites and premises will be encouraged and supported to make their use more efficient and to help meet the forecast demand over the plan period and to respond to modern business needs. Office type development will be focused in town centres and existing employment areas</p> <p>2. Proposals should endeavour to improve the education and skills levels of Borough residents and initiatives will encourage the use of local labour, particularly on the development of large and strategic sites. Development proposals that would assist small and start-up businesses will also be supported.</p> <p>3. The development of large and small businesses will be supported to encourage local employment opportunities and useful services.</p>	<p>in many areas existing roads cannot cope. Windsor is blocked when Legoland is in full swing. I hear that Legoland seek to open a backdoor to their site that would lead to more traffic on Forest Green Road and the A330.</p> <p>It is appreciated that residents need work – have to strike a balance between work for existing residents and work that requires more residents. Further, replacing Squires and Wyvale and other business areas with houses reduces the work for existing residents.</p>
<p>8.8 Policy ED2 Defined Employment Sites Policy ED 2 Employment Sites</p> <p>1. The BLP will retain sites for economic use and employment as defined on the Policies Map. Proposals for other uses on defined employment sites will be supported if they demonstrate a sufficient benefit for the economy.</p> <p>2. The following sites are allocated as strategic locations in 5.9 'Policy SP1 Spatial Strategy' for mixed uses:</p> <p>a. Land south of the A308(M), west of Ascot Road and North of the M4 (Known as the Triangle Site)</p> <p>=>></p> <p>6. Within industrial areas there will be a strong presumption in favour of retaining premises suitable for industrial, warehousing and similar types of uses, along with premises suitable for smaller and start-up businesses. Proposals for new premises suitable for these types of uses will be supported.</p> <p>7. Other uses will only be permitted if they are ancillary to industrial or warehousing uses, do not result in the loss of industrial or warehousing premises or demonstrate a sufficient benefit for the economy of the Borough.</p> <p>8. Within business areas and mixed use areas, intensification of employment activity will be encouraged subject to the provision of appropriate infrastructure and safe access. An element of residential</p>	<p>The area shown at 2(a) (Area HA9) is one that, in response to the 2014 consultation, local residents required would continue as Green Belt.</p> <p>RBWM agreed in 2015 that it would remain as Green Belt and have no acceptable justification for now changing its Green Belt status.</p> <p>The Local Plan development proposals include the ending of some businesses.</p> <p>The Garden Centres loss will mean more travel especially as new homes will have empty gardens needing to be stocked.</p> <p>The intention to have industrial warehousing in Area HA9 could result in a big increase in heavy vehicle</p>

<p>development may also be acceptable in mixed use areas but it must ensure that the overall quantum of employment floorspace within the mixed use area as a whole is not reduced.</p> <p>9. Within industrial, business and mixed use areas, development proposals that improve and upgrade the facilities available to support businesses will be supported.</p>	<p>traffic. For instance an "Amazon type" warehouse would generate a huge amount of traffic.</p> <p>"Residents First" is an RBWM slogan – that principle needs to be followed in this Local Plan.</p>
<p>12.5 Policy NR2 Renewable Energy Policy NR 2 Renewable Energy</p> <p>1. Development proposals for the production of renewable energy and associated infrastructure will be supported. Renewable energy development should be located and designed to minimise adverse impacts on landscape, wildlife, heritage assets and amenity. Priority will be given to development in less sensitive areas including major transport areas or on previously developed urban land.</p> <p>2. Development proposals should illustrate how the location and design of renewable energy generation proposals are appropriate to the chosen location, do not cause adverse harm to the area and in the case of more sensitive areas are small scale.</p> <p>3. The following matters will be considered in the determination of renewable energy generation proposals:</p> <ul style="list-style-type: none"> a. potential to integrate the proposal with existing or new development b. Best Practicable Environmental Option (BPEO) which should include an evaluation of the potential benefits to the community and opportunities for environmental enhancement c. proximity to adequate transport networks d. availability of suitable connections to the electricity distribution network. <p>4. Development proposals for wind energy development will only be supported where they are located in areas identified as being suitable for small or medium and large turbines on the Wind Mapping Exercise Maps and on sites allocated for wind energy development in Neighbourhood Plans.</p>	<p>Para 4. - I object to the inclusion in the Wind Mapping Exercise Maps of Area HA9 and the Area adjacent to Holyport Road formerly known as Area 7A, as areas upon which Wind Farms may be built</p> <p>I recognise that Para 4 of Policy NR2 includes a condition that a Neighbourhood DEVELOPMENT Plan would also have to have allocated the site for such, however we have no way of knowing what future schemes a Neighbourhood Development Plan for Bray Parish would decide, so the areas allocated by the Local Plan have to exclude these areas.</p> <p>I also object to the lack of clarity in the Wind Mapping Exercise Maps as to precisely where the boundaries of the suitable / unsuitable areas lie. They appear for instance to allow the use of Holyport Green!</p>
<p>13.3 Policy EP1 Environmental Protection Policy EP 1 Environmental Protection</p> <p>1. The cumulative impact of developments will be a key consideration for development proposals.</p>	<p>Development of Green Belt Area HA9 will contravene paragraphs (2), (3), (5), (6)</p>

