



# Bray Parish Council

---

## **Response to RBWM Borough Local Plan Borough Local Plan 2013 to 2033**

In the forward to the Borough Local Plan Councillors Dudley and Wilson state that "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 (RBWM)."

Bray Parish Council (BPC) knows from the work carried out over the past five and a half years by the Bray Parish Neighbourhood Plan Working Group (the Bray Plan has been adopted by BPC and lodged with RBWM) that residents of the Bray Parish cherish and wish to retain and improve their Green Belt and, in particular the Green Gap between Windsor and Maidenhead. This "Green Gap" adds to, and has the potential to further enhance the "Setting of the River Thames"

Bray Parish lies between Windsor and Maidenhead and is bordered to the north by the River Thames. The villages and hamlets were originally scattered amongst the dense woodland of Windsor Forest, which still accounts for a sizeable portion of the southeast corner of the parish.

The parish is 2684 hectares (6632 acres) in area, 94.6% of which is Green Belt.

Attached to this document is a copy of the Bray Parish Neighbourhood Plan 2013 – 2033 for further information and BPC would specifically refer readers to the Vision Statement on page 6. "The plan wishes to protect the distinct character of the parish villages and hamlets and maintain the separation between them by safeguarding the Green Belt" thus preventing urban sprawl." According to the National Planning Policy Framework section 9 page 19 the Government attaches great importance to Green Belts, as too, do the residents of Bray Parish. The Bray Neighbourhood Plan reflects this local opinion.

The Borough Local Plan lists a number of potential locations for housing in Bray Parish namely: -

HA7 – 350 Residential Units

HA9 – 150 Residential Units and unspecified number of warehouse and/or industrial units. Reference policy numbers SP1.9 and ED2.2a.

HA 11 – 650 Residential Units

HA 17 – 25 Residential Units

HA 18 – 100 Residential Units

HA 23 – 100 Residential Units

You will see from page 7 of the Bray Parish Neighbourhood Plan that this represents a significant 32% increase on the 4,249 homes in the parish and represents a large incursion into the local Green Belt greatly reducing the “green gap” between Windsor and Maidenhead and between Holyport Village and Maidenhead.

## **Bray Parish Infrastructure.**

Bray Parish is crossed by two main roads, the A308 which is a main route connecting Windsor and Maidenhead running parallel with the Thames and the A330 running from Maidenhead to Ascot/Bracknell. These two roads are already under pressure from the existing volume of traffic, without the additional vehicles associated with further development.

### **A308**

The A308 running from the Braywick roundabout is single carriageway and particularly narrow from Braywick to the junction with Monkey Island Lane.

In the past, there were plans to build another carriageway for this road but cul-de-sac development along this section of road now precludes this possibility. There are traffic tailbacks in peak periods with queues of vehicles waiting to enter the Braywick Roundabout often with stationary traffic back to the junction with Tithe Barn Drive. In the last year, this situation has got worse with the opening of the new link road in Maidenhead, which has increased the traffic moving through Bray Village to and from the A308. This change in traffic has also put more pressure on the Holyport Road and the mini roundabout at its junction with the A308. The section of the A308, in the vicinity of the Upper Bray Road and the Holyport Road junctions, is acknowledged as one of the worst areas in RBWM for atmospheric pollution (see Holyport AQMA).

At the Windsor end of Bray Parish the A308 is subject to daily tailbacks of traffic wishing to access the roundabout underneath the Windsor Relief Road. This is not a new phenomenon as this has been the situation for the last 20 years at least. Peak period traffic now is invariably tailed back to The Willows Roundabout and often extends back to Oakley Court Hotel.

It should be remembered that even if there is no further development planned in the vicinity of the A308 there is already permission granted for sixty plus houses at Water Oakley/Bray Studio and the Phoenix Gym off the A308 at Fifield Road. The Phoenix Gym has more than 800 members and the vast majority of them will travel by car using the A308.

In January 2017 Thames Valley Hospice intends to submit a planning application to relocate to a new complex to be constructed on Site HA18. This hospice, when built, will employ 166 employees including their Home Hospice Nurses who will make numerous car journeys visiting their patients. In addition to this Windsor Racecourse will be seeking permission to build a 150-room hotel adjacent to their racecourse.

You will see from the above that the already serious traffic and pollution problems on the A308 can only get worse without the further development proposed in The Borough Local Plan. All the potential sites in Bray Parish detailed in the Borough Local Plan will directly impact on the A308 and add to the "urban sprawl" of both Windsor and Maidenhead.

None of this considers any increases in traffic likely to be caused by commuters using the new Cross Rail service, or the effect on the A308 of the Smart M4 Motorway Project. Construction traffic could (and should) be restricted to the Motorway network but road works on the M4 will certainly push traffic off the motorway onto the surrounding road network. The A308 runs parallel to the motorway for two junctions and will be used by motorists as an alternative route.

The local bus service is too infrequent to have any mitigating effect on the volume of traffic.

