



ASCOT
SUNNINGHILL &
SUNNINGDALE

NEIGHBOURHOOD PLAN
DELIVERY GROUP

RBWM Borough Local Plan 2013-2033
Submission Version

Regulation 19 Submission

From the Ascot, Sunninghill and Sunningdale
Neighbourhood Plan Delivery Group
Deliverygroup@ascotandthesunningsNP.com

Prepared by:
Peter Lerner MA (Oxon), MRTPI
Chartered Town Planner

peter@plerner1.demon.co.uk
07939 081299

RBWM Borough Local Plan 2013-2033

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CONTENTS

AS&S NPDG Submission: Executive Summary	Pages 1 - 15
Appendix A: Cover page and contents page of “Group” submission	1 PDF; 2 pages
Appendix B: Group Appendix C2: Lack of engagement between RBWM and Ascot groups with Chronology	1 PDF; 6 pages
Appendix B1: Referenced documents to Group Appendix C2	1 PDF; 162 pages
Appendix B2: Reg 18 Consultation ASandS NPDG Representations FINAL	1 PDF; 25 pages
Appendix C: Ascot to Windsor Bus Timetable	1 PDF; 1 page
Appendix D: RBWM Head of Planning letter to SandA PC	1 PDF; 3 pages

ROYAL BOROUGH OF WINDSOR AND MAIDENHEAD

BOROUGH LOCAL PLAN 2013 – 2033

Reg 19 Submission

1. Introduction

1.1 This submission to the RBWM Regulation 19 Consultation is made by the Ascot, Sunninghill and Sunningdale Neighbourhood Plan Delivery Group. This submission is in addition to the submission that we have made with a number of other organisations (the “Group” submission), the title page and contents page of which are attached for reference to this submission, as Appendix A. This submission deals with additional matters that are of particular concern to this organisation.

1.2 The submission has been prepared on behalf of the Ascot, Sunninghill and Sunningdale Neighbourhood Plan Delivery Group by Peter Lerner MA (Oxon), MRTPI, Chartered Town Planner.

1.3 It covers the following topics, all with particular reference to impacts on the Ascot and Sunnings Neighbourhood Plan area:

- Duty to Co-operate
- RBWM’s failure to engage and consult with local Ascot groups
- Inaccurate estimate of housing numbers
- Affordable housing
- Infrastructure
- Undermining of AS and S Neighbourhood Plan
- Comments on specific site allocations

1.4 Please note that we wish to have an opportunity to present our case, and evidence, to the Examiner, at the appropriate time.

2. Duty to Co-operate

2.1 This section of our submission should be read in conjunction with Section 4 of the Group submission, and also its Appendix B: Duty to Co-operate to the Group submission, which provides a complete, evidenced rebuttal of RBWM’s Duty to Co-operate Compliance Statement (May 2017).

2.2 Our concern in particular is over the effectiveness and usefulness of the Duty to Co-operate process as carried out by RBWM with the local authorities which border Ascot, Sunninghill and Sunningdale, which are Bracknell Forest Unitary Authority, Runnymede Borough Council, Surrey Heath Borough Council, and Surrey County Council.

2.3 Our hope and expectation would be that full and transparent consultation would have taken place throughout the plan-making period, from 2009 to date, between RBWM and its neighbours. That is also what is expected by the legislation. We would expect the discussions to cover issues such as housing allocations, green belt strategy, traffic and transport, infrastructure and employment amongst many others.

2.4 As far as Bracknell Forest and the Surrey authorities are concerned, there is no evidence of systematic discussions having taken place about the BLP. Appendix B of the Group submission gives a number of examples of Bracknell Forest expressing concern over the paucity of information that RBWM had shared with it.

2.5 Bracknell Forest themselves are currently preparing a Comprehensive Local Plan. Their SHELAA, dated November 2016, identifies locations for a potential 8,812 new homes. Of these, 6,887 are in the parishes / town areas closest to Ascot, namely, Winkfield (2711), Warfield (2508) and Bracknell Town (1668). There are 31 sites in Winkfield, 19 in Warfield and 11 in Bracknell Town (Table 7, Bracknell Forest SHELAA November 2016). However, at the time of writing (September 2017), Bracknell Forest's website does not list RBWM as having responded to its consultations on any matter, although specific consultations have been initiated on 11 separate issues relating to its Local Plan.

2.6 Equally seriously, there is no available record of consultation by RBWM with Surrey County Council, as neighbouring highway authority, about jointly shared strategic highway issues. This is despite there already being significant traffic congestion on the A30, which marks the boundary between our area and Surrey. And this is as nothing in comparison to what the future is likely to bring, as the former Ministry of Defence site (DERA Site, Chobham Lane. Longcross, Chertsey. Surrey), some 2 miles from the RBWM boundary with Surrey, already has planning permission for 200 dwellings (ref [RU.13/0856]). In January 2017, the Government gave its backing to pursuing a locally-led Garden Village at Longcross under this new national initiative, via which a further 1,500 homes are envisaged.

