

# **RBWM Borough Local Plan 2013-2033**

## **Submission Version Incorporating Proposed Changes October 2019**

### **Submission from the Bray Parish Council**

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## **1. Introduction**

1.1 This submission to the Royal Borough of Windsor and Maidenhead (RBWM) Consultation on the Submission Version of the Borough Local Plan 2013 - 2033, incorporating Proposed Changes October 2019, is made by the Bray Parish Council. It has been prepared on behalf of the Parish Council by Peter Lerner MA (Oxon), MRTPI, Chartered Town Planner.

1.2 This submission should be seen as a companion and supplement to the Parish Council's Regulation 19 Submission. The Parish Council is also one of the 13 Organisations who have combined to provide substantial evidence on the Borough Local Plan at the Regulation 19 Consultation, at the Examination, which commenced in June 2018 and was subsequently paused, and also at the current Consultation on the Proposed Changes. This evidence is complementary to the evidence submitted on behalf of the 13 Organisations, and is intended to focus on issues directly affecting Bray Parish.

1.3 Bray is a Parish within the Royal Borough of Windsor and Maidenhead, between the towns of Maidenhead and Windsor, and to the south west of the River Thames. It includes the villages of Bray, Holyport, Fifield and Oakley Green, and is set in the Green Belt with important gaps between the villages, and between the Parish and the towns of Maidenhead, Windsor and Bracknell.

1.4 It is traversed by the national M4 Motorway, and by two busy and often congested A-roads, the A308, linking Maidenhead and Windsor, and also linking directly westwards with the M4, via the A308(M); and also the A330, which runs southwards towards Ascot and the major employment centre of Bracknell.

1.5 The Parish Council involves itself fully in local planning matters. A Neighbourhood Plan has been commenced, but work was halted in 2018 in order to allow for RBWM's Borough Local Plan process to be completed.

## **2. Key Points in this Submission**

2.1 The key points in this response to RBWM's BLP Consultation reflect the Parish Council's planning priorities which support their desire to preserve and enhance their communities' health, wellbeing and quality of life.

2.2 These are:

- Preservation and enhancement of the Green Belt, together with the maintenance of green gaps between settlements
- Calming and reducing traffic and congestion on the busy main roads and local roads
- Reducing noise pollution, and improving air quality
- Reducing the risk of flooding

2.3 This response will also examine the individual characteristics of the four sites in the Parish which are currently in the Green Belt but are now, in this update of the Plan, allocated for development.

### 3. The Green Belt

3.1 The establishment and continuing defence of Green Belts is one of the greatest success stories of the post-war English planning system. Green Belt policies are universally understood and largely supported, particularly by communities, such as those in Bray Parish, which identify as villages, defined by their separation from nearby towns by rural, green space.

3.2 Within the Parish of Bray, countless planning applications have been determined in accordance with the established policies of RBWM for the Green Belt, and their decisions have been endorsed, on appeal, by the various Secretaries of State and their Inspectors. The clarity and fairness of the policies for Green Belts are appreciated by most. This is an area of policy where the Parish Council and the Royal Borough are rarely in disagreement; as recently as October 2019, the Parish and Borough Councils were seen to be on the same side in vigorously opposing, at a Public Inquiry, a proposal to develop 21.75 hectares of Green Belt land at Lodge Farm, Holyport.

3.3 Paragraph 133 of the National Planning Policy Framework (NPPF) defines the fundamental aim of Green Belts as being *to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.*"

3.4 The five purposes of Green Belts are set out clearly in the NPPF at paragraph 134. These are:

- a) to check the unrestricted sprawl of large built-up areas;*
- b) to prevent neighbouring towns merging into one another;*
- c) to assist in safeguarding the countryside from encroachment;*
- d) to preserve the setting and special character of historic towns; and*
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*

3.5 Planning practice and case law make it clear that for land to fulfil a Green Belt function, it must meet one or more (but not necessarily all) of those five purposes.