There is a cycle route along the A308 but for most of the way it is shared with the pedestrian footpath. The shared path is so narrow that it is not possible for a push chair/wheelchair and a cyclist to safely pass one another. In view of this, cyclists often use the vehicle carriageway further complicating the situation and adding to the congestion.

## **A330**

The A330 Ascot Road runs from Braywick Roundabout south towards Ascot and Bracknell. The road through Holyport Village is too narrow for large vehicles to safely pass one another without mounting the footpath. To alleviate this situation RBWM has implemented a weight limit on vehicles travelling through Holyport Village. The suggested alternative route directs vehicles on to the A308, thus increasing the traffic there, and then on to B class roads before re-joining the A330 from the unclassified Drift Road. The Drift Road also is a significant "through route" for traffic travelling between Ascot/Bracknell and Windsor and volumes are increasing due to the A330/A308 congestion.

In peak periods, stationary traffic on the A330 tails back through Holyport from the Braywick Roundabout to Forest Green Road and Touchen End. This traffic includes school runs to Holyport College; the number of pupils attending this establishment is currently 356, which will increase to 548 over the next few years.

When the Smart M4 Projects starts in 2017 the Triangle Site (HA9) will be used as a construction depot for at least 10 years, which will add to surrounding area's traffic and pollution. Once the works are finished, going from 6 lanes to 8 on the M4 will increase the areas pollution by up to 33 %. In addition to this, the existing A330 Bridge, over the M4 will be demolished and replaced. Construction traffic will, by necessity, have to travel to and from the Braywick Roundabout to the construction depot further adding to the congestion.

Vehicles trying to dodge the tail back often turn off across Holyport Green to use the Holyport Road or down Forest Green Road through Moneyrow Green thus adding to the congestion at the Holyport Road mini roundabout on the A308.

Large scale, house building projects, outside the borough at Bracknell and Ascot will result in further increases of traffic as commuters travel to Maidenhead Station to access CrossRail.

## **A308M**

The A308 M is a motorway class slip road from junction 8/9 on the M4 down to the Braywick Roundabout. A junction on this road will not be permitted by Highways England and so any development of the Triangle Site (HA9) will only be accessible from the A330, which, as detailed above, is already overloaded.

## **Flooding**

Bray is bordered by The River Thames and a significant part of the parish is in the river floodplain. In addition to this river flooding other parts of the parish suffers from surface flooding. Sites HA7, HA9 and HA11 all have significant flooding issues associated with Lambeth Beds (often referred to as Thames Gravels). Fifield for example is not shown on the Environment Agency maps (see page 11 of the Bray Neighbourhood Plan) as being susceptible to flooding but never the less regularly suffers from surface water flooding not associated with the river system.

Sites HA18 and HA 23 are adjacent to the River Thames and significant sections of the sites are in the floodplain.

Much of the parish has an extremely high water table. This is due in part to The Cut and The Bourne, which are tributaries of the Thames this means the water table is often less than one metre from the surface.

## **Sewage**

Combined with problems regarding surface water, flooding is the very real concern with regards to the disposal of waste water. Other areas within Windsor and Maidenhead share the same issues of watercourse and main river management, ground water levels and highway surface water, in particular Old Windsor Parish which also has concerns with regards to combined flows to the Windsor Sewage Treatment Works (STW) at Ham Island. The following is taken from the Stilwell Report and is reproduced with kind permission of Jane Dawson Chair of Old Windsor Parish Council.

The combined (foul) drainage issues are the responsibility of Thames Water (TW). They collect combined flows from an area much larger than the Parish of Old Windsor; it includes the town and surrounds of Windsor. Thames Water brings the sewage to the Windsor Treatment Works at Ham Island. (3.3 page 6)

“Thames Water has concerns regarding Waste Water Services in relation to this area. Specifically, the sewerage network capacity in this area at present is considered unlikely to be able to support the demand anticipated from development. Drainage Infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on existing infrastructure and the significance of the infrastructure to support development. It should be noted that in the event of an upgrade to assets being required, up to three years lead in time could be necessary for the delivery of the infrastructure.” (9.1 Page 15)

## **Broadband**

The broadband service in the parish is patchy with a significant number of “not spots” and areas of very slow service.

## **Future Trunk Roads**

To improve traffic flow in the whole of the Thames Valley area serious consideration should be given to a M40, M4, M3 link motorway; this could be achieved in the local Maidenhead area by upgrading the A404 from the A4130 Henley Road junction to motorway standard north to the M40 at High Wycombe - Handy Cross Junction. A new, motorway standard road, could then be built south from the Henley Road junction to a new junction 9 on the M4, to be situated in the vicinity of Shurlock Row.

## **Other Local Infrastructure**

In the period, available for this consultation, it has not been possible to look at other infrastructure requirements, but it is unlikely that schools, doctors, dentists and other services are operating at less than full capacity and as such would not be able to cope with the proposed 32% increase in population.

### **HA7: Land south of Harvest Hill Road, Maidenhead**

RBWM's proposal for this land is for 350 residential units.