<p>2. Development proposals should not significantly and adversely impact the local environment.</p> <p>3. Development proposals will only be supported where it can be shown that either individually or cumulatively in combination with other schemes, they do not have an unacceptable effect on environmental quality or landscape, both during the construction phase or when completed. Development proposals should also avoid locating sensitive uses such as residential units, schools or hospitals in areas with existing or likely future nuisance, pollution or contamination.</p> <p>4. Where appropriate, applicants will be required to submit details of remedial or preventative measures (for example: construction management plans) and any supporting environmental assessments. Planning conditions may be imposed to ensure implementation of any measures that make development proposals acceptable.</p> <p>5. Development proposals should seek to maintain existing environmental quality in the locality, and improve quality where possible, both during construction and upon completion. Opportunities for such improvements should be incorporated at the design stage or through operation.</p> <p>6. Residential amenity may be harmed by reason of noise, smell or other nuisance. Accordingly, care should be taken when siting particular commercial or agricultural proposals such as livestock units, silage storage or slurry pits which should be sited well away from the curtilage of any residential property.</p>	<p>Re (2) Development will add more adverse traffic.</p> <p>Re (3) - As for (2) plus noise of construction. Being subject to air and noise pollution from traffic on all three sides. HA9 site itself may contain contamination.</p> <p>Re (5) Environmental quality of Holyport Area will be worsened by warehousing and /or business premises due to resulting extra traffic.</p> <p>Re (6) - As (2) – AND – currently RBWM are accepting the near future noise and disturbance from intended Smart Motorway works in HA9.</p>
<p>13.4.1 Air pollution in the Borough relates mainly to pollutants emitted from road transport sources, together with other pollutants as specified within the UK Air Quality Strategy. Local Authorities have a duty to declare Air Quality Management Areas (AQMA's) and work towards achieving national air quality objectives in areas where residents are exposed to pollutants in excess of the objectives. It is therefore important to ensure that new development proposals, either individually or cumulatively, do not significantly affect residents within existing AQMA's by generating unacceptable levels of pollution.</p>	<p>The increased housing objective is incompatible with the air pollution objective.</p> <p>Residents in new housing on HA18, HA11 and HA26 will travel. It may be that existing AQMA's will become worse and new AQMA's will emerge. As I write I hear that the cities of Athens, Madrid, Mexico City and Paris are considering a ban of diesel powered vehicles.</p>
<p>13.5 Policy EP2 Air Pollution</p>	