3.6 Five sites in the Green Belt, within Bray Parish, are allocated for development, in the current version of the Borough Local Plan. These are:

- AL14: The Triangle Site - 25.70 hectares to be developed for general industrial / warehousing uses;
- AL21: Land west of Windsor, north and south of the A308 - 27.76 hectares to be developed with approximately 450 houses;

- AL22: Squires Garden Centre - 0.74 hectares, to be developed with approximately 39 houses; and
- AL26: Land between Windsor Road and Bray Lake - 3.99 hectares to be developed with approximately 100 houses.
- The fifth site is the southern part of the extensive Site Allocation AL13, lying to the south of Harvest Hill Lane. This area was, in the previous iteration of the Plan (BLPSV) allocated as HA7, Land south of Harvest Hill Road, totalling 25.58 hectares and shown for approximately 380 houses. The whole of the new allocation AL13, including the land to the north, totals 89.93 hectares and is allocated for approximately 2600 houses with schools, a local centre and additional community provision.

3.7 The Plan (Appendix A) indicates that all of first four sites are proposed consequently to be removed from the Green Belt. It therefore proposes that a total of 58.19 hectares of Green Belt land, within the Parish, are developed, with approximately 589 houses, and unspecified quantities of general industrial and warehousing buildings and uses. The portion of site AL13 which lies within the Parish adds several hundred more houses and a further 25.58 hectares of land, also currently within the Green Belt and proposed, in the Plan, to be removed from it. This brings the total area of Green Belt land, within the Parish, which is proposed to be developed, to 83.77 hectares.

3.8 National policy for the protection of green belts is coherently expressed in Chapter 13 of the NPPF, which not only emphasises the openness and permanence of Green Belt land (para. 133), and gives direction on the purposes of Green Belts (para. 134), but also makes it clear that generally new building is considered inappropriate in Green Belts (para. 145), and that inappropriate development in Green Belts is harmful and should not be approved (para. 143). The NPPF makes it clear that inappropriate development in the Green Belt can only be acceptable if “very special circumstances” are demonstrated.

3.9 Paragraphs 136 to 139 of the NPPF give specific advice to local planning authorities who are considering alterations to the boundaries of Green Belts. These paragraphs once again emphasise the need for permanent Green Belt boundaries, and the requirement for local planning authorities to clearly define and explain the exceptional circumstances that lie behind their desire to remove land from the permanently established Green Belt.

3.10 Four of the proposed development sites in the Green Belt are allocated for housing (58.07 hectares; 969 houses\*). What are the exceptional circumstances, if any, which would lead to development, previously understood to be inappropriate and harmful, taking place on them? (\* This figure assumes that the capacity of that part of Allocation AL13 which lies within the Parish is approximately 380 houses, as indicated in the former BLPSV allocation HA7).

3.11 It is well known that the Royal Borough has, in recent years, had difficulty meeting the national target which requires at least 5 years’ supply of housing land to be available. As a response to this situation (which is a reflection both of the pressure to build houses in the Home Counties and the constraints on development

within the Royal Borough), the Council took the bold step of proposing to meet 100% of its Objectively Assessed Housing Need (OAHN) for the Plan period (2013 to 2033) in the version of its Borough Local Plan (BLPSV) which was submitted for Examination during 2018.

3.12 The latest Proposed Changes document goes beyond that percentage. While the OAHN remains at 14,240 dwellings, the changed Plan now sets out a Housing Supply Position (Table 7.1 and paragraph 7.2.10) that totals 16,435 dwellings, which is 2175 more than that proposed to be provided for (14,260) in the BLPSV. The proposed provision is now 15.4% greater than the number produced by the OAHN. This means that the Plan proposes to build over 2,000 new houses, by 2033, for which no actual need has been established.

3.13 Given the lack of actual need to build houses on 58.07 hectares of land in Bray Parish (which would provide almost one half of the total of the proposed over-supply), RBWM cannot claim that there are exceptional circumstances to justify arbitrarily removing these three parcels of land from the Green Belt.

3.14 It cannot be argued that the four sites do not make a contribution to the five green belt purposes. Somewhat grudgingly, the Council's Sustainability Appraisal (SA) states that AL21 "makes only a moderate contribution to Green Belt purposes", that the contribution of AL22 is "moderate", and that AL13 and AL26 are "low to moderate". It is difficult to find any justification via a proper Green Belt Review for these assessments, although it is still clear that a contribution is made by these sites to the Green Belt purposes in the eyes of the Council, even if this is considered to be only "moderate" or even "low".