The southern and low part of this site is subject to flooding associated with the large Ditch (Drain on Map) and from The Cut. The site then rises to Harvest Hill Road. The sections have different owners, including Maidenhead Golf Club (MGC) who own one section which is used as a practice area. A Member confirms that the lower part of this site endures regular flooding.

Access to the site would be from Harvest Hill Road which is already used as a rat run during peak times, when A308(M) is busy, onto the M4, for traffic going onto the A404(M).

Several of the land owners including MGC would support development of this site.

Some infrastructure could be available from the adjoining houses along Harvest Hill to the north.

Apart from flooding other issues include pollution and noise from the proximity of the A308(M) and A404(M).

This area is part of the green gateway to Maidenhead and a necessary part of the area's green lungs, so development would need to be sympathetic to this and save trees and hedgerows for local wildlife.

It was noted in the Bray Parish Neighbourhood Plan that our residents cherish this open green space that separates Maidenhead Town from the motorway network.

## **HA9: Land south of the A308(M), west of Ascot Road and north of the M4 (known as The Triangle Site), Maidenhead**

It is noted that RBWM is proposing 150 Residential Units to be focused in the east of the site, in areas subject to the lowest flood risk. Also, that, separately, RBWM have identified in Policies SP1.9 and ED2.2a that site HA9 "may accommodate housing, industrial and warehousing floor space" – as the housing will be placed in the area least likely to flood (see Flood report extract below for more detail) where will these buildings go? Increase in building in areas prone to flooding could lead to the detriment of nearby communities by increased flooding or this could occur further downstream (see Flood report extract below) from both The Cut and The Bourne. It is also understood that Thames Water has expressed concerns regarding sewage disposal capacity in the area.

This land is surrounded by roads, not just by part of the A404(M), which has 4 lanes as detailed in the consultation, but by the M4 which is soon to go from 6 to 8 lanes, the A308(M) which is 4 lanes and the A330 (Ascot Road). Traffic is already an issue in the area, with the additional 150 houses and industrial/warehousing all exiting onto the Ascot Road, how will this traffic be managed (see Traffic report extract below)? Also, the site would be affected by noise and air quality issues (see detail from Traffic Report below) from the traffic on these surrounding roads.

There is a proposal that a footpath will go through the site from north east and follow The Cut to the Braywick roundabout. This is a very busy area of merging roads, especially at peak times, and the likely hood of residents wanting to walk into Maidenhead Station by crossing these roads is unlikely, also the site is outside of the 800m circle centred on Maidenhead station corresponding to 10 minutes walking at 5km per hour. Therefore, travelling to and from the site will be car dependant.

This road locked site is an important open and green entrance to Maidenhead and a green gap between Maidenhead and the Village of Holyport. It is much appreciated by residents and its' hedges and trees are also considered of high scenic value, this includes the hawthorn hedge on the Ascot Road, before the M4 bridge, when travelling out of Maidenhead. This site provides an important green 'lung' for the area. Coming off the M4 roundabout this green space provides a rural aspect and conveys a feeling of wellbeing before entering the urban environment on the outskirts of Maidenhead town centre. The current undisturbed nature of the site means that there is a high level of bio diversity and ecological value to the site which is again appreciated and valued by residents.

Some use of the site on the east side, which is less prone to flooding, could be used for recreational and leisure activities. The football and rugby pitches, running track, etc. currently at Braywick Park may be relocated to this site and present less of an impact on the residents, however this suggestion is as yet untested with local residents. The 150 houses, warehouses/industrial could be located at Braywick Park which is a 10-minute walk to Maidenhead Station. Keeping the Triangle open and relatively green would help to maintain the impression of a green gap between Maidenhead and the Village of Holyport.

This Triangle land has been farmed consistently since around the 1920s, mostly with cows by the son of Gerald Clinch, Harry. This information has been provided and confirmed by local residents, some of whom still farm in the area and knew Harry Clinch. One resident lived in Willow Drive, opposite, born there in the 1960s and whose parents lived in the area for many years and their Mother still does. Also, one resident who is 93 and cycled past every day on her way to work in Maidenhead. Only break in the use of this land has been once a year for the Littlewick Green show on August Bank Holidays, now moved to another site as requested by land owners. Also, a temporary small area was taken up in 2004/5 for M4/A404(M) works compound, afterwards the site was returned to green fields.

N.B. since the Traffic and Flood reports were commissioned in 2014, it has been confirmed that this site will be used by Highways England for at least 10 years for the M4 Construction Compound 5. The area to be used for this is on the eastern side which is less prone to flooding. Bray Parish Council are working with Highways England to try to mitigate impact of this on residents and the surrounding area.

-----



Detail below is extracted from a Report commissioned by Holyport Preservation Society and is used with their agreement.