<p>Policy EP 2 Air Pollution</p> <p>1. Development proposals will need to demonstrate that they do not significantly affect residents within or adjacent to an Air Quality Management Area (AQMA) or to residents being introduced by the development itself.</p> <p>2. Development proposals will be supported where significant increases in air pollution can be mitigated, thus reducing the likelihood of health problems for residents.</p> <p>3. Development proposals should aim to contribute to conserving and enhancing the natural and local environment, by avoiding putting new or existing occupiers at risk of harm from unacceptable levels of air quality. Development proposals should show how they have had regard to the UK Air Quality Strategy or any successive strategies or guidance, ensuring that pollutant levels do not exceed or come close to exceeding national limit values.</p> <p>4. Development proposals should show how they have considered air quality impacts at the earliest stage possible; where appropriate through an air quality impact assessment which should include the cumulative impacts. Where relevant, air quality and transport assessments should be linked to health impact assessments, including any transport related mitigation measures that prove necessary.</p>	<p>Any new housing or business development will add to Air Pollution merely by the new vehicular traffic that it generates.</p> <p>Development of Green Belt Areas HA6, HA7, HA8, HA9, HA11, HA18, HA23 will produce more traffic and more pollution..</p> <p>Closure of Garden Centres Wyvale and Squires will mean that drivers have to make longer journeys. New homes will have gardens to be stocked with plants from garden centres, but as local garden centres will have been made into housing estates, with this Local Plan RBWM is designing in increased travelling and increased pollution.</p>
<p>13.9 Policy EP4 Noise Policy EP 4 Noise</p> <p>1. Development proposals should consider the noise and quality of life impact on recipients in existing nearby properties and also the intended new occupiers ensuring they will not be subject to unacceptable harm.</p> <p>2. Development proposals that generate unacceptable levels of noise and affect quality of life will not be permitted. Effective mitigation measures will be required where development proposals may generate significant levels of noise (for example from plant and equipment) and may cause or have an adverse impact on neighbouring residents, the rural character of an area or biodiversity.</p> <p>3. Development proposals in areas significantly affected by aircraft, road or rail noise will be supported if the applicant can demonstrate via a noise impact assessment, effective mitigation measures.</p>	<p>Housing and industrial development as proposed in Green Belt Areas HA6, HA7, HA8, HA9, HA11, HA18, HA23 will increase noise due to the new traffic that these developments will generate.</p> <p>Quality of life of existing residents will be adversely affected.</p> <p>RBWM is presently allowing Highways England to place noisy plant in Area HA9</p>