3.15 The Parish Council disagrees with these subjective assessments, and believes that if all sites deemed to make "only" low or moderate contributions to the Green Belt were allowed to be developed, this would make a mockery of the principle of permanence of Green Belts. It is the Parish Council's case that each of the three sites helps to check "unrestricted sprawl", each helps to prevent the merging of settlements (a key concern of the Parish Council), and each assists in safeguarding the countryside from encroachment. Sites AL21 and AL22 additionally help to preserve the setting and special character of the historic town of Windsor.

3.16 Site AL14 is a large site of over 25 hectares which is newly allocated (a change from the 2018 BLPSV) for industrial and warehousing development. The Council have recognised and acted upon criticism levied during the first three days of the Examination, that their Policies for employment may have been insufficient and inadequate, by allocating for development a large area of Green Belt which has the advantage of being located close to the national highway network. Conversely, however, it is not located in any close proximity either to the national rail network, nor to the major settlements from which its employees will have to travel, and one of the Council's major objections to this allocation, in addition to its Green Belt location and function, is the additional traffic which it will attract and generate on local roads.

3.17 Although the SA once again describes this land as only making a "moderate contribution" to the Green Belt purposes, the Parish Council is certain that it contributes to purposes a, b and c. Purpose e is also relevant, in that an alternative

to providing this quantity of employment on Green Belt land, could be found were the Council to make greater efforts to encourage “the recycling of derelict and other urban land”.

3.18 RBWM’s assessments of these sites’ contributions to the purposes of the Green Belt would carry considerably more weight if the Council had carried out a full Green Belt Study, as advised by the Inspector who examined their ultimately failed Plan in 2007. This work has not been carried out over the 12 years which have since elapsed, and the Parish Council strongly disagrees with the Council’s assessments, which it considers are subjective and lacking in robustness.

3.19 The individual characteristics of each of the sites are further described in sections 6 to 9 below.

#### **4. Traffic and Congestion**

4.1 The Parish Council’s very detailed submission to the BLPSV in 2018 described the characteristics of the two major roads - A308 and A330 - which serve their village communities and provide linkage to the larger settlements of Maidenhead, Windsor, Bracknell and beyond. These roads also serve through traffic which already causes serious congestion at a number of locations, as described in that submission.

4.2 The levels of traffic, and therefore congestion, are set to increase given both the quantum of new development proposed up to 2033 in the Royal Borough, and the amount of new development proposed to take place in nearby Boroughs and Districts, some of whose residents or employees will make use of the roads through Bray on their trips for work, health, shopping or leisure.

4.3 The Council’s Local Transport Plan, dated July 2012 and covering the period 2012 to 2026, is very outdated. The base year for the Council’s Strategic Highway Model is 2016. A number of major site allocations have been put forward in other Boroughs’ Local Plans since those documents were produced, which are now adopted or under consideration. Via Duty to Co-operate and normal cross-boundary consultation, it would be expected that the Royal Borough’s transport and traffic planning would be constantly updated with input from neighbouring highway authorities.

4.4 Similarly, given the future importance of Crossrail and its likely impact on people’s travel habits over a wide regional area, and the likelihood of major expansion taking place at Heathrow, there should be a good expectation that the Council, in its transport planning alongside the BLP, has taken all of this into account and has either made plans (and secured funding) for significant transport improvements in order to accommodate the increased activity, or made solid and radical proposals to reduce, significantly, use of the private car.

4.5 The Council’s updated Infrastructure Delivery Plan (October 2019) at paragraph 3.1.4 identifies 41 transport infrastructure projects which have been “identified to support the BLP-SV”. Three of these, which are strategic schemes put forward by national bodies (A1, A2 and A3), are given high priority. The remainder are given

medium, low or no priority, which is remarkable given the scale of development proposed in the BLP and the fact that, in 2019, almost one third of the Plan period has already elapsed. Funding, according to the Table at paragraph 3.1.4 is not in place for the great majority of these projects, although “local funding” (amount and source unspecified) is suggested for a few. The local highways projects, other than the proposals to build car parks, are either at “initial design stage” or “feasibility stage”, which is a shocking situation and provides no certainty whatsoever that proper thought has been given to resolution if the major problems of traffic and congestion which exist on local roads today, let alone the mitigation of the increases which follow from proposed new developments.