The report is titled

**"The Assessment of Flood Risk for Proposed Development Sites at Holyport"**

written by: **Dr Harvey J.E. Rodda FRGS**

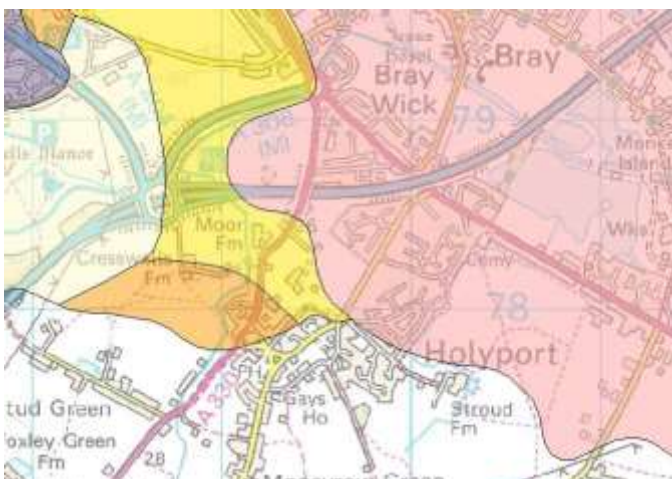
dated: **March 2014**

**N.B this report in its entirety has been provided to RBWM.**



**Figure 1. The Cuts DTM and flow pathways (blue lines) for HA9.**

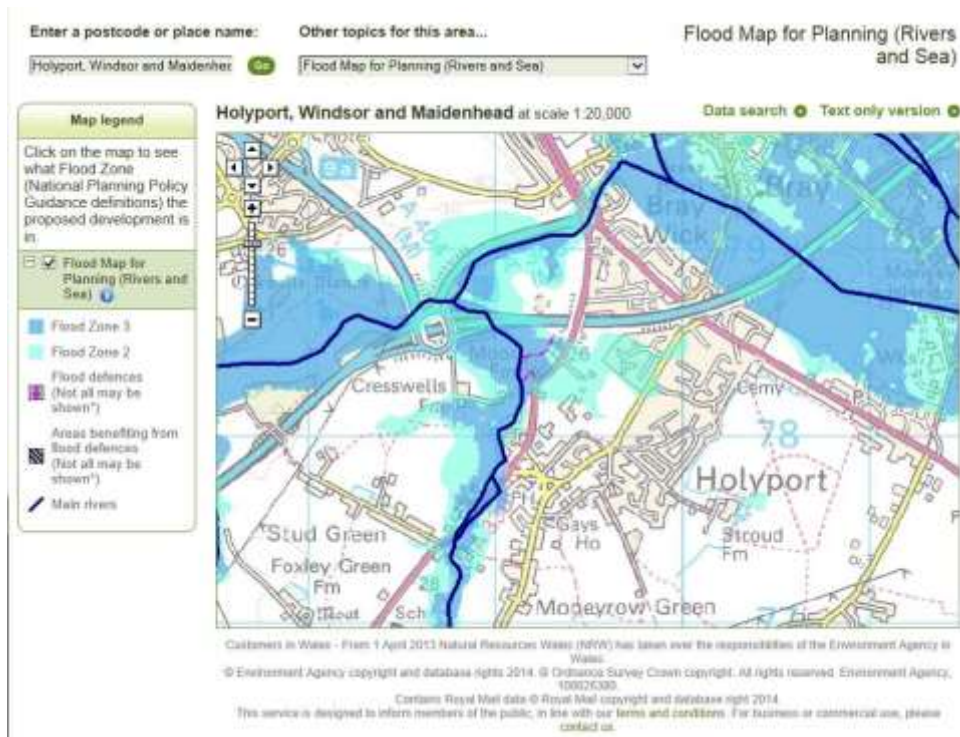
The Digital Terrain Model (DTM) ground levels range from 21m AOD (spot height in dark green) to 33m AOD (spot height in red) taken from an airborne survey and is accurate to +/- 0.3m.



**Figure 2. EA groundwater vulnerability map for HA9 and surrounding areas.**

Major aquifer high vulnerability: purple, intermediate vulnerability: pink. Minor aquifer high vulnerability: orange, intermediate vulnerability yellow.

The soils are characterised by an area of freely draining loamy soil to the east with slowly permeable seasonally wet clay soils to the west.



**Figure 3.**

The most accurate information on the current flood risk is provided by the EA in the form of maps and predicted flood levels based on the results of detailed flood modelling studies. Such studies to predict the extent of fluvial (river) flooding have been undertaken on the River Bourne. This information forms the basis of the EA Flood Zone maps which can be accessed on the internet. The dark blue lines indicating the Cut and River Bourne are classified as main rivers. The predicted extent of flooding is shown in terms of the 1 in 100 year outline (zone 1 – high risk) and the 1 in 1000 year or extreme flood outline (zone 2 – medium risk).

## **Conclusion**

This study has investigated the background conditions at the proposed development site and made an assessment of the risk of flooding at the site based on published information. The risk of flooding from a range of sources is summarised in Table 1 below. Overall the risk of flooding is considered as high and therefore the site should be rejected as potential development areas.

