



Bray Parish Council

Briefing notes for local residents wishing to respond to the RBWM Regulation 19 Borough Local Plan Consultation

Bray Parish Council is providing these Briefing Notes to Residents. They set out our views on this current Reg 19 Borough Local Plan. We are encouraging everyone to respond to the consultation and to use these notes for guidance in the preparation of their submission.

The RBWM Reg 19 Consultation Submission version of the Borough Local Plan can be downloaded at: https://www3.rbwm.gov.uk/info/200414/local_development_framework/594/emerging_plans_and_policies/2

You may also wish to refer to some Frequently Asked Questions which have been prepared by RBWM Residents Action Group (RRAG), available to download from <http://rbwmresidentsactiongroup.co.uk/onewebmedia/Responding%20to%20the%20Reg%2019%20consult%20FAQs.pdf>

IMPORTANT NOTES:

- There is NO restriction to what you can comment on in relation to this Plan. Anyone can comment on ANY ASPECT of the Plan.
- If you submitted comments under the Reg 18 Consultation, you should be aware that these will NOT be forwarded to the examining inspector. If you feel that your comments made under Reg 18 have not been taken into account by RBWM in the Reg 19 version, you should send them in again. Only submissions to this Reg 19 consultation will be seen by the inspector.
- **It is critical that all comments you send in include a reference to the specific section(s), paragraph(s) and/or policies in the Plan they relate to.** All the Notes below do so.
- The comments you make on each topic **will be considered to be one "Representation"** – that is the term/description that the Borough uses.
- You can make as many Representations as you wish.
- You can choose to comment on any one, more or all of the topics we suggest below, and also to add as many others as you wish.
- It would be best if you could paraphrase your comments, and if you have personal examples that **support the argument, please add these as they will contribute to the "supporting evidence"**.
- **The closing date for responses is 5pm on Wednesday 27 September 2017.** Submissions received after this will not be accepted.

How to respond

Unfortunately, both the online portal and the Representation Form are extremely difficult to use and the Borough's "guidelines" are not helpful. We suggest the easiest way for you to prepare your submission is as a letter, which you can then email or post to the Borough.

Send via email to: blp@rbwm.gov.uk

Or via post to: FREEPOST RBWM PLANNING POLICY

You may also wish to copy your local Councillor(s) in your response. Our local Councillors are:

RBWM Bray Ward Councillors

David Burbage	Kimbers Edge, Kimbers Lane, Maidenhead SL6 2QP cllr.burbage@RBWM.gov.uk	01628 623699
David Coppinger	Titch Cottage, Bartletts Lane, Holyport. SL6 2NB cllr.Coppinger@RBWM.gov.uk	01628 639523
Leo Walters	Little Tudor, The Green, Holyport. SL6 2JA Cllr.walters@rbwm.gov.uk	01628 627967

Please make sure you title your email or letter:

“Representations on BLP Reg 19 Submission version”

Introduction

We suggest you may wish to start your submission by giving a little background on:

- Who you are
- Resident where and for how long
- And/or working here
- Local connections
- Any relevant *personal* experiences such as traffic congestion, children not able to afford a house locally, shortage of school places, GP surgeries, local flooding or sewerage issues.

Briefing Notes

REPRESENTATION: Pro development, Pro having a BLP but Against this BLP

**Reference: The BLP as a whole, AND
Section 1 “Introduction to the Pre-submission BLP”**

Local residents recognise the importance of the Borough having an up to date Borough Local Plan, against which new planning applications can be determined.

We need a Plan that includes a vision for our area, both for our two larger towns, Maidenhead and Windsor, and for our villages.

We are **pro** development and agree we need more housing, especially homes ordinary people can afford – houses for our children and for key workers like teachers and care and hospital workers. But we also need a vision for our economy, to ensure we continue to provide jobs locally and minimise the need to commute. And, critically, we need a Local Plan that is infrastructure rich to support this development.

We are **strongly against THIS Borough Local Plan because it doesn’t deliver against any of the** above. It has been produced by the Borough without proper consultation and engagement with local communities and contrary to all the principles of Localism. It fails to support Neighbourhood Plans – both adopted ones and those being developed. In fact, we believe it undermines them and narrows the scope for future Neighbourhood Plans or for reviewing existing ones.

This Plan is UNSOUND and we OBJECT to it.

REPRESENTATION: RBWM failed to properly consult or engage with local residents

Reference: Statement of Consultation (May 2017)

There was some consultation in the early stages of the Plan (in 2012-2014), which included a First Preferred Options consultation in January to March 2014.