4.6 In addition to this, at a more local level, the Strategic Highways Study at Table 2.16 identifies a number of “Failing junctions” within the Royal Borough and suggests possible mitigation strategies. Beneath this table, at paragraph 2.5.4, there is an additional list of schemes for which “no viable solution” can be identified or for which there is “no funding currently available”.

4.7 Many of the projects listed in the IDP and Strategic Highways Study affect junctions or roads which are within or pass through Bray Parish, in particular the heavily used A308 and A330. It is insufficient for the Council to accept that there are problems requiring mitigation, and “failing junctions”, and then to give no certainty, as part of the BLP, that anything will be done.

4.8 Some confidence in the Council’s ability to deal with the serious traffic issues around the A308 Corridor came with an announcement, by the Council, on 6<sup>th</sup> March 2018 that

*“half a million pounds’ worth of funding to help develop infrastructure to match regeneration and the emerging Borough Local Plan has been awarded to the Royal Borough and its neighbours.*

*The £547,000 one-off grants will allow councils to pay for a series of studies aimed at supporting economic growth and setting out exactly how future needs such as housing and infrastructure would be met.*

*The grant includes targeted funding to outline options for the A308 corridor to ensure the transport network is fit for purpose as the area’s population grows.”*

4.9 This funding was obtained from the Government’s Planning Delivery Fund. No results from this options study for the A308 corridor are available, and indeed it is understood that work on it only commenced in Autumn 2019. The chance for this Government funded study to inform the BLP has therefore, sadly, been entirely missed. The Parish Council is not at this stage clear as to whether or not this Study will be carried out by an independent Consultant, as had been promised by the Council.

4.10 Paragraph 102 of the NPPF concisely describes how the Government expects that effective land-use planning will be accompanied by careful transport planning. It states:

*“Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:*

*a) the potential impacts of development on transport networks can be addressed;*

*b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised - for example in relation to the scale, location or density of development that can be accommodated;*

*c) opportunities to promote walking, cycling and public transport use are identified and pursued;*

*d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account - including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and*

*e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.*

4.11 It is, unfortunately for local communities, evident that transport issues have been considered only as an afterthought to proposals for site and land use allocations in the Plan, and that despite the importance of planning for future infrastructure, this work is neither costed, funded, or ready for implementation.

4.12 The traffic implications of individual site allocations are further examined below at sections 6 to 9.

## **5. Noise and Air Pollution**

5.1 In the current, Consultation version of the BLP, there are a number of Policies relating to environmental protection. Policy EP1 is an over-arching Policy relating to Environmental Protection, and clearly states that “development proposals will only be supported where it can be shown that ... they do not have an unacceptable effect on environmental quality”. It further requires that “residential amenity should not be harmed by reason of noise, smell or other nuisance” (which the Parish Council would expect to include air pollution).

5.2 Paragraphs 13.4.1 to 13.4.5 of the Plan, together with Policy EP2, relate to Air Pollution. It requires that development proposals “will need to demonstrate that they do not significantly affect residents”; that proposals “must contain appropriate mitigation measures”, and that the matter of good air quality is key to “reducing the likelihood of health problems to residents”.

5.3 Paragraphs 13.8.1 to 13.8.3 of the Plan, and Policy EP4, similarly relate to Noise pollution, proposing appropriate standards and mitigations for developments where there are unacceptable levels of noise, and helpfully stating, in paragraph 13.8.3 that environmental noise “is considered to be or is likely to be significant” within 100 metres of all A-roads and motorways. It has already been identified that Bray Parish is traversed by the M4 and two busy A roads, A308 and A330, and it is interesting to note that each of the four sites proposed for development, within the Parish in the



current Plan, abut either a motorway or an A-road, and that the four residential sites are within the exceptionally traffic-heavy A308 corridor.

5.4 The Council's Sustainability Appraisal is very clear on matters of air quality. It indicates in Table 7.1 that RBWM experiences higher rates of mortality associated with long-term exposure to air borne particulates, than the average for the South East England, or the average for England as a whole. The text in Box 7.1 of the SA spells out the potential implications of the BLPSV for human health as follows:

*"The proposed development within the BLPSV-PC would be likely to situate approximately 14,896 new residents within 200m of a major road... The proposed development in these locations would be likely to situate new residents in areas where air quality is below the National Air Quality Objectives. These could potentially have negative impacts on the health of local residents, with children, the elderly, and those of poor health identified as the most vulnerable.*

*The proposed development within the BLPSV-PC would be likely to increase the volume of traffic within the Plan area. This would result in an increase in traffic-related emissions and consequently, further decrease the air quality within RBWM. This would be expected to have negative health implications for current and new residents."*

5.5 Paragraph 7.3.1 of the SA, however, records that policies in the BLPSV-PC "aim to prevent the reduction of local air quality and seek to mitigate the impact of air pollution". Policies also "aim to promote sustainable transport use and reduce residents' reliance on personal car use".