**Table 1. A summary of flood risk from difference sources at the site HA9**

<b>Type of Flooding</b>	<b>Flood risk</b>
Fluvial	<b>High</b>
Surface Water	<b>High</b>
Groundwater	<b>High</b>
Sewer	<b>Medium</b>

*End of report extract.*

-----

*Detail below is extracted from a Report commissioned by Holyport Preservation Society and is used with their agreement.*

The report is titled

**"EDGE OF SETTLEMENT HOUSING SITES, AREA HA9 MAIDENHEAD – TRIANGLE M4, A308(M) AND ASCOT ROAD\***

written by

**Dermot McCaffery MIHE MIRSO Highways & Transportation Consultant,**

dated **March 2014**

N.B. this report in its entirety has been provided to RBWM

## **Summary**

The Holyport Preservation Society has collected considerable traffic data for volume, speed and vehicle weight that has been supplied by RBWM on the lead up to these representations and where relevant that data will assist in providing a factual base to the representations made.

## LOCAL HIGHWAY NETWORK

The site is located close to the village of Holyport on the south side of Maidenhead town. The highway network in this vicinity is made up primarily by the M4 motorway at Junction 8/9, the A308(M) motorway spur, the A308 Maidenhead to Windsor Road and the A330 Maidenhead to Bracknell road. Due to the proximity of Maidenhead to the motorway network and the affluent nature of the conurbations most roads suffer extreme peak hour congestion. This is evidenced by the recorded poor air quality at the point where the M4 crosses over the A308 Windsor Road in the 2013 Air Quality Progress Report for the Royal Borough of Windsor and Maidenhead. The most up to date data for the air quality under the M4 bridge on the A308 which shows an increase from 54.7mg/m<sup>3</sup> (2010) to 61.13 mg/m<sup>3</sup> (2012). The National Air Quality Objective and EU limit is 40 mg/m<sup>3</sup>. As a result it is the recommendation of the RBWM as part of the Local Transport Plans and Strategies to reduce roadside emissions by adopting a range of measures to reduce the volume of traffic at peak time.

The M4 'smart motorway' (previously known as managed motorways) will commence in early 2016 to 2018 from Junction 3 to beyond Junction 12 and will effectively cater for the increase in motorway traffic for the next 20 years. As the motorway will be increased from six lanes to eight a peak time increase in traffic volume and associated pollution of 33.3% can be expected. This will add to the rising air quality pollution problems. The Borough's local roads (Windsor Rd, Upper Bray Rd/Priors Way and Holyport Rd) within the AQMA cumulatively contribute 16.35 µg/m<sup>3</sup> which is 57% of the local NO<sub>2</sub> concentration

29.34 µg/m<sup>3</sup> from traffic 'transitting' i.e. static and slow moving at the Holyport Road mini roundabout. The remaining 12.99 µg/m<sup>3</sup> which is 43% is attributable to the M4 contribution.

Most junctions suffer extensive queuing at peak times and this impacts directly to public transport frequencies and reliability. Future planned housing growth in the Warfield area of Bracknell Forest will add significantly to the existing traffic issues on A330 Ascot Road corridors the most direct route to the M4 motorway, A404 to the M40 and to Crossrail in just 4 years time.

Staff, pupils (500) and deliveries to and from the Holyport College opening this year will have also have a significant detrimental effect on the A330.

The inclusion and programmed provision of the Stafferton Way link at the south east of the town centre will make the A4/A308 route to the M4 more attractive by removing the current delays experienced by travelling through Maidenhead town centre. This will add more peak hour pressure to the Braywick roundabout with the "domino effect" on queuing on the A308 Windsor Road and A330 Ascot Road.

Bus services are generally hourly with 3 routes through the village. These services travel between Holyport and Maidenhead along the A308 which is heavily congested at peak times. This limits the convenience of these services as replacements to employment commuting by car.

## **AREA HA9 MAIDENHEAD - HIGHWAY AND TRANSPORTATION CONSIDERATIONS**

The site is located within the triangle formed by the M4, A308(M) and the A330 Ascot Road. The site has a total area of 25.5ha.

The *Area Analysis* document prepared by the Council considers that there could be the potential for a direct access to the A308(M) motorway spur. This is wholly unrealistic and contrary to Highway Agency policy. In the unlikely event that the HA agrees to a junction onto the A308(M) the dual carriageway nature of the motorway spur would mean that all vehicles ingressing or egressing the development would have a direct impact on the signal junctions at Junction 8/9 and at the Braywick roundabout. These junctions are operating significantly beyond their practical capacity at present and the scope for further capacity improvements is severely limited. It is more realistic to consider all access to this site being gained from the A330 Ascot Road. As such, there would be an immediate impact on traffic conditions in Ascot Road. At present, peak hour traffic is stationary for most of the period with queues extending south for 1.8km to Stud Green and regularly beyond the junction with Forest Green Road.