2.7 Add to this that we have the dubious honour of having a level crossing on the busy A30 that is closed for longer per hour than any other in the country, which is also within 350m of its junction with the B383 Chobham Road - a main route into the above developments. This route also includes a narrow humpback bridge on a bend, which further interrupts traffic flows. A highways **cross boundary masterplan** is essential to plan how to accommodate all this development; this BLP certainly does not include one, and the Council appears to have made no effort to even engage with the neighbouring authorities to seek any solutions.

2.8 Future challenges are not confined to highways issues. There are concerns around sufficient GP surgeries between Surrey and RBWM, and serious concerns expressed repeatedly by Bracknell Forest in relation to the need for more school places. None of these issues have been addressed by RBWM through any DtC discussions.

2.9 Our conclusion is that RBWM has not taken its duty to co-operate seriously, and does not have a great deal of interest in sharing information with its neighbours, even though this would be of great benefit to the authorities and to their residents. The BLP is not informed by cross-boundary working on improvements to the road traffic network, nor on strategy regarding housing numbers and locations, nor on employment, infrastructure or many other issues.

2.10 Because there is no confidence that the Plan has been informed by the views of, or joint working with, neighbouring authorities, we ask the Examiner to declare the BLP legally non-compliant and therefore unsound.

3. Failure to Engage and Consult with Local Groups

3.1 Section 5 of the Group submission, together with its Appendix C_Failure to Consult and Engage, provide a robust and damning critique of RBWM's efforts to consult meaningfully through the duration of the plan-making process.

3.2 Major changes of strategy, on such key matters as development in the green belt, have taken place at RBWM without being explained to hard-working, and hitherto interested and engaged local groups. A promised Second Preferred Options consultation was never carried out. Local groups seeking reasonable information from the Council have had to resort to Freedom of Information (FOI) requests in order to obtain answers.

3.3 A short section of the Group submission's Appendix C details the particular concerns of groups in the Ascot area, as follows:

"2.9 As at September 2017, the Ascot, Sunninghill and Sunningdale Neighbourhood Plan remains the only NP that has been made by the Council. This was made in April 2014 so has been part of the development plan for 3½ years.

2.10. The Ascot, Sunninghill and Sunningdale Neighbourhood Plan Delivery Group ("ASandS NPDG") was formed out of the original NP Steering Group to monitor and champion the NP, together with the Society for the Protection of Ascot and the Environs ("SPAЕ") and the two Parish Councils.

2.11. The organisations have found it very difficult to engage with the Council over this BLP. The Council has been reluctant to share information or to respond to any feedback on issues of concern.

2.12. All initiatives for meetings or other engagement has come from the ASandS NPDG/ SPAЕ and has generally met with considerable resistance.

2.13. A chronology of exchanges between RBWM and Ascot groups between March 2014 and this Reg 19 consultation is attached as Appendix C2: Lack of engagement between RBWM and Ascot groups with Chronology.

2.14. This demonstrates how, in the view of the Ascot groups, the Council is simply not listening. The same concerns that we expressed in March 2014 apply to this Submission version of the Plan and we have never been given any robust reasons for why they could not have been addressed.

2.15. The Ascot groups remain deeply concerned about the harm that this BLP will do to our Neighbourhood Plan and to our area."

Group Appendix C2, together with referenced documents, are appended to this submission as Appendices B, B1 and B2.

3.4 As a direct result of the Council's failure to engage locally, enthusiastic and committed residents of Ascot, Sunninghill and Sunningdale, who have been keen and proud to become involved in local place shaping via their pioneering and successful Neighbourhood Plan, are unable to understand why RBWM no longer feels that their participation and engagement in local planning is worthwhile.

3.5 An example of RBWM's failure to interest itself in jointly working with the Ascot and Sunnings Neighbourhood Plan can be found in its attitude towards the NP's adopted policy on car parking. NP Policy NP/T1 states that "Development proposals must make adequate provision for parking and access for deliveries, service vehicles, tradesmen working on site and social visitors as well as for residents or workers."

3.6 This policy has been consistently ignored by the Council's highways officers when giving advice on planning applications, who rely instead on the Council's Parking SPD, which is considerably out of date (2004) and relies on maximum parking standards. (The Government, according to DCLG's Planning Update for March 2015, abolished maximum parking standards in 2011). The reason given by RBWM's highways officers for not using Policy NP/T1 is that there "are no numbers attached to it". The Ascot and Sunnings Neighbourhood Plan Delivery Group (NPDG) raised the matter formally with RBWM's Lead Members for Planning and Highways in August 2016. They then ran their own survey to determine local residents' current residential parking attitudes and patterns, and views on what parking standards should be for new development. A summary of the results was sent to the Lead Members for Planning and Highways, suggesting they might wish to consider running something similar across the borough. This communication, sent in February 2017, has not been responded to, nor even acknowledged.