<p>4. Development proposals will need to demonstrate how they have met the following internal noise standards for noise sensitive developments:</p> <p>4a. internal noise levels within all habitable rooms shall not exceed an average noise level (LAeq) of 35 dB(A) during the daytime measured between 07.00am to 11.00pm</p> <p>4b. Internal noise levels within all habitable rooms shall not exceed an average noise level (LAeq) of 30 dB(A) during the night – time measured between 11.00pm and 07.00am</p> <p>4c. Internal noise levels shall not exceed a maximum noise level (LAmax) of 45 dB(A) at night within the bedroom environment</p> <p>4d Where feasible measures shall be taken to ensure the external noise levels as part of the development do not exceed an average noise level (LAeq) of 55 dB(A) during the daytime measured between 07.00am and 11.00pm</p> <p>5. The Council will require noise impact assessments to be submitted in circumstances where development proposals will generate or be affected by unacceptable levels of neighbourhood or environmental noise.</p> <p>Neighbourhood Noise</p> <p>6. Where neighbourhood noise associated with a particular development is likely to cause unacceptable harm to existing or future occupiers, the Council will require applicants to submit a noise assessment.</p> <p>7. Development proposals will be expected to demonstrate how exposure to neighbourhood noise will be minimised by the use of sound insulation, silencers, noise limiters, screening from undue noise by natural barriers, man made barriers or other buildings and by restricting certain activities on site.</p> <p>Environmental noise</p> <p>8. Development proposals will need to carry out a noise impact assessment in compliance with BS7445-1: 2003 for development proposals affected by environmental noise, to determine the noise levels that affect the development, and will also need to submit noise insulation and ventilation measures in compliance with BS8233. In addition noise mitigation measures will also need to be adopted to provide some protection of outdoor amenities from excessive noise levels from road and rail noise.</p>	<p>Development in Areas HA9 and HA7 will be very badly affected by traffic noise from the A308(M), A330 and M4.</p> <p>There are roads in the Borough whose surface is such that traffic passing over it generates far more noise than is produced by traffic over modern quiet road surfaces.</p> <p>One such road is Holyport Road. I have asked many times that it be resurfaced in quiet material. New traffic on it will result from the development proposed in Area HA17 Tectonic Place. Also, use of HA9 for Smart Motorway work will cause traffic to divert on Holyport Road, and others such as Moneyrow Green and Forest Green Road. A new Holyport Road surface is required, together with a roundabout at the junction with Tectonic Place.</p> <p>Such roundabouts are part of the Traffic Calming strategy mentioned in RBWM's Highways Design Guide. I have asked several times for roundabouts on Holyport Road.</p> <p>Requirements shown in 8 should be applied in the case of the Main Construction Compound for the Smart Motorway, intended to be in "The Triangle"</p>
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<p>14.3 Policy NE1 Nature Conservation Policy NE 1 Nature Conservation</p> <p>1. Designated sites of international, national and local importance will be maintained, protected and enhanced. Protected species will be safeguarded from harm or loss.</p> <p>2. Development proposals should demonstrate how they maintain, protect and enhance the ecological richness of application sites including features of conservation value such as ancient woodland, hedgerows, trees, river corridors and other water bodies and the presence of protected species. Development proposals must avoid damage to designated sites and where unavoidable adverse impacts arise they should be appropriately mitigated. Compensatory measures will only be used as a last resort.</p> <p>3. Development proposals should ensure appropriate access to areas of wildlife importance and identify areas where there is opportunity for biodiversity to be improved. Development proposals should also avoid the loss of biodiversity and the fragmentation of existing habitats. Where opportunities exist to enhance designated sites or improve the nature conservation value of habitats they should be designed into development proposals. Development proposals should aim to achieve a net gain in biodiversity and to enhance green corridors and networks.</p> <p>4. Where the impacts of development are significant, development proposals should be accompanied by ecological reports to aid assessment of the proposal. Such reports should include details of any alternative sites considered and any mitigation measures considered necessary to make the development acceptable.</p> <p>5. The biodiversity of application sites should be protected and enhanced by measures to:</p> <ul style="list-style-type: none"> a. conserve and enhance the extent and quality of designated sites b. conserve and enhance the diversity and distribution of habitats c. restore and recreate habitats lost as a result of development d. recognise the importance of green corridors, networks and open space including water bodies, green verges, woodland and hedges e. avoid the fragmentation of existing habitats f. where appropriate recognise the importance of urban wildlife g. conserve soil resources to protect below ground biodiversity 	<p>The RBWM Local Plan intends that Green Belt areas HA6, HA8, HA7 and HA9 will all be built on. This is a combined area of around 104 Hectares.</p> <p>Policy NE1 refers to protected species – but as time goes on more and more species of animal and bird are under threat. Many need to be protected even before being officially recognised as a protected species.</p> <p>To remove from Green Belt or to change to built-up from being open spaces where wildlife can flourish all of the areas above at one fell swoop (104 Hectares) will be extremely detrimental to wild animals and wild birds.</p> <p>The proposed building on Areas HA6, HA7, HA8, HA9 will connect Maidenhead to Holyport. This is counter to four of the five purposes of the NPPF i.e;</p> <ul style="list-style-type: none"> 1. To check the unrestricted sprawl of large built-up areas; 2. To prevent neighbouring towns merging into one another; 3. To assist in safeguarding the countryside from encroachment; 4. To preserve the setting and special character of history towns;
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<p>which in turn helps retain and enhance above ground biodiversity.</p>	
<p>14.11 Policy NE3 Trees, Woodlands and Hedgerows Policy NE 3 Trees, Woodlands and Hedgerows</p> <p>1. Development proposals should seek to maximise opportunities for creation, restoration, enhancement and connection of natural habitats as an integral part of proposals in accordance with the Tree and Woodland Strategy for the Borough.</p> <p>2. Development proposals should carefully consider the individual and cumulative impact of proposed development on existing trees, woodlands and hedgerows, including those that make a particular contribution to local character, appearance of the streetscape and distinctiveness. This may include but is not limited to aged or veteran trees and landmark trees and, in particular, Ancient Woodland.</p> <p>3. Development proposals should:</p> <ul style="list-style-type: none"> a. protect and retain trees, woodlands and hedgerows; b. where harm to trees, woodland or hedgerows and their habitat is unavoidable, provide appropriate mitigation measures that will enhance or recreate habitats and new features; and c. plant new trees, woodlands and hedgerows or extend existing coverage where possible. <p>4. Where trees, hedgerows or woodland are present on site or within influencing distance of the site, or where there is reason to suspect the presence of protected species, applications will need to be accompanied by an appropriate survey, constraints plan, impact or ecological assessment by professional consultants. Proposals will need to assess and demonstrate how they are sensitive to, and make provision for the needs of protected species. Tree surveys and tree constraint plans should be compliant with British Standard 5837 or successive standards</p> <p>5. Development proposals should include detailed planting proposals. Applicants should provide indicative planting schemes at the point of submitting a planning application and should allow adequate space for existing and new trees to grow so as to avoid future nuisance.</p> <p>6. Since unsuitable species, such as Leyland Cypress, may have an anti-social effect in the future, it is expected that planting schemes will carefully consider the selection of species, planting native</p>	<p>The RBWM Local Plan intends that Green Belt areas HA6, HA8, HA7 and HA9 will all be built on. This is a combined area of around 104 Hectares.</p> <p>Policy NE3 refers to natural habitats – and protection of trees hedgerows etc advocating that development proposals (by builders and developers) are to protect etc as shown in the policy. But RBWM themselves are causing such destruction by identifying and allowing the aforementioned areas to be developed.</p> <p>To remove from Green Belt or from being open spaces where wildlife can flourish all of the areas above at one fell swoop (104 Hectares) will be extremely detrimental to wild animals and wild birds.</p> <p>The proposed building on Areas HA6, HA7, HA8, HA9 will connect Maidenhead to Holyport. This is counter to four of the five purposes of the NPPF i.e;</p> <ul style="list-style-type: none"> 1. To check the unrestricted sprawl of large built-up areas; 2. To prevent neighbouring towns merging into one another; 3. To assist in safeguarding the countryside from encroachment; 4. To preserve the setting and special character of history towns;