With the stationary traffic extending past the likely site access junctions there must be doubt about whether the junctions could operate satisfactorily and safely. Safety is a very real issue on the A330 and local residents have over many years been campaigning and have made representations with the support of local councillors to RBWM to implement a width restriction on HGV's using the A330 for the safety of residents, pedestrians and road users. *N.B. Updated 2016 HGV restrictions are now in place.*

The Braywick roundabout has limited options for capacity improvements. The developers of the site would have to demonstrate that suitable improvements could be delivered that would accommodate the additional traffic that would be generated by the development PLUS modelled traffic growth which would need to include the housing growth at Warfield and the opening of Crossrail both of which would be realised within the likely forecast years for the development.

This must all be without detriment to the prevailing traffic conditions on The A308(M) and A308 Windsor Road. The site is not accessible to non-car modes of travel. The congestion on the immediate network detailed above means that bus services are not frequent, un reliable and would not be convenient alternatives to car travel. At present, a single bus service travels along Ascot Road which runs 4 times per day. The Ascot Road presents significant severance between the site and the rest of the built up areas of Holyport and Bray where the nearest local facilities and primary schools are located. The lack of suitable alternative modes of transport would result in a car-dependant development which is contrary to National Planning Policy Framework objectives. This is a particular concern in the morning peak period which is heavily influenced by the "school run". The only local primary school for this catchment area is in Stroud Farm Road (2.1km). Access to this is only practical by car adding to the existing traffic problems, as it would be too far and/or too dangerous for children to walk or cycle to this school.

This additional car traffic would impact on the Braywick roundabout, Ascot Road to the south of the site, Holyport Road and the Holyport Road/Windsor Road approaches to the roundabout.

Any development would require additional access road junctions to meet with RBWM highway design guidance. Additional junctions would require the provision of a right turn lane in accordance with the Department for Transport's requirements as set out in the technical design memorandum TD42/95 "*Geometric Design of Major/Minor Priority Junctions*". The proximity of the site frontage to junctions on the east side of Ascot Road would limit the opportunities for achieving access junctions with suitable junction spacing. The heavily trafficked nature of Ascot Road would dictate that the geometric design elements of the access junctions should not be compromised. A roundabout is an alternative access junction design but this would be "land-hungry" and would be severely compromised by the levels of queuing from the Braywick roundabout.

## **Conclusion**

It is therefore my view that as a Highways and Transportation Consultant, I consider that development in this site is unsustainable.

*End of report extract.*

## **HA11: Land west of Windsor, north and south of the A308, Windsor.**

RBWM are proposing 650 residential units, together with educational facilities, a strategic public open space, a formal provision for football and rugby pitches and a multi-functional community hub.

The site measures 15.6 hectares and the adjoining housing is at a density of 25 dwellings per hectare, any development on this site cannot be denser than the adjoining development which would mean that there is a capacity for only 390 dwellings. If you then take into account the provisions detailed above for educational facilities, open space, sports pitches and a community hub this figure is reduced even further.

The local community feel very strongly that this site should be protected from any development as it is an essential part of the "Green Gap" that provides protection from the erosion of the boundaries between Windsor and Maidenhead. This "Green Gap" has been clearly identified in the Bray Parish Neighbourhood Plan which was recently adopted by Bray Parish Council. Policy 7.2.5 c of the Borough Plan states that "the contributions that the parcels make towards Green Belt purposes are considered to be modest." It is felt that this site is of major importance to the Green Belt and therefore does not meet these criteria.

In addition, this site is prone to flooding, particularly from surface water. Drainage is also an issue with problems already reported. There is also concern about the capacity of the local sewer network to handle development on this scale.

The development would result in the loss of good quality agricultural land (most of the land is classified as Grade 3 agricultural land). It would also impact on the rich biodiversity of the site.

The A308 and the Dedworth Road both operate at capacity and experience daily congestion. With planning permission already granted for developments along the A308 this can only get worse, exacerbating air pollution. The safety of pedestrians is also a concern.

The two garden centres are very important to the local community, providing employment (including for people with disabilities) and are regarded as assets to the area.

The key considerations listed in the Borough Plan include Heritage. It is important to note that this proposal would adversely affect the Grade II\* listed building on the site.

It is also important to note that the Cardinal Clinic is adjacent to this area, this is a well-respected Community Mental Health Hospital with 23 inpatient beds and a massive outpatient department. It has been in existence for 40 years and the location was chosen because of the peace and tranquillity of the surrounding area.

There is no spare capacity at local schools, doctor's surgeries, hospitals and even at the Leisure Centre.

Policy 8.6 of the Borough Plan relates to Small Businesses and states "...the small business sector is vital to the social and economic well-being of the Borough. Enabling small businesses to develop and thrive can strengthen the local economy and increase business vibrancy, as well as leading to greater employment opportunities for local people." The development of HA11 would deprive the area of two local employers (ie: the garden centres), it would impact heavily on the two highly-regarded Bed and Breakfast establishments which are adjacent to the site as well as the Cardinal Clinic as detailed above.