3.7 RBWM's failure to consult with ourselves, as an established Neighbourhood Plan Group throughout the Plan process, explaining and engaging with us on proposed changes of strategy, new land allocations, infrastructure, and the impact of proposed BLP Policies on the implementation of our Local Plan, is inexplicable and has caused immense frustration and anger locally. For this reason, as an indication of the more general failures to consult and engage which are detailed in the Group Submission, we ask the examining Inspector to declare the Plan unsound and ensure that the process is re-commenced, with proper engagement with all partners and stakeholders.

4. Inaccurate Estimate of Housing Numbers

4.1 All of the large sites within the Ascot, Sunningdale and Sunninghill area, which are now allocated for development in the current version of the BLP, were already included in the adopted Neighbourhood Plan. Many of these are already the subject of public consultation (by owners or developers) or are already in the planning system. It is already apparent that the number of units allocated to the sites in the BLP Housing Site Allocation Proformas is likely to be significantly exceeded.

4.2 For example, site HA10 (Ascot Centre), which has a number of land-owners, is being promoted in sections by different stakeholders. The Ascot Landowners Consortium are consulting with the local community on delivering up to 350 residential units on their land. Shorts Recycling Transfer Station have carried out one public consultation and are looking to provide around 145 units on their land. There is also additional land included in the site, owned by neither of the above. Our conclusion (without comment on the merits of the schemes which are being consulted on by the owners / developers) is that the total residential units on HA10 will be considerably higher than the number (300) envisaged in the BLP, quite likely around 450.

4.3 Site HA34 (Sunningdale Park) is listed on the Proforma as accommodating approximately 230 dwellings; the recent developers' consultation proposed 280 units. Likewise Site HA35 (Gas Holder Site, Sunninghill) is listed in the BLP with an estimated 53 units, while the developer has just completed a second round of public consultation on a scheme for 81 units.

4.4 Table 1 below indicates that the total number of units which are likely to be developed on the allocated sites in our area will be around 1236, rather than the 991 suggested in the BLP. This would be an additional c. 25%.

TABLE 1: ALLOCATED HOUSING SITES IN ASCOT AND THE SUNNINGS

BLP allocated site	(Approx) No of units in BLP	Nos being consulted on	Estimated final no
HA10 Ascot centre Plus Shorts Plus other parts of site	300 included included	Up to 350 145 unknown	470
HA30 Ascot Station	35	50 (in early discussions and Reg 18 representation)	40
HA31 Englemere Lodge	10	n/a	10
HA32 Heatherwood hospital	250	Outline planning granted for 250	250
HA33 Silwood Park	75	n/a	75
HA34 Sunningdale Park	230	293	270
HA35 Gas holder	53	80	81
HA36 Broomhall CP	28	n/a	30
HA37 White House	10	n/a	10
TOTAL	991		1236

4.5 The scale of the discrepancy here reflects badly on the quality and/or the integrity of RBWM's approach to housing numbers in the BLP. We fear that there may be an intention to mislead local residents about the likely scale of development that is likely to take place, but of equal concern is the fact that such scale of development is unsustainable: even if the borough were to plan for it - which the current BLP and IDP do not attempt to do - we question whether the physical constraints of our narrow roads, limited and expensive land for increased parking, schools and other infrastructure would make this even possible.

4.6 The 25% increase in dwelling numbers on allocated sites projected above demonstrates that there is no need to release Previously Developed Land (PDL) sites such as Shorts (part of HA 10) and Sunningdale Park (HA 34) from the Green Belt – the existing NP already allows for their redevelopment but on a density that would be more appropriate for their designation as Previously Developed Land within the Green Belt, and which would be more in keeping with the existing character of the area.

4.7 The same argument questions the need to release land south of Ascot High Street (HA 10) from the Green Belt at all, if sufficient housing can be found on alternative sites. In our view this clearly demonstrates the weakness of the Borough's case is for allocation of Green Belt sites for housing.

4.8 We argue that, because of the doubt which has been caused by RBWM's calculations, a further review of housing site allocations is urgently needed. This might well result in some designations for new housing within the Green Belt being entirely abandoned (to the relief of many). RBWM have also increased numbers on various sites which have previously (including in our Neighbourhood Plan), been designated as Previously Developed Land within the Green Belt. Increasing the allocated numbers has encouraged RBWM to propose the removal of these areas from the GB, rather than (as previously) allowing for appropriate redevelopment of PDL.