species where possible.	The same general comments apply to policy NE4, NE5
<p>15.5.3 A sequential site assessment was undertaken by the Borough's consultants. This sequential test was based on a policy approach that was compliant with the requirements of the NPPF. The sequential assessment considered strategic issues such as other planned development prescribed as part of the overarching Spatial Strategy of the Borough Local Plan. The sequential assessment also drew on other parts of the evidence base that supports the Borough Local Plan such as the Edge of Settlement Study.</p> <p>15.5.4 The sequential assessment concluded that a site at Braywick Park currently occupied by the Golf Driving Range was the most sequentially preferable site which is available, suitable and deliverable for the provision of a new leisure centre and associated indoor and outdoor sporting facilities.</p> <p>15.5.5 The existing preferable site at Braywick Park is in the Green Belt and forms part of the open space provision in the Borough. The NPPF would consider the provision of a new leisure centre in this location 'Inappropriate development.' In order to remove this site from the Green Belt and allocate it for development Paragraph 83 the NPPF requires a case of 'Exceptional Circumstances' to be established.</p> <p>15.5.6 There are a number of issues that are considered to comprise such 'Exceptional Circumstances' to allow for the de-designation of the site at Braywick Park:</p>	The adjacent text makes no mention of the fact that RBWM is also making homeless the Maidenhead Target Shooting Club that has been established in the area, paying rent to RBWM for over 100 years.
<p>Statement 1 Exceptional Circumstances to support allocation at Braywick Park</p> <p>1. There is an evidence base of objectively assessed needs (OAN) for a new leisure centre to meet Maidenhead's current and future needs;</p> <p>2. A sequential site assessment demonstrates that there are no sequentially preferable sites which are appropriate, suitable or viable alternatives;</p> <p>3. Braywick Park golf driving range is within the Council's ownership, and subject to planning, capable of delivery well within five years and before the existing centre is decommissioned ;</p>	The Maidenhead Target Shooting Club is also within the Council's ownership, but has not been

<p>4. Relocation of the Magnet would free up the existing site on Saint-Cloud Way. This would deliver in the order of 500 new homes within the first five years of the BLP, which would make a significant contribution to the Borough's housing targets and five year housing land supply;</p> <p>5. Housing development at Saint-Cloud Way would be a sustainable pattern of development, in accordance with the BLP strategy to deliver additional new homes within Maidenhead town centre;</p> <p>6. Location of a new indoor leisure facility at Braywick golf driving range would generate significant synergies with the range of outdoor sports facilities at Braywick Park, creating a sports and leisure hub with centres of excellence for able and disabled users;</p> <p>7. Braywick Park is a short walking distance from Maidenhead town centre, is accessible by public transport, and a highly prominent and accessible location;</p> <p>8. The sports and leisure hub would be immediately opposite the proposed Strategic Location for Growth for up to 2000 new homes on the site of the current Maidenhead Golf club and land to the south of the Golf Club.</p> <p>9. The Edge of Settlement Analysis demonstrates that the Green Belt at this point makes only a moderate contribution to preventing settlements from merging and a limited contribution to other Green Belt aims;</p> <p>10. The Council as owner and funder of the new leisure centre would ensure a high quality design response; and</p> <p>11. Loss of existing open space would be justified in accord with NPPF Paragraph 74, namely that the open space would be replaced by development for alternative sports and recreational provision, the needs for which clearly outweigh the loss.</p>	<p>mentioned here. Why is that?</p> <p>Mention is made here (6) of a new indoor leisure centre that "would generate significant synergies with the range of outdoor sports facilities at Braywick Park, creating a sports and leisure hub with centres of excellence for able and disabled users;" - The range of outdoor sports facilities currently at Braywick Park includes the Maidenhead Target Shooting Club, which can also accommodate disabled users. Why is their sport not being catered for in the new development?</p> <p>The loss of the Maidenhead Target Shooting Club is apparently not one that RBWM considers of any consequence.</p>
<p>15.16 Policy IF6 Water Supply and Sewerage Infrastructure Policy IF 6 Water Supply and Sewerage Infrastructure</p> <p>1. Development proposals should demonstrate that adequate water supply and sewerage infrastructure capacity exists both on and off site to serve the development and that the development would not lead to problems for existing users. Where such evidence is not available or the potential impacts are unclear the Council will expect developers to carry out appropriate studies to ascertain whether the proposed development would lead to overloading of existing water</p>	