Rather than expanding the existing Ruddlesway estate to the west (towards Maidenhead), the opportunity to develop sites to the east should be investigated as these are not in the Green Belt. Perhaps further dwellings at Water Oakley should also be considered.

## **HA17: Tectonic Place, Holyport Road, Maidenhead**

RBWMs proposal for this site is 28 residential units.

This is currently a successful business park set in a residential area of Maidenhead, close to the Village of Holyport.

Concerns raised are regarding traffic from the new estate turning onto Holyport Road and enough parking for these 28 houses.

Designs of houses need to fit into surrounding area and ensure that trees are kept to mitigate any impact of new estate.

## **Site HA18 Borough Local Plan**

This site is subject to significant flooding from Bray Lake as this body of water is used to control water levels in the Thames and the surrounding area via sluices.

Any plans for this site should first consider infrastructure constraints and Green Belt consideration outlined in the attached Bray Infrastructure document and the Bray Parish Neighbourhood Plan.

Traffic on and access to and from the A308 (Windsor Road) will be a significant consideration when looking at any development on this site. Existing traffic congestion and pollution on the narrow A308 will need to be addressed. The location of the site dictates that all traffic generated by any development will enter and leave via this narrow section of the Windsor Road

Buildings should be low profile and designed to mitigate the effects of development on long distance views and their impact on the residents living on the main road

Any development should ensure that the public has access to Bray Lake and the current Permitted Path round the lake should be given Public Footpath status.

The bus service on this section of the A308 needs to be improved particularly if a hospice forms part of the development.

Any development of this site should include some public amenity. The Windsor Road area lacks a play area as the play area planned for the Witchford Gate development fail to materialise due to legal complications. The location would make the site a suitable location for an office for Bray Parish Council.

The further urbanisation of this part of the Windsor warrants a reduction in the 40-mph speed limit from the Braywick Roundabout to the junction with Monkey Island Lane



## Site HA23 Borough Local Plan

This site is subject to significant flooding from Bray Lake as this body of water is used to control water levels in the Thames and the surrounding area via sluices.

Any plans for this site should first consider infrastructure constraints and Green Belt consideration outlined in the attached Bray Infrastructure document and the Bray Parish Neighbourhood Plan.

Access to and from the A308 (Windsor Road) will be a significant consideration when looking at any development on this site. Existing traffic congestion and pollution on the narrow A308 will need to be addressed. The location of the site dictates that all traffic generated by any development will enter and leave via Monkey Island Lane and this narrow section of the Windsor Road. A roundabout should be constructed at the Monkey Island Lane/Windsor Road/Fifield Lane junction to facilitate traffic movement.

Buildings should be low profile and designed to mitigate the effects of development on long distance views and their impact on residents.

Any development should ensure that the public has access to Bray Lake and the current Permitted Path round the lake should be given Public Footpath status. A public cycle/footpath should be provided alongside The Cut from the Thames to Maidenhead, as this would give a safe route for residents to access Maidenhead by cycle or on foot. This path would link up with the Chapel Arches Project in central Maidenhead. This new path may well allow diversion of the existing national cycle path that currently goes the wrong way up a one-way street in Bray Village to access the River Thames.

The bus service on this section of the A308 needs to be improved.

The further urbanisation of this part of the Windsor Road warrants a reduction in the 40-mph speed limit from the Braywick Roundabout to the junction with Monkey Island Lane.

This site could only be used following the removal and remediation of the existing gravel washing facility owned by Summerleaze. The closure of this site would represent a planning gain, as it would reduce the number of heavy goods vehicles in the local area.

Development of this western side of Monkey Island Lane would give a definitive edge to the cherished Green Gap between Maidenhead and Windsor as described in the Bray Parish Neighbourhood Plan and further development eastwards towards Windsor would not be allowed.

# Policies

We have the following concerns with regards to the policies written in the Borough Local Plan and their impact on not just the Bray Neighbourhood Plan but also those of the other RBWM Parishes. Bray Parish Council would like to thank Margaret Morgan for giving her permission to include the findings of the Ascot Sunninghill & Sunningdale Neighbourhood Plan Delivery Group.

## **Too many policies defined as Strategic, undermining the value of having Neighbourhood Plans (see BLP page 15 - List of Policies)**

A total of 28 policies are defined by the Borough as being Strategic, leaving 29 that are not. We challenge that all those defined as "strategic" truly are in terms of their wording and whether they need to be. This is important as national policy guidance states that BLP strategic policies override NP policies in the event of there being any degree of conflict between them. "Conflict" can be as simple as a difference in interpretation.

This strategy by the Borough to define so many policies (which include a lot of detail) as strategic undermines the value of having Neighbourhood Plans and is against Localism.

## **Design policy SP3 is too detailed and will undermine Neighbourhood Plan policies (Policy SP3, especially sub-para 5 and paragraphs 6.2.5 and 6.2.11; comparison with policy SP7)**

This policy is defined by the Council as a strategic policy which means that, in the event of any conflict in interpretation between it and any Neighbourhood Plan policies, this BLP policy will prevail.