4.9 We are also very concerned about the likely shortcomings in RBWM's methodology for calculating "windfall sites". The BLP at Table 2, Chapter 7, suggests that 1,840 dwellings will arise from windfall sites during the Plan period. RBWM have defined such sites as being less than 0.25ha in size, but there is evidence, in particular from our part of the Borough, that larger sites (typically between 0.3-0.8ha) have been consistently obtaining "windfall" planning permissions for increased housing numbers. This is explained by the numbers of relatively elderly houses, on large plots, in this locality. The argument which the borough has put forward, that these sites will cease to come forward because the allocated sites will supply the market, is a nonsense. The housing 'estates' that will be built on the allocated sites serve a totally different developer and buyer market than prestigious 2-4 detached houses or blocks of 6-10 high end apartments on green and leafy semi-urban streets which these windfall sites represent.

4.10 Examples of such proposals, in our part of the Borough, from the recent past include:

- 13/02479: 2 detached houses on 0.39 hectares at Chesham House, Coronation Road, Ascot
- 13/00746: 10 apartments on 0.70 hectares at Rustlings and Kingsland, London Road, Ascot
- 15/02096: 2 detached houses on 0.36 hectares at Orchard Close, Whynstones Road, Ascot
- 16/02272: 4 houses on 0.3 hectares at Littlefield, London Rd, Sunningdale

4.11 These sites have obtained planning permission from RBWM and were not listed in any available version of the HELAA or SHLAA. Appendix G4 of the Group submission lists 7 sites over 0.25 ha which have provided a windfall contribution of 153 new dwellings, an addition of more than 8% on the predicted windfall total, on a small number of large sites in a limited area, over a very few years. Our view, informed by such evidence, is that many more, similar sites will be the subject of development applications within the Plan period, and it is unrealistic for RBWM not to take them into account in their calculations.

4.12 Finally, in this section of our submission, we are concerned about the Council's statements in the BLP about housing densities, and the freedom, or otherwise, that these will allow us in applying our own Neighbourhood Plan policies relating to the character of individual areas. While not expressed directly as a Policy, BLP paragraph 7.11.1 includes the statement that "a minimum net density of 30dph would be appropriate across the district".

4.13 Our Ascot and Sunnings NP has striven, with great success, to protect and enhance the character of individual parts of our area, while continuing to welcome appropriate new development. We have achieved this by using the RBWM Townscape Assessment to inform our work on the special characteristics of our communities. The minimum density requirement will be gladly accepted by developers, but those preparing or implementing Neighbourhood Plans, such as ours, will henceforth find it difficult to gather support for lower densities sufficiently to influence new developments and their impact on the character of individual areas. Even if future Neighbourhood Plans do manage to include policies relating to local area characteristics and densities, the wording of (strategic) Policy 7.12 and its introductory paragraph 7.11.1, is sufficiently strong to ensure that it would override the intentions of the Neighbourhood Plan.

This is greatly to the detriment of what our AS&S NPDG have been striving to achieve, with great local support.

5. Affordable Housing

5.1 RBWM has set a target (Policy HO3) of a minimum of 30% affordable housing units to be provided within the Plan period on sites proposing over 10 net additional dwellings or a gross internal floor area over 1000 sq metres. The headline figure of 30% affordable housing has been given much publicity by the Council. However, Section 9 of the Group submission demonstrates very clearly why the policies in the BLP are not sufficiently robust to enable the achievement of anything like the promised 30% (4272 affordable homes).

5.2 The challenges to providing affordable housing in our area are great. Land in our area is expensive even relative to the borough as a whole (a recent quote from estate agents Strutt Parker put this value at c. £2m per acre), and land in the Borough is itself expensive by national standards.

5.3 This is reinforced by our own first-hand experience as the Neighbourhood Plan Delivery Group: the promoters of no fewer than 5 of the allocated sites in our area in the BLP have already held consultation discussions with us: ALL are expressing serious doubts about their ability to provide affordable housing on site, because it would render their development unviable. This will be the inevitable consequence of this BLP unless RBWM are more convincing in **requiring** a minimum of 30% affordable housing on all sites (eg. by building this into the BLP Site Proformas).

6. Infrastructure

6.1 We are deeply concerned that the BLP demonstrates inadequate analysis of existing infrastructure – its strengths and weaknesses – and likewise little or no clarity about how the proposed additional developments will bring about the required changes (hopefully these being improvements).

6.2 The section on Duty to Co-operate above indicates our great concern that RBWM has not had meaningful or focussed discussions with neighbouring authorities on cross-boundary issues. These could, and should, take in strategic matters such as highways, employment patterns, provision of education and healthcare, tackling flooding, sewerage and drainage. However there is no evidence of such discussions and proposals for positive action are absent.

