



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

NOTE: We are providing these Briefing Notes for our supporters and local residents generally. They set out the Ascot, Sunninghill and Sunningdale Neighbourhood Plan Delivery Group's views on this current Reg 19 Borough Local Plan ("BLP"). If you agree with some or all of our points, you are welcome to use them to aid your response to the Reg 19 consultation, but we do encourage you to re-frame them into your own words as much as possible.

RBWM Residents Action Group ("RRAG") have also produced a list of Frequently Asked Questions which you may find helpful. They are available to download from their website [HERE](#).

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 on the previous Reg 18 version, you should be aware that these will NOT be forwarded to the examining inspector, and hence not seen by him/her. If you feel that your comments made then have not been taken into account by RBWM in this 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.
- Please re-phrase or tailor the comments below using your own words and expressing your own views. **Also, 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 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.

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. And 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 the entire borough and for our area and which protects the character of 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, contrary to all the principles of Localism and it undermines our existing Neighbourhood Plan. 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)
Appendix D Housing Site Proformas*

There was some consultation in the early stages of the Plan but the Reg 18 consultation in December 2016 was the first opportunity local residents had to read and comment on an emerging Plan. The policies bear little relationship to those earlier consultations and the site proformas do not properly reflect the site policies in the Ascot, Sunninghill and Sunningdale Neighbourhood Plan. Many made Representations to the Reg 18 consultation saying so.

Although we are told that all Representations to the Reg 18 Plan were assessed as part of the process of arriving at this Reg 19 version, with the one exception - the de-classifying of one Design policy to be non-strategic - we don't see any evidence of this. Few if any of the local community's comments have been taken into account and no valid reasons have been given why.

Local Plans are supposed to be produced through *engagement* - and not just consultation - with local communities. And this Plan manifestly has not been. It is against all the principles of Localism as promoted by government and totally fails to reflect the aims and aspirations of local residents.

REPRESENTATION: BLP undermines our Ascot, Sunninghill and Sunningdale Neighbourhood Plan

Reference: *pp 9-10 List of Policies, AND
Paragraph 1.5 Neighbourhood Plans, AND
HO2 Housing Mix and Type, 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 our Neighbourhood Plan policies on these topics. This dramatically curtails the ability of our ASandS Neighbourhood Plan to influence the type and shape of development in our area.

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*, as well as many others, all deemed “strategic policies”, severely limits the strength of our Neighbourhood Plan.

We are especially concerned that the allocated Site Proformas are specifically referenced in policy HO1 which is strategic. This totally undermines our Neighbourhood Plan policies for 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*

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 Ascot and the Sunnings where we have very high land values, it is very rarely possible to fund 30% affordable housing on a new development.

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*

While we welcome the fact that policy *SP3 Character and design of new development* is now classified as a non-strategic policy, we OBJECT to many of the changes that have been made to this design policy between Reg 18 and this Reg 19 version:

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 results in safety concerns as well as increased gridlock. Yet a requirement for sufficient parking doesn’t even merit a mention in Plan policies, which is a major omission. For example, the BLP overlooks the fact that station car parking at Ascot and Sunningdale stations is at or beyond capacity, which is compounded by loss of parking at Virginia Water station and the future substantial development across our borders at the ex DERA site. This will have a major impact on opportunities for sustainable transport for local residents and visitors in our area.

We object to references to the RBWM Townscape Assessment being removed from policy since the Reg 18 version. Use of the Townscape Assessment has proved critical to the success of our AS&S Neighbourhood Plan in protecting the character of our area, and its removal from this Reg 19 version will potentially have a very harmful impact on it.

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 lack of transparency over the way in which sites have been selected for inclusion in the Plan, in particular the sites earmarked to come out of 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).

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 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. For example, sewerage capacity in Ascot is defined as “critical”. But they are not being addressed. We need a new primary school in our area - existing schools are either at capacity or present serious traffic congestion challenges - but none of this is addressed.