***We challenge that its current wording is strategic*** – it is far more detailed than a strategic policy should be and will result in conflicts in interpretation that developers and their consultants will seek to take advantage of. ***This policy will totally negate many of the design policies in all Neighbourhood Plans.***

***We ask that all detail is removed from this policy to make it genuinely strategic. And that para 5 which refers to a Borough Design Guide Supplementary Planning Document is deleted entirely to avoid such SPD from being given undue weight.***

It is also interesting to note that while reference is made to Neighbourhood Plans in paragraph 6.2.5, there is no related mention in the Policy itself; whereas the reference in paragraph 6.2.11 of the BLP regarding the need to engage in consultation is then reflected in sub-para 4(b) of policy SP3.

Note further that Policy SP7 on Countryside Character **does** refer to Neighbourhood Plans – so why does not policy SP3?

**Policy HO5 Housing Layout and Design too detailed and will undermine Neighbourhood Plan policies (Policy SP3, especially sub-para 3)**

Policy HO5 is also designated as being "strategic" and hence will override all NP policies. Much of what is in it is detail which should not be considered "strategic".

We are especially concerned about sub-para 3 which refers, once again, to the Borough-wide Design SPD. While we recognise that an SPD only provides "guidance", including it as part of the policy gives it added weight. Meanwhile, there is no mention in the policy OR in any of the related text to the importance of NP policies.

***We ask that all detail is removed from this policy to make it genuinely strategic. And that para 3 which refers to a Borough Design Guide Supplementary Planning Document is deleted entirely to avoid such SPD from being given undue weight.***

**Insufficient evidence that required infrastructure can and will be provided (Paras 15.1.1, 15.2.1, 15.7.3, 15.7.7, 15.7.8, 15.9.3 and Policy IF3; para 15.11 and Policy IF4)**

Perhaps not strictly and directly related to undermining of Neighbourhood Plans but we are also deeply concerned that there is very little available yet that sets out what infrastructure will be delivered to cope with all this development.

Paragraph 15.1.1 does say that "the timely provision of suitable and appropriate infrastructure is crucial to the wellbeing of the Borough's resident population, those who visit, provide services and those who invest and work in the Borough. Infrastructure has not always historically kept pace with development and there are some parts of the Borough where infrastructure demands are currently near to or at full capacity". And we agree with every word of this! But this BLP does not secure any satisfactory solutions.

Para 15.2.1 refers to the "Infrastructure Delivery Plan" which will define the infrastructure required. But this has not yet been provided. How can anyone evaluate whether this draft BLP is robust and viable without a full understanding of what infrastructure will be needed to make the proposed development sustainable AND how the funding will be provided to deliver it.

***We challenge the soundness of this BLP on the grounds of insufficient evidence on how the needed infrastructure will be provided.***

Paragraphs 15.7 generally and specifically 15.7.3 sets out the pressures our transport networks are under. But policy IF3 does little to address these.

Paragraph 15.11 sets out the Borough's strategy on developer contributions and policy IF4 para 2(c), 2(d), 3, 4 and 5 set out what developers will be expected to fund. This however still does not address the problems arising from the cumulative effect of so much new development. I repeat again, without an Infrastructure Delivery Plan, this BLP cannot be evaluated for soundness.

### **Flawed transport plan (paragraph 15.7.3, 15.7.7 and policy IF3)**

Para 1 of policy IF3 refers to a Transport Strategy in “the Local Transport Plan”. This however is not listed among the Supporting Documents to this consultation; considering its importance, it should have been. There are serious flaws in this LTP, which make reliance on it for the BLP policy unsound:

- It was produced in 2012, at which time the Council was working on a draft BLP that forecast a much lower level of housing need. This Local Transport Plan is now materially out of date.
- Many of the allocated sites in the BLP only came forward **after** this LTP was produced, including for example Maidenhead Golf Course, the land in Ascot Centre and Sunningdale Park
- In paragraph 3.6.3 a list is provided of the issues deemed as most important by residents and stakeholders, the top two both being about traffic congestion. Throughout the entire 100 pages of this Transport Plan only one policy SEG6 Network Management even refers to the need to improve the efficient operation of the local road network. And even this doesn't refer to the challenges of accommodating a 25% increase in households across the Borough, which is what the BLP is proposing
- Also, this impacts on residential parking. Current parking standards are woefully inadequate, resulting already in high levels of overspill on-road parking, which further exacerbates the traffic congestion. There is nothing in the BLP to address this and we are reliant on another yet again unseen “Parking Supplementary Planning Document” for what will be proposed.
- Above all however is the fact that this Local Transport Plan is rich in strategy and very poor indeed on any detail on how it will be implemented. The BLP's policy relying on it becomes meaningless.

***BLP Policy IF3 on Transport is woefully inadequate and does not sufficiently address the issues it needs to***