6.3 Within the Borough boundaries, although the BLP at various points helpfully points out inadequacies in education provision (“significant numbers of new secondary school places are required from 2017 onwards” – BLP para 3.4.9), healthcare (“only 1%” [of households] can access emergency hospital services within 30 minutes – BLP para 3.4.7), and road transport (BLP para 14.4.3 refers to congestion, poor air quality, traffic noise issues and road safety risks), there is

again inadequate evidence of thought being given, by RBWM, to how these problems may be tackled.

6.4 Taking road transport as an example, the Strategic Highways Model, used as supporting evidence for the BLP, made use of 2016 traffic data. The base model for this data is current (2016) traffic levels, plus traffic arising from development in neighbouring areas. However, the information about neighbouring areas is based on extrapolation from national growth models; no effort was made to invite inputs of more realistic data from the neighbouring authorities. The Model therefore also fails to take into account the level of development that is being proposed by Bracknell Forest and the Surrey authorities, within 5 miles of our boundaries. A traffic model that does not take account of development in these neighbouring areas cannot be considered a realistic basis on which to plan. .

6.5 In our response to the Council's Regulation 18 Consultation, we said "The stated BLP strategy is to meet the OAN. There is nothing in it – or in the supporting documents provided - that assesses whether it is viable or possible, in terms of physical and practical constraints, for sufficient infrastructure, especially roads, to be provided to make the predicated level of development viable and sustainable. For example, in Ascot and the Sunnings our roads are already congested. Census data comparing the rate of increase in cars/vehicles between 2001 and 2011 for our area showed an increase of 14%, compared to an increase in households of just 5%.

6.6 We are facing an increase of over 30% in new housing in our area; we are extremely concerned about how we will accommodate the resulting increase in vehicles if, as indicated by the trend in the census data, this is likely to be at 2-3 times the increase in households. This trend is also supported by local experience: it is the result of a mix of more children living at home for longer, often with their girl/boy friends; elderly parents moving in, many still owning cars; a high level of visiting carers, cleaners, gardeners; and a massive increase in home deliveries. We are deeply concerned that, irrespective of how much money there may be to fund road improvements (and funding is severely limited, rather than infinite), it is simply not possible to improve our road infrastructure sufficiently to cope with this level of development. This would render this BLP unsustainable.

6.7 The Plan proposes Ascot centre as a sustainable location for significant development. But there are virtually no bus services servicing our area. There is essentially one bus route that offers 8 services per day from Ascot to Windsor – see Appendix C_Ascot to Windsor Bus Timetable. So anyone wishing to use a bus to commute to work or to the station, does not have this option. Our trains are full to capacity and current plans to increase number of carriages from 8 to 10 will only accommodate current needs. We see no evidence that the Borough has consulted with Network Rail and the train operating company in order to discuss future line capacity.

6.8 Primary education is another example of much needed infrastructure in our area. During the Summer of 2016, the AS and S NPDG worked closely with the Borough's education team, who prepared and ran a public consultation on the need for more primary school places, and the possible options for addressing this. The results were a short term solution to expand one of the local schools, but a clear need also for a new school to accommodate projected future needs.

According to the RBWM consultation report on the website, at the cabinet meeting on 25 August 2016 the following decision was recorded:

- Approve the next stage for an expansion at Cheapside CE Primary School, with the publication of a formal proposal.
- Authorise the procurement and tendering for the scheme.
- Request that one or more sites for a new primary school in Ascot are identified.
- Request further work on the other options, so that they can be implemented if and when needed.
- Request that a local infrastructure plan is developed for any option being implemented, to minimise the impact of new primary school places on the local community.

6.9 This Plan however fails to allocate land for a new school in our area and the IDP equally fails to address school-related traffic congestion. An earlier version of the Plan included a requirement for a school to be included in the Ascot Centre site, until it was made clear to the Borough both by the land development promoters and local residents that there was neither space for it, nor the road infrastructure to make it viable.

6.10 The Infrastructure Delivery Plan, which is intended to support the BLP, was provided only as part of the Regulation 19 supporting documents. The previous IDP was acknowledged as being long out of date, and until Reg 19, there was no other information provided by RBWM on the important issue of infrastructure. It is therefore impossible not to conclude that the BLP was prepared without being informed by up to date evidence on infrastructure.

6.11 Paragraph 1.5.6 of the IDP remarks that “It is important to note that the IDP is a mechanism for identifying the future infrastructure requirements of development proposed as a result of the BLP. It does not address existing deficiencies in infrastructure provision which should be the subject of specific institutional responses as appropriate” It is not possible to relate this statement to what should be an overarching vision about infrastructure needs in the Borough. Para 2.3.6 of the IDP worryingly adds: “A number of infrastructure partners and service providers are still to provide information requested...”