5.6 Box 7.2 of the SA highlights the Site Allocation Proformas where the Plan suggests positive measures to mitigate the likely reduction in air quality. Although AL21 straddles the A308 and therefore at both sides of the road lies within 100 metres of it; although AL22 lies wholly within 100 metres of the A308 (and is at a roundabout junction where levels of air pollution from traffic are likely to be increased; and although half of AL26 is within 100 metres of the A308, there are no suggestions or recommendations regarding air quality for any of the three sites, indeed it is not raised as an issue. The part of AL13 which lies within the Parish is in close proximity to the A404(M) and A308(M), and although the now deleted Allocation HA7 did indicate noise and air quality as a "key consideration" for the site, these constraints are not referred to in the Proforma for AL13.

5.7 Bray Parish Council finds it shocking and entirely unacceptable that although RBWM's sustainability appraisal is clear about the health risks to residents from air pollution associated with traffic close to A roads, the Council's emerging Plan does not consider, in respect of three allocated sites adjacent to the A308, and one site adjacent to two motorways, that the matter is worthy of comment.

5.8 Further, it is difficult to see how a pious hope that residents can be persuaded to reduce their reliance on the use of their personal cars will be effective in altering this situation for the better, and the Parish Council notes that the Plan is silent on the pollution caused by increasing numbers of HGVs along this transport corridor.

5.9 With regard to noise pollution, each of the three sites AL21, AL22 and AL26, allocated for new housing falls, in whole or in part, within the area where environmental noise is “likely to be significant”. The site allocation proformas for each of the sites require the developer to “provide appropriate mitigation measures to address the impacts of noise to protect residential amenity”. It is very probable that developers will be able to satisfy this requirement by judicious choice of materials for new dwellings, together with secondary or tertiary glazing for doors and windows. It is more difficult adequately to screen outdoor areas - gardens, paths, play areas - from noise, and the Parish Council is concerned that its proposed new residents will suffer reduced quality of life and, for children, elderly and vulnerable people, associated health risks.

5.10 Although noise pollution is likely to be a major issue for parts of AL13, in particular those areas within Bray Parish which are close to the A308(M) and A404(M), it is unacceptable that this is not recognised as an issue by the Council.

## **6. Site Allocation AL14**

6.1 The SA at Table 5.1 that this site (The Triangle, allocated for general industry and warehousing) is unsuitable for housing, as 35% of it lies in Flood Zone 2 and 40% in Flood Zone 3. This is not a good start for a major development site, and the Parish Council is concerned that works which might alleviate flood risk on the site might contribute to increased risk of flooding in other areas outside the site.

6.2 The site is in the Green Belt and arguably fulfils all five of the Green Belt Purposes (see paragraphs 3.16 and 3.17 above). There are no exceptional circumstances which would support this large area of land, rather than any other, being arbitrarily removed from the Green Belt.

6.3 It is not located in close proximity to a rail station or other transport hub, nor is it close to a centre of population. Its effective use would be entirely reliant on road traffic, and the number of private employees’ and visitors’ cars entering and leaving the site, coupled with large numbers of HGV movements, would contribute to a great increase in local traffic congestion and to air and noise pollution.

6.4 Furthermore, the Council’s own evidence, at Table 12 of the Economy Chapter of the Changes Consultation, labelled as “Labour Supply Jobs Growth for the Borough for the Plan period (20 years), indicates that of the Total Class B Jobs Growth (6776 jobs), 5908 of these jobs (87.2%) will be in the category Offices B1, with only 519 (7.7%) in the category Offices B2, and 349 (5.2%) in the category Warehousing B8. Given this evidence, the Parish Council cannot follow the logic of releasing over 25 hectares of Green Belt land to cater for provision of 13% of the predicted growth in Class B jobs, rather than concentrating efforts on allocating land close to population centres and transport hubs to meet the needs of the 87% of people who will be seeking work in the Office B1 sector.