A planned Second Preferred Options consultation was envisaged but never took place.

The Reg 18 consultation in December 2016 (more than 2½ years later) was the first opportunity residents had to read and comment on an emerging Plan. The policies and the site allocations in it bear virtually no relationship to those earlier consultations.

We were allowed 6 weeks in which to digest and comment on the Reg 18 Plan, which included the Christmas period. Despite numerous representations from Parish Councils, Neighbourhood Plan groups, other local groups and residents generally, RBWM refused to extend the time available.

We are told that all our Representations to the Reg 18 Plan were assessed as part of the process of arriving at this Reg 19 version. Sadly, with the one exception - the de-classifying of one Design policy to be non-strategic - **we don't see that ANY of the local communities' comments** have been taken into account; and no valid reasons have been given why.

We find that the Reg 19 Plan is worse than the Reg 18 version and totally fails to reflect the aims and aspirations of local residents.

Local Plans are supposed to be produced through **engagement** - and not just consultation – with local communities. This Plan has not been prepared in this way. It is against all the principles of Localism, promoted by government.

REPRESENTATION: BLP undermines Neighbourhood Plans

Reference: pp 9-10 List of Policies, AND
Paragraph 1.5 Neighbourhood Plans, AND
Section 7.4 Policy HO1 Housing Development Sites, AND
Appendix D Housing Site Proformas

Out of a total of 46 policies, 24 have been defined by the Borough as **“strategic”**. This means that they will override any Neighbourhood Plan policies on those topics, dramatically curtailing the ability of Neighbourhood Plans to influence the type and shape of development in their areas.

There is no compelling rationale for many of these policies to be defined as **“strategic”** and much of the detail contained in, for example, *HO2 Housing Mix and Type*, *ED3 Other Sites and Loss of Employment Floorspace*, *TR6 Strengthening the Role of Centres* and many others, all deemed **“strategic policies”**, will severely limit what Neighbourhood Plans can deliver for their areas.

We are specifically concerned that the allocated Site Proformas are specifically referenced in policy HO1 which is strategic. This totally undermines any opportunity for Neighbourhood Plans to influence the nature of development on these sites.

REPRESENTATION: BLP does little to deliver Affordable Housing

Reference: Section 7.7 Affordable Housing, AND
Section 7.8 Policy HO3 Affordable Housing, AND
Appendix D Housing Site Proformas

The Borough has been very vocal in its publicity about the fact that this Plan will deliver the affordable housing our borough so desperately needs. But we don't see this secured through policy.

The statement that a **“minimum requirement of 30% affordable housing units”** will apply to all new development is no more than a statement of hope. Delivery of this is subject to it not making the development unviable. It is a fact, supported by recent history, that in an area like ours with high land values, it is very rarely possible to fund 30% affordable housing on a new development.

We are especially concerned that none of the Site Proformas – not even those for sites which the Borough owns – include **Affordable Housing as a Requirement; it's not even listed as** a Key Consideration.

We challenge whether this Plan can deliver anything like the 30% Affordable Housing indicated as part of the Objectively Assessed Need (OAN).

REPRESENTATION: Object to Design policy

Reference: Section 6.4 Design, AND
Section 6.5 Policy SP3 Character and Design of New Development

We welcome the fact that policy *SP3 Character and design of new development* is now classified as a non-strategic policy. This will allow Neighbourhood Plans to add further granularity to local area character through their own design policies.

However, we OBJECT to many of the changes that have been made between Reg 18 and this Reg 19 version, all against much of what local communities said in their consultation feedbacks:

Reg 18 Residential Gardens policy has been removed and, contrary to what the Borough states in the Table of Changes, it has NOT been replaced within SP3. There are now no constraints at all to control development involving residential gardens, which we totally disagree with.

The BLP now contains no reference at all to Parking requirements, a major concern to local residents. We have highly trafficked roads and on-street parking has safety implications as well as resulting in increased gridlock. A requirement for sufficient parking should be included as policy.

Reg 18 version, policy SP3 paragraph 4(b) included a requirement for Developments to be designed in partnership with local communities. This has been removed from the Reg 19 version, and should be reinstated.

REPRESENTATION: Flawed process in how sites were selected and decisions regarding Green Belt

**Reference: Sustainability Appraisals November 2016 AND May 2017, AND
Evidence base to support site selection process AND
Section 7.4 Policy HO1 Housing Development Sites**

We object to the way in which sites have been selected for inclusion in the Plan, in particular the sites earmarked to come out of Green Belt – 26 sites out of a total of 48 that have been allocated are currently in Green Belt.