6.12 We therefore draw the conclusion that the IDP may (or may not) identify some infrastructure needs within the Borough, but it does not set out how they will be delivered or funded (other than by broad statements of intent). This conclusion is supported by Paragraph 2.4.4 of the IDP which states: “The Infrastructure Reference Group will produce an Infrastructure Investment plan which will set out the details of how the identified infrastructure requirements for the BLP will be funded.” What is clear from the available documentation is, however, that the main focus for infrastructure provision in the Borough, during the Plan period, will be Maidenhead.

6.13 Because of the failure of the BLP to address vital issues of both local and strategic infrastructure systematically and transparently, we consider this a further reason to request the examining Inspector to declare the Plan unsound.

7. Undermining of our Neighbourhood Plan

7.1 Ascot, Sunninghill and Sunningdale was the first area in the Borough to produce a Neighbourhood Plan. This involved well in excess of 50 local residents who were very prepared to devote their time to the future of their communities. The NP received an overwhelming 91% Yes vote at referendum and was made by the Council on 29th April 2014. The Borough Council heaped much praise on the NP and frequently used it as a role model to encourage other areas to develop NPs.

7.2 We believe that our NP policies, and in particular the design policies, have since proved very successful in helping to protect the character of our area, a key priority of local residents in producing a NP. Our NP has, as was intended, had great influence on the outcome of many planning applications, and appeals, in our area.

7.3 We commented at Regulation 18 stage: “Reading this draft BLP, which we have done very carefully, the local community feels deeply let down and betrayed that so much of what we worked so hard to deliver is now being put aside and ignored, or will be undermined by the BLP. There will no longer be any point in having a NP – and this is not what Localism is supposed to be about.” The position has not improved with this Reg 19 version, and we have described in the “Failure to Consult and Engage” section above how our concerns have been cast aside by the Council.

7.4 It is perhaps illuminating to note the comment from the Head of Planning, Jenifer Jackson, in a letter to Sunninghill & Ascot Parish Council dated 8 June 2017 (see Appendix D_RBWM Head of Planning letter to S & A PC), in which she states “In my view the Parish Council should be considering repeating the process to produce a new neighbourhood plan to ensure that the plan remains robust and deliverable.” While this would certainly mitigate any embarrassment for the Council arising from the fact that this BLP fails to respect the policies in our current Neighbourhood Plan, it is hardly a reasonable suggestion for a plan that is only 3.5 years old.

7.5 At Regulation 18 stage we expressed our concern at the number of BLP policies which were deemed to be “strategic”. The Borough’s definition of ‘strategic’ extends to matters of local character, housing mix and townscape, which severely reduces the potential for Neighbourhood Plans to incorporate local flexibility in these matters. This seems to us to be the very opposite of Localism, being a top-down “we know best” message from the Royal Borough.

7.6 In our section on housing numbers, Section 4 above, we have argued that the Council’s blanket approach to residential densities (BLP Policy HO5) will limit the ability of Neighbourhood Plans to sensitively influence developments towards a recognition of specific local characteristics. This is a retrograde step, as our NP approach to influencing appropriate development has demonstrably succeeded to date. Policy HO5 is a blanket policy that is especially inappropriate in our area, which includes many streets characterised in the Borough’s Townscape Assessment as ‘Villas in a Woodland Setting’ and ‘Leafy Residential Suburbs’.

7.7 Our NP Policy NP/DG1, “Respecting the Townscape”, is built around the concept of townscape assessment, and uses the Borough’s Townscape Assessment as its support in defining areas of different identifiable character. We are dismayed to note that the relevant BLP policy, SP3 (Character and Design of New Development) has deleted all mention of the Townscape

Assessment (which had been in the Reg 18 version). This, at a stroke, undermines a key ingredient of our Neighbourhood Plan.

7.8 Similarly the strategic Policy HO2 (Housing Mix and Type) is set to over-ride our carefully drafted NP Policy NP/H2, Mix of Housing Types. The effort that was put in locally, towards getting this right, has evidently been wasted, and we deplore RBWM's apparent lack of respect for our Neighbourhood Plan. Likewise, BLP Policy HO6 (Loss and Sub-Division of Dwellings) is a blunt instrument which will over-ride our NP design policies.

7.9 Our frustration at RBWM's non-consultative approach extends to the chosen Housing Allocation Sites within our part of the Borough, and the associated Proformas in the next section of our submission. The BLP Proformas are deemed to be "strategic", and therefore will be deemed to over-ride our NP policies, both because of their definition as strategic and because they are more recent. This is without question the interpretation which developers will find most convenient.

8. Specific Site Allocations

8.1 HA10: Ascot Centre

8.1.1 This allocation for approximately 300 dwellings, strategic open space, a multi-functional community hub and small-scale retail, on land including areas of Green Belt, will have a major impact on Ascot.