6.5 Indeed the total of “jobs growth” in all sectors is given in the same Table as 11,291. Site AL14 would therefore provide for 7.7% of these jobs. The release of 25 hectares of Green Belt for this small proportion of the required employment

opportunities is therefore inappropriate and massively disproportionate to the actual need.

## **7. Site Allocation AL21**

7.1 This is a Green Belt site of nearly 28 hectares which arguably fulfils four of the five Green Belt purposes (see paragraphs 3.16 and 3.17 above). There are no exceptional circumstances which would support this large area of land, rather than any other, being arbitrarily removed from the Green Belt.

7.2 The site straddles the exceptionally busy and frequently congested A308. Not only will the development of 450 houses and other facilities contribute further to the already difficult traffic conditions, the proximity of many of the houses to the road will mean that their residents will be exposed to noise and air pollution, with the attendant health risks. The Government-funded Study of the A308 corridor has only very recently been commissioned and it is premature to allocate large areas of land within this corridor for development, until the Study has reported and until its conclusions have been properly analysed.

7.3 There is an absence of funded proposals to mitigate the issues of traffic congestion, and any mitigation of air and noise pollution is left to the developer to resolve.

7.4 The site forms the first part, moving westwards from Windsor, of the much valued “green gap” between Windsor and Maidenhead.

7.5 There is no information concerning the grading of the agricultural land which would be lost at this site, and any loss of “best and most versatile” land must be justified.

7.6 The Site Allocation Proforma notes that part of the site falls within Flood Zones 2 and 3, and the Surface Water Flooding Maps supports local knowledge that a large [art of the southern and eastern areas of the land floods in winter. Any flood alleviation measures provided by the developer would be likely to increase the risk of flooding elsewhere.

## **8. Site Allocation AL22**

8.1 This former garden centre site of 0.74 hectares is in the Green Belt, and has a lengthy planning history. Planning applications to develop the land with houses have seen very strong objections from local residents and organisations.

8.2 Once again, the site arguably fulfils four of the five Green Belt purposes (see paragraphs 3.16 and 3.17 above), and there are no exceptional circumstances which would support this area of land, rather than any other, being arbitrarily removed from the Green Belt.

8.3 The site fronts the exceptionally busy and frequently congested A308. Not only will the development of 39 houses contribute further to the already difficult traffic

conditions, the proximity of many of the houses to the road will mean that their residents will be exposed to noise and air pollution, with the attendant health risks. The Government-funded Study of the A308 corridor has only very recently been commissioned and it is premature to allocate large areas of land within this corridor for development, until the Study has reported and until its conclusions have been properly analysed.

8.4 The density of housing suggested by the Site Allocation Proforma, 39 homes on 0.74 hectares, equates to 55.71 houses per hectare which is a density greatly in excess of those elsewhere in the neighbourhood of this site. Even were the development of this green belt site to be justifiable otherwise, in the context of the “buffer” of housing land envisaged in the plan (see paragraphs 3.12 and 3.13 above), there can be no justification, in terms of housing need, to build at this high density on this edge-of-settlement land.

## **9. Site Allocation AL26**

9.1 This is another edge of settlement site in the Green Belt. Measuring almost 4 hectares, it is allocated for approximately 100 houses. The Parish Council notes that the proposed housing density, at 25 per hectare, is considerably lower than that proposed for site allocation AL22, see paragraph 8.4 above,

9.2 The site fulfils three of the Green Belt purposes and once again, there are no exceptional circumstances which would support this area of land, rather than any other, being arbitrarily removed from the Green Belt.

9.3 Once again, the site fronts the exceptionally busy and frequently congested A308. Not only will the development of 100 houses contribute further to the already difficult traffic conditions, the proximity of many of the houses to the road will mean that their residents will be exposed to noise and air pollution, with the attendant health risks. The Government-funded Study of the A308 corridor has only very recently been commissioned and it is premature to allocate large areas of land within this corridor for development, until the Study has reported and until its conclusions have been properly analysed.

9.4 The agricultural land at the site is assessed as 85% within grade 3a, i.e. the best and most versatile agricultural land. Such land should, in accordance with both local and national planning policy, be safeguarded. The Parish Council does not consider that the vague references in the Proforma, to alternative provision of allotments, community gardens or orchards on the site will in any meaningful way compensate for the loss of high quality agricultural land.