<p>and sewerage infrastructure.</p> <p>2. Specific development proposals may require further study into their particular impacts and if the study identifies that the water or sewerage network would be unable to support demand arising from a development proposal and if no improvements are programmed by the water or sewerage company, the developer will need to contact the company to agree what improvements are needed and how they will be funded prior to occupation of the development.</p> <p>3. Where works are required to secure water supply and sewerage provision to a development proposal, such works will be secured either by a planning condition or other mechanism as appropriate.</p> <p>4. New water resource schemes, improvements to the water supply network, demand management measures needed to meet current and future water supply needs and those needed to meet the challenges of climate change and environmental protection will be supported. Sites that are identified by water or sewerage undertakers or the Environment Agency as being required to deliver necessary water or sewerage infrastructure will be allocated or safeguarded as appropriate.</p> <p>5. Development proposals should include water efficiency measures aimed at reducing overall water consumption to reduce the pressure that a proposal will have on existing infrastructure.</p>	<p>It is very concerning that despite the expected Climate Change problems RBWM are prepared to proceed with the developments proposed in this Local Plan.</p> <p>All of the major development proposed for Green Belt may add far too many homes for the water supply and sewerage infrastructure to cope with. Flooding risks are increasing.</p>
<p>Page 162 in the Glossary</p> <p>Neighbourhood Plan: A plan prepared by a Parish Council or Neighbourhood Forum for a particular neighbourhood area (made under the Planning and Compulsory Purchase Act 2004).</p> <p>Neighbourhood Plan Area: The land area covered by a Neighbourhood Plan.</p>	<p>"Neighbourhood Plan" should be written "Neighbourhood Development Plan"</p>
<p>HA6: Maidenhead Golf Course</p> <p>Allocation 2,000 residential units.</p> <ul style="list-style-type: none"> * Educational facilities including primary and secondary schools. * Strategic public open space and, formal play and playing pitch provision. * Multi-functional community hub as part of a Local Centre. <p>Designed sensitively to conserve biodiversity of the area.</p>	<p>There is no way that the allocation can be designed to conserve the biodiversity of the area.</p>
<p>HA7: Land south of Harvest Hill Road, Maidenhead</p>	