8.1.2 There are currently around 150-200 homes in the centre of Ascot. HA10 proposes an additional 300 new homes for Ascot, although we know from current developer consultation on two parts of this site that developers are currently seeking to provide some 450 units (see Housing Numbers, Section 4 above). The Ascot Station site (HA30) and Heatherwood (HA32) are likely to deliver nearly 300 more dwellings. This is by any measure a significant expansion of Ascot, and if this, or something like it, is to take place, it must only be done with the most careful consultation and engagement with local people and organisations. Such consultation and engagement has not, of course, taken place which is a major disappointment in an area with its own Neighbourhood Plan, populated with individuals and groups who have the interests of Ascot at heart and are keen to plan for its future.

8.1.3 Our view is that RBWM have taken the desire to rejuvenate the centre of Ascot and to improve its retail offer, as expressed in our NP, and have turned it into a full scale development opportunity, which shows all signs of harming the character of the place which the NP had striven to protect and enhance.

8.1.4 There are many reasons to query the logic and lack of evidence base lying behind this opportunistic allocation. The site allocation includes the removal of a large area of land – all the land south of Ascot High Street – from the Green Belt. There are no exceptional circumstances to justify this.

8.1.5 The number of dwellings allocated is far higher than was ever envisaged in the careful discussions which formed the basis of the policies for the area in the NP. Given the size of the current local community, and the particular character of the area, the proposals would have a

massive impact which would need to be managed most carefully. Development would need to be phased over a number of years with clear milestones for improved infrastructure set out in the Plan. This is not something that we support and we strongly believe that it is not supported locally. However the cynicism under which a careful proposal for the rejuvenation of the village centre has been turned into a site for major development, without thought for the local community, is breathtaking.

8.1.6 As a majority of the land covered by this site is currently in Green Belt, it was not included in RBWM's Townscape Assessment, which informed our Neighbourhood Plan. This makes it imperative that the guidance for character of the area that is in the NP is included in the Proforma: *"Area north of Ascot High Street shall be similar in character and scale to the existing two storey terraced housing around Course Road"*. And area south of Ascot High Street *"is envisaged should be in keeping with the Key Characteristics and Description of RBWM's TA classification 'Leafy Residential Suburbs' and/or 'Late 20th Century Suburbs'"*

8.1.7 BLP policy IF4, paragraph 2 states that *"new open space will be required on allocated housing sites as set out in the site proforma..."* The "strategic open space" allocation and requirement in this proforma should therefore set out what percentage of the area should be retained/provided as open space; and this should be in accord with what is in the NP, which is 15% for the area north of Ascot High Street and 25% for the area south of the High street.

8.1.8 We do not consider that RBWM have satisfactorily taken into account the required improvements to the road infrastructure set out in the NP (Policy NP/SS1.2), without which the impact on traffic movements in Ascot will be unimaginable. Our understanding is that there are already up to 18,000 traffic movements per day on Ascot's narrow High Street (data from a transport consultant, taken during 2017; 24 hour period, weekdays). It cannot be left with developers alone to address traffic issues arising from the cumulative impact of proposed development across several sites.

8.1.9 The Proforma gives no detail or guidance on what *"provision of public car parking"* means – the NP indicates *"sufficient car parking for residents, local shoppers, workers and visitors to include a dedicated short term car park for the local community"* We expect the BLP to be specific about the capacity and location of the proposed public car parking area(s). This is vital, given the pressure on Ascot and its facilities during Race Days.

8.1.10 Locally, we support the community's aspiration to have a "Village Square" associated with a "Community Centre", as part of any new development in Ascot Centre. The description in the proforma of a *"multi-functional community hub"* is not precise, but will not be interpreted as also including a village square.

8.2 HA31: Englemere Lodge

8.2.1 A development of 10 houses on Green Belt land is proposed.

8.2.2 The allocation, in common with all of the housing site allocations, is deemed to be "strategic", although we do not understand how this adjective can be realistically applied to a small development proposal (10 dwellings) on a small site (0.65 hectares).

8.2.3 There has been no previous consultation on removing this site from the Green Belt and we can see no exceptional circumstances whatsoever to justify this proposal. The two major roads, A329 and A332, form clear boundaries for development. In our opinion the proposed

development would impact on valuable trees, and would threaten the SSSI and local nature reserve at Englemere Pond (only 200 metres distant), as well the green corridor to the Pond, which is defined in our Neighbourhood Plan.

8.2.4 Minimal engagement with our NP and Delivery Group would have demonstrated the lack of justification for developing this site and the unwarranted threat to local amenity.

8.3 HA32: Heatherwood

8.3.1 The site is allocated for 250 dwellings and a health use on previously developed Green Belt. The RBWM Borough wide Planning Panel recently approved a planning permission to the Frimley Health NHS Foundation Trust for a new Hospital, subject to conditions. This hybrid planning application included outline permission for the development of 230 dwellings on the site. What remains to be seen is how far RBWM will carry through their stated desire for 30% affordable housing on this as for all newly allocated sites. This is so far unclear.