National government repeatedly tells us that Green Belt should be protected; and that building on it, even to provide much needed housing, should only be a last resort.

We challenge that the Borough has fully explored all possible brownfield sites or other alternatives before deciding to allocate these sites in the Green Belt, simply because these were being promoted (by the Borough themselves in some instances).

There is total lack of transparency over why some sites have been chosen over others, and why others have been left out. And why some sites were consulted on and some were not.

REPRESENTATION: Challenge decision to deliver 100% of Objectively Assessed (Housing) Need (“OAN”)

**Reference: Section 7.2 Housing, AND
Section 7.3 Housing development sites, AND
Section 7.4 Policy HO1 Housing Development Sites**

Why has the Borough not considered making a case for a Plan that delivers less than the 100% Objectively Assessed Need (OAN)? Government policy makes it clear that this is an option in circumstances where there are major mitigating factors such as Green Belt constraints, risk of Flooding, Conservation areas etc., all of which apply to our Borough.

The Council seem to have based their decision to deliver 100% of OAN largely on advice given verbally by an Inspector at an informal meeting for which no minutes exist. This is not an acceptable way in which to reach such an important decision.

REPRESENTATION: Plan does not provide for necessary infrastructure

**Reference: Section 4.3 Objectives, AND
Section 14.1 (Infrastructure Context), AND
Section 14.6 Local Transport Plan, AND
Section 14.18 Utilities, AND
Section 14.19 Policy IF8 Utilities, AND
Infrastructure Delivery Plan (supporting evidence)**

The National Planning Policy Framework (NPPF) is clear that a Plan must provide for infrastructure needs alongside new development and this Plan fails to do so.

Many of the infrastructure problems faced by our area – such as road congestion, lack of parking, need for new schools, sewerage and drainage being at capacity – are correctly identified in the Plan. But they are not being addressed. Other critical infrastructure issues are not even mentioned, for example, constraints imposed by capacity of current river crossings.

The Infrastructure Delivery Plan is strong on intent and hope but singularly weak on plans and deliverability.

This BLP cannot be found sound without an infrastructure plan that will ensure that the proposed development will be sustainable.

The Local Transport Plan relied on for the Council's current transport policy dates back to July 2012, which predates both the calculation of total OAN and the identification of allocated sites. This is unacceptable as a basis for a sustainable Plan.

REPRESENTATION: Employment policies inadequate

Reference: Section 8.3 Policy ED1 Economic Development, AND
Section 8.7 Employment sites

Wording of Policy *ED1 Economic Development* is more a statement of objectives than a planning policy.

In many parts of the Borough, the main employment sites people are crying out for are light industrial - eg spaces for small service businesses. There is nothing in the Plan that encourages or plans for the provision of such spaces.

There is no supporting evidence that the proposals for intensification of use on existing sites is a viable option; nor have the likely implications on traffic, access and parking even been considered.

REPRESENTATION: Environmental policy not fit for purpose

Reference: Section 12.5 Policy NR2 Trees, Woodlands and Hedgerows, AND
Supporting document “Tree and Woodland Strategy for the Borough”, AND
Section 12.8 Habitats and designations, AND
Section 12.7 Policy NR3 Nature Conservation

Policy *NR2 Trees, Woodlands and Hedgerows* relies on **the Council's** Tree and Woodland Strategy, but this Strategy says nothing that relates to Trees in a planning context. Also, the Strategy includes nothing about the connectivity of natural habitats (Green Corridors).

Paragraph 12.8 regarding valuable wildlife habitats may read well but none of this is included in any policy. The section should relate to **NR3 Nature Conservation (which is another “strategic policy”) but this makes** no provision for the protection of Local Wildlife Sites – in fact, it **expressly excludes them by referring to “designated sites of international** and national **importance” and does not include “of local importance”**. Policy NR3 should be extended to include **“sites of local importance”**.

REPRESENTATION: A weak and ill-conceived Plan which we object to

Reference: Page 1 Introduction, AND
The Plan as a whole, AND
Supporting evidence base

We are deeply concerned about this Borough Local Plan. Its impact will be felt not just by us but by our children and grandchildren for the next 20 years. It is a weak and ill-conceived Plan, produced without appropriate consultation, without a robust process and, in many cases, with out of date evidence.

We are strongly against it and can only think that any examining inspector it is presented to will find it UNSOUND.