<p>Allocation 350 residential units.</p> <ul style="list-style-type: none"> * Provide appropriate mitigation measure to address the impact of noise and air quality from the A404(M) and A308(M). * Designed sensitively to consider the impact of long distance views. * Designed sensitively to enhance the gateway into Maidenhead. * Designed sensitively to conserve biodiversity of the area. * Vehicular access 	<p>I doubt if this noise and air quality requirement is possible – and the M4 also provides air and noise pollution.</p> <p>Biodiversity will be lost.</p> <p>Vehicular Access is a huge problem and will contravene other policies.</p>
<p>HA8: Land south of Manor Lane, Maidenhead</p> <p>Allocation 180 residential units</p> <ul style="list-style-type: none"> * Designed sensitively to conserve biodiversity of the area. * Vehicular access 	<p>Biodiversity will be lost.</p> <p>Vehicular Access is a huge problem and will contravene other policies.</p>
<p>HA9: Land south of the A308(M), west of Ascot Road and north of the M4 (Known as the Triangle Site)</p> <p>Allocation 150 residential units</p>	<p>This land was formerly known in the 2014 consultation as Area 5C.</p> <p>Holyport Area Residents responded to a Holyport Residents Association survey giving a 90% support for retaining this land as Green Belt.</p> <p>RBWM agreed in 2015 that it stay as Green Belt. It is not appropriate that RBWM should now go against their residents wishes.</p> <p>See Reports 6 and 7 on Highways and Transport and Assessment of Flood Risk in the table of documents submitted to RBWM in 2104 shown on page 1 of this document, together with all other reports listed there.</p> <p>Accessible through HRA website.</p>
<p>HA11: Land west of Windsor, north and south of the A308, Windsor</p> <p>Allocation 650 residential units</p> <p>Educational facilities</p> <p>Strategic public open space</p> <p>Formal pitch provision for football and rugby</p> <p>Multi-functional community hub.</p>	<p>The Bray Parish Neighbourhood Development Plan and I both deprecate any use of this “Green Gap” Green Belt land.</p>
<p>HA17: Tectonic Place, Holyport Road, Maidenhead</p> <p>Allocation 25 residential units</p>	<p>It is known to local residents that the prospective builder has bought at</p>

	<p>least two adjacent houses and part of the garden of another. So it is likely that there will be more than 25 units. No mention is made in the Local Plan of vehicular access.</p> <p>There has always been a narrow access to this site from Hendons Way but it has been seldom if ever used. With appropriate land purchase this access could theoretically be made, with bad effects on Hendons Way, Stompits Road, Stroud Farm Road and the access to the School on Stroud Farm Road.</p> <p>Worse still I think would be if there were to be access to this site from both Hendons Way and Holyport Road, especially of it were a through road.</p> <p>I believe that access from only Holyport Road would be best, with a roundabout on Holyport Road at the entrance to Tectonic Place.</p> <p>The addition of say two cars per household in this new development is detrimental to air quality and amenity of road users.</p>
<p>HA18: Land between Windsor Road and Bray Lake, south of Maidenhead</p> <p>Allocation 100 residential units</p> <p>Relocation of Thames Hospice</p>	<p>Should not build on the flood plain.</p> <p>. See; http://maps.environment-agency.gov.uk/wiyby/wiybyController?value=SL6+2HA&submit.x=11&submit.y=7&lang=_e&ep=map&topic=floodmap&layerGroups=default&scale=9&textonly=off</p> <p>and here; http://maps.environment-agency.gov.uk/wiyby/wiybyController?value=SL6+2HA&submit.x=13&submit.y=13&lang=_e&ep</p>

	=map&topic=fwa&layerGroups=default&scale=9&textonly=off See the Report 7 on Highways and Transport and Assessment of Flood Risk in the table of documents submitted by HRA and HPS in 2014 shown on page 1 of this document. Accessible through HRA website. If, despite objections, this area is built on, then the Thames Hospice option is better than houses.
HA23: Land west of Monkey Island Lane, including water treatment works, Maidenhead Allocation 100 residential units.	Should not build on the flood plain. See the Report 7 on Highways and Transport and Assessment of Flood Risk in the table of documents submitted in 2014 shown on page 1 of this document. Accessible through HRA website.
HA32: Heatherwood Hospital, Ascot Allocation 250 residential units (in addition to retained health use).	Will the scope and capacity of the promised hospital facilities be at least equal to that presently existing?

- In all parts of the Local Plan where the number of allocated units is listed, how does RBWM intend to control that only the number of homes specified in the Local Plan will be built? For instance in the case of Tectonic Place – we have a red line around the supposed boundary, but local residents know that the builder involved has bought more land from some adjacent residents.
- Throughout the Local Plan there is too much use of the word “should”. It needs to be replaced with words such as “will”, “must”, “are to”. The words “where possible” “mitigate or reduce” are also deprecated. Further In e.g. Policy NE6 and IF1 I suggest that the words “Subject always to the requirements of other policies” should preface e.g “development proposals will be supported...”, “proposals for new....” Otherwise we have the situation where a relatively minor policy for rights of way and community facilities appears to allow development where much more stringent requirements set elsewhere apply.
- Building is proposed in Flood Plain – this is wrong.
- In the proposed Local Plan, mention is made of traffic concerns. The addition of the homes proposed will undoubtedly increase traffic, yet RBWM is doing nothing to improve roads. The extra homes will increase traffic going to and from M4 J8/9. It is obvious that much traffic from the countryside between M4 8/9 and M4 10 heading for or from London or other Eastbound attractions travels via M4 J 8/9. A new motorway

junction is needed between M4 8/9 and M4 10. I have suggested this on several occasions – and do so again here.