9.5 The Proforma notes that part of the land lies within Flood Zones 2 and 3, and the Parish Council notes that the current Environment Agency Flood Map for Planning shows that the edge of the site bordering Bray Lake is significantly more impacted by Zone 3 flooding than had previously been anticipated.

## **10. Site Allocation AL13**

10.1 The comments in this section relate to that part of this extensive Green Belt site which falls within Bray Parish, that part which lies south of Harvest Hill Road and was previously given the allocation, in the BLPSV, HA7

10.2 Along with site AL14, this area currently forms an important rural gateway and “lung” to the urban settlement of Maidenhead. It fulfils three of the Green Belt purposes and there are no exceptional circumstances to support its development or removal from the Green Belt.

10.3 The site will suffer from air and noise pollution from the two adjacent motorways, with the likely health risks to residents. The previous allocation for the site, HA7, also noted that there were noise and air pollution risks from the nearby licensed waste site.

10.4 The previous site allocation proforma HA7 also indicated that development in the southern part of this site should be avoided owing to risk of flooding.

10.5 Proforma AL13, at paragraph I, sub-paragraph h, proposes the construction of a new bridge across the A308(M) to create “a distinctive landmark” and to link this site with the employment site AL14. It is not absolutely clear from the Proforma whether this is proposed to be for pedestrians and cyclists, for vehicles or for all traffic. The Parish Council would be reluctant to support this part of the proposal until a traffic distribution model for the site were to be produced and analysed.

## **11. Conclusions**

11.1 Bray Parish Council understands and supports the need for housing, nationally, and commends RBWM for its assiduous efforts to meet 100 per cent of its Objectively Assessed Housing Need within the boundaries of the Royal Borough.

11.2 The Parish Council further appreciates RBWM’s attempts to provide for over and above the OAHN with a “buffer” of over 2000 houses, seeking to provide for a total 15.4% above OAHN. It parts company with the Royal Borough, however, when land for those additional houses is proposed to be allocated in the Green Belt, a proposal which has been greeted with shock by local residents and organisations, as it runs entirely contrary to established local and national planning policy. No adequate justification has been provided to support the building of 969 apparently un-needed houses on four sites (AL21, AL22, AL26 and AL13 (part) comprising around 58 hectares of Green Belt land within the Parish.

11.3 The BLP indicates that provision for a growth of 11,291 jobs needs to be made, in the Plan, over the Plan period. Paragraphs 6.4 and 6.5, above, indicate that the massive release of 25 hectares of Green Belt land at Site AL14 for general industry and warehousing purposes, in order to meet just 7.7% of this need, is disproportionate, inappropriate, and unjustifiable in the light of local and national policies for the Green Belt.

11.4 Bray Parish includes major roads which are inadequate for the amount of traffic which they carry. This is particularly true of the A308 and A330, where serious congestion is experienced routinely at certain times of the day. Despite this, each of the five land allocations proposed within the Parish in the BLP will attract and deliver further road traffic, in large quantities, to the local road network, and in particular to these two roads. The necessary mitigation, in the form of significant road improvements, is neither funded nor proposed as having any reasonable priority. The alternative, reduced reliance on private vehicles and investment in alternative means of transport, is not seriously put forward or costed as part of this Plan. The result will therefore be increased traffic, increased congestion, and increased pollution in terms of both noise and air quality, detrimental to the good health and wellbeing of existing and new residents.

11.5 None of the four new allocations can be described as sustainably located. The four residential allocations are at the edge of settlements. AL14, for employment, is completely reliant on road vehicles for connectivity to anywhere outside the site. The Parish Council do not consider that RBWM, in this Plan, have done the necessary work in order to achieve truly sustainable locations for new and necessary development.

11.6 Each of the five sites has additional constraints, which question the wisdom and suitability of allocation them for development. These are analysed in sections 6 to 10 above and include liability to flood and agricultural land quality.

11.7 Bray Parish Council therefore objects to the aspects of the RBWM Borough Local Plan Proposed Changes October 2019 for the reasons set out in this submission, and requests RBWM to consider appropriate modifications to the Plan (and further consultation upon these), before submitting any further information to the Planning Inspectorate for Examination.

**December 2019**