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: 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 make 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: Object to Ascot Centre site allocation

Reference: *Site Proforma HA10: Ascot Centre*

We strongly OBJECT to the inclusion of this site in its current form. The majority of the site is in Green Belt and in proposing its release from Green Belt, the Borough relies in large measure on the fact that this was included as a desired Project in the Ascot, Sunninghill and Sunningdale Neighbourhood Plan. This Proforma however does NOT reflect what was in the Neighbourhood Plan. We have raised this repeatedly with the Borough, including at Reg 18 consultation, but to no avail.

The area included is far greater than that envisaged in the Neighbourhood Plan, and includes Index House, currently a valued employment site, and the Fire Station, both of which are in Green Belt and have never been consulted on.

The number of units allocated for this site (300) is far higher than was envisaged in The Prince’s Foundation Report which formed the basis of the policies and project in the NP.

The site “Requirements” are such that, in reality, they will encourage the number of units to be significantly higher - promoters of two parcels of land included in HA10 are already in consultation with local residents for a total of c. 440 units, and this isn’t even the entire site.

This Proforma makes no mention of the guidance in Neighbourhood Plan site policy NP/SS1 regarding the character of the development, but will still override it. This is a complete undermining of our NP and shows total disregard for the widely-based and lengthy effort and *consultation* that led to its production.

There is no mention of the community’s aspiration to have a “Village Square” associated with the “Community Hub”.

The “strategic open space” allocation should set out what percentage of the area should be retained/provided as open space, in line with what is in the NP.

Critically, the policy Proforma totally fails to address the required improvements to the road infrastructure as set out in NP policies NP/SS1 and NP/SS3.

The way in which this site has been allocated in this BLP has turned a local community who was generally in favour of development in Ascot centre into being strongly against it. The Borough is not only not engaging with local residents, it is ignoring us and setting aside our Neighbourhood Plan.

REPRESENTATION: Object to Englemere Lodge being removed from the Green Belt and designated for development

Reference: *Site Proforma HA30: Englemere Lodge*

This site is in Green Belt. It has never been consulted on for removal from Green Belt, and there is no evidence that justifies how it was selected for inclusion relative to other sites.

REPRESENTATION: Object to proposals for development at Silwood Park

Reference: *Site Proforma HA33: Silwood Park*

This site is in Green Belt. Although it is not proposed for removal from GB, it is allocated for 75 residential units but no case has been made for exceptional circumstances to justify this allocation.

Current NP policy NP/SS9 allocates a much smaller area of this site for a modest development. This BLP completely overrides this policy and shows a significantly increased site area relative not only to what was allocated in our NP but also to what appeared in the Reg 18 version of the Plan. This has never been consulted on, nor is it justified.

REPRESENTATION: Object to proforma details for Sunningdale Park

Reference: *Site Proforma HA34: Sunningdale Park*

The site is in Green Belt and was never consulted on for its removal from GB - even though it was promoted by the landowners (the Cabinet Office) as a potential site as early as December 2014. As a Previously Developed Site it was allocated for re-development in the Ascot, Sunninghill & Sunningdale Neighbourhood Plan through site policy NP/SS8.

This BLP site Proforma overrides this NP policy, which includes in paragraph NP/SS8.4 that if residential development is proposed, “the design should have regard to the Key Characteristics and Description of RBWM’s Townscape Assessment classifications “Villas in a Woodland Setting” or “Leafy Residential Suburbs”. The BLP Proforma directly overrides this by allocating it for 230 units.

REPRESENTATION: Object to proforma details for Broomhall Car Park

Reference: *Site Proforma HA36: Broomhall Car Park*

We have repeatedly queried with the Borough why the Proforma for this site does not state under “Allocation” the requirement to provide Car Parking and Small Scale Retail, as set out in NP site policy NP/SS5. This would make it consistent with how Proforma HA30 Ascot Station Car Park is presented and would avoid any future confusion.

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.

27 August 2017