Conclusions

The following is similar to the conclusions that the HRA submitted to RBWM in March 2014.

The NPPF recognises that the Green Belt serves five purposes:

1. To check the unrestricted sprawl of large built-up areas;
2. To prevent neighbouring towns merging into one another;
3. To assist in safeguarding the countryside from encroachment;
4. To preserve the setting and special character of history towns;
5. To assist in urban regeneration, by encouraging recycling of derelict and other urban land.

I consider that Green Belt Areas that should remain as Green Belt are HA6, HA7, HA8, HA9, HA11, HA18 and HA23.

Development on these areas and on HA17, which is not Green Belt, will add far more traffic to this already severely congested area.

Regarding Areas HA7, HA8, HA9, their non-development would comply with purposes 1 to 4. Their development would be contrary to these purposes, as building would effectively fill the present gap between Maidenhead and the Holyport Area.

The existing traffic difficulties for the A330, A308, A308(M) and M4 Junction 8/9 would be worsened by any development of Areas HA6, HA7, HA8, HA9, HA11, HA17, HA18 and HA23. Air quality is already bad at the A308, Holyport Road, Upper Bray Road junction, and will become worse as the M4 traffic density increases by 33.3% with the addition of two more lanes. The traffic increases arising from the proposed developments will also worsen the air quality.

It is suspected that air quality on Holyport Road at peak traffic times may be bad enough for an AQMA. I would like a check carried out on Holyport Road. If the works for the smart motorway are placed in HA9 then the A330 in that area will be likely to have bad air quality and may already be bad enough for an AQMA.

Bracknell Forest Borough Council has an intention to build 4900 houses North of Bracknell (Warfield and Binfield), (current status not checked – maybe some are in existence now) and this would result in increased traffic on the A330 to and from M4 Junction 8/9, travelling past the only access to Area HA9, and on the Holyport Road.

An increase in traffic is expected due to rail passengers using cross-rail.

There is great concern over flood risks for some sites and also re the capability of existing sewerage, even with improvements, to additionally serve these new areas.

The specialist reports commissioned by the Holyport Preservation Society and also included with the HRA submission of 21st March 2014 amply demonstrate and substantiate these concerns. (Reports listed on page 1 are accessible through the HRA website.)

Regarding Areas HA7, HA8, HA9, I claim that special circumstances apply requiring that they remain as Green Belt, as these are a gap between settlements that meet the "Settlement Gap" criteria RBWM have applied elsewhere in deciding that an area cannot be developed. Also, the NPPF's five purposes of Green Belt apply.

The London Green Belt Council agreed with us about settlement gap status.

I have also discussed the concept of Settlement Gaps with the CPRE (Campaign to Protect Rural England). The local branch indicated their support for this concept and they referred us to the Governments Written Ministerial Statement in July 2013 stating that that the single issue of housing demand does not in itself justify building on the Green Belt. CPRE confirmed they had welcomed this statement and called on Ministers to take urgent further action to safeguard the Green Belt, including:

- Making a clear statement that suitable brownfield sites in urban areas should be used before greenfield land in the Green Belt for new development;
- Introducing measures to help local authorities to work together to safeguard the Green Belt and direct development to areas in need of regeneration; and
- Providing clear guidance on the requirement for supplying five years' worth of sites for new housing in local plans, to reduce the scope for developers to promote Green Belt or greenfield land when better brownfield sites are available.

Regarding Area HA9, I strongly suggest that records be searched to establish the truth regarding local knowledge conveyed to me that it was a gravel quarry subsequently backfilled with waste whose identity probably cannot be substantiated. If so then development may be a risky venture. Bray Parish Council reps have advised me that to their knowledge and as advised by other residents, no such gravel extraction took place. Personally I think it very likely that the gravel extraction did take place

Although I am the Chairman of the Holyport Residents Association, this comment is provided by me alone. However, it will be placed on the HRA website.

Andrew Cormie,
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