8.4 HA33: Silwood Park

8.4.1 This is an allocation for 75 dwellings on Green Belt land. The site is included in our NP as site NP/SS9; however RBWM have increased the development envelope very significantly since the Regulation 18 Consultation. Previous drafts of the BLP, up to 2016, indicated that “a modest development of up to 25 units may be considered”. There has been no local consultation on any proposal to enlarge the development envelope and to radically increase the number of dwellings, and we consider that the resulting allocation is completely inappropriate for a Green Belt location such as this.

8.5 HA34: Sunningdale Park

8.5.1 A site of 4.83 hectares is proposed to be removed from the Green Belt and is allocated for approximately 230 dwellings. However, the developer is actively promoting a development of 290 dwellings, which would result in the extremely high density of 60 dph.

8.5.2 We consider the proposal to remove Green Belt protection from the site to be illogical and highly damaging. The proposal to remove the site from the MGB has not been the subject of local consultation by RBWM. We accept that part of the site has been allocated as PDL within the Green Belt, but are extremely concerned that the proposal to remove the site’s GB status and increase the potential for development via a strategic housing allocation, will remove our ability via the NP to control the density of development, and that our NP Policy concerning area character will be over-ridden.

8.5.3 The allocated site forms part of the larger (32 hectares) Sunningdale Park which includes a Grade II Listed Building (Northcote House), a number of other listed buildings, and a large area of gardens and parkland which are on the Register of Historic Parks and Gardens of special historic interest in England.

8.5.4 We consider it inconceivable that this section of an important larger site can be allocated for development in a Local Plan without a major study of the whole of the Park, its historic assets and significance, its role within the Green Belt, and some idea of the fate which will befall the remainder of the estate when the site is developed, as proposed.

8.5.5 We are not aware of any proposals for affordable housing within that development, as a result of any local consultation or via a requirement in the strategic housing allocation.

8.5.6 We are extremely concerned, and disappointed, that the likely development, if the current BLP is adhered to, will be a far cry from what was consulted on in our Neighbourhood Plan which states in policy NP/SS8.4 for Sunningdale Park: “Any redevelopment must respond to the surrounding green and leafy character. 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.”

8.5.7 This is a prime example of the Council’s rush to find sites to allocate for development without meaningful consultation and without proper and informed study of the consequences of the development. Were a proper Green Belt Review to have been undertaken and consulted upon, the likely availability of some of Sunningdale Park for housing would have been assessed and examined in a much wider context. We believe that removal from the Green Belt and development at high density as proposed, without recognition of the carefully worded policies in our Neighbourhood Plan, may cause lasting damage to an important historic asset.

8.6 HA36: Broomhall Car Park

8.6.1 The Proforma indicates that the site should include increased public car parking and also small retail units. We consider that these elements should, for the avoidance of any future doubt, be added to the formal Allocation, which currently only mentions residential units. To be in accord with the Neighbourhood Plan, the Requirements should also specify the provision of a public open space.

9. Conclusion

9.1 Our Neighbourhood Plan has been a story of success, in terms of its speed of completion, its local support, and its effectiveness in influencing and shaping development proposals within our area. We were delighted with the support of the Royal Borough – both Councillors and officers – at the time it was being prepared and examined, for much advice and expertise. Our NP remains the only fully adopted Neighbourhood Plan within RBWM.

9.2 Over the past 2-3 years, however, our excellent mutual relationship has withered, and the BLP has been prepared without consultation or engagement with us, or more generally with people in our locality, and with scant regard for either what our Neighbourhood Plan actually says, or the potential impact of the BLP on our carefully thought out approach to good planning. We are aware that time does not stand still and that there sometimes need to be effective new approaches to well known problems, but this does not excuse the fact that RBWM has ignored us and our Plan in its haste to accumulate housing numbers, at any cost.

9.3 We are located at the edge of the Borough close to other planning authorities who themselves, understandably, have ambitious plans for development. We are shocked that our own Council has seemingly, whether via Duty to Co-operate or any other process, failed to consult and engage with those authorities on the impacts such developments, combined with those proposed by RBWM, will have on communities such as ours.

9.4 We believe that RBWM’s lack of proper engagement with our authorities during the plan-making progress is breath-taking, and as such renders the Plan illegal in terms of carrying out the Duty to Co-operate meaningfully. Furthermore, its conspicuous lack of local engagement at all

stages of the Plan, coupled with its arrogant refusal to improve the situation even when this was pointed out to them, is sufficient for us to ask that the Plan is formally declared to be unsound. This is additional to the technical reasons which we have indicated, and which the Inspector will not fail to note, including the lack of Green Belt Review, inaccurate estimates of capacity on housing sites, misleading calculation of windfall sites, and absence of any work on infrastructure issues other than as reaction to hastily assembled land allocations.