



RBWM Borough Local Plan 2013-2033 Submission Version Incorporating Proposed Changes October 2019

Submission from OGFRA

Introduction

This submission is made by the Oakley Green & Fifield Residents Association (“OGFRA”). It follows previous submissions to the RBWM Local Plan Regulation 19 Consultation, and this submission supplements our Regulation 19 Submission. OGFRA is also one of the 13 organisations who have combined to provide substantial evidence to the Regulation 19 Consultation and the current Proposed Changes Consultation, and this submission should be read as complementary to the evidence submitted on behalf of the 13 Organisations. It is intended to focus on issues directly affecting the Oakley Green and Fifield area. It is essential that this submission is passed on to the Inspector in full.

Oakley Green & Fifield Residents Association (see www.ogfra.org) was established over 40 years ago by the residents of Oakley Green and Fifield and is committed to protecting the local environment, with particular emphasis on protecting the Green Belt. OGFRA has a constitution, a Committee of 8 members and over 200 registered members. Membership is available to residents in the Oakley Green and Fifield Ward of the Parish of Bray and to those who live close enough to be affected by action and development in that ward. OGFRA works with other bodies having similar or sympathetic aims where appropriate to achieve the wishes of the members of the Association.

OGFRA has attended EIP sessions through the RBWM Residents Action Group (RRAG), and wishes to attend any future session at the Examination which covers the allocation relevant to its area.

This objection is in principle to an allocation of land now with a reference as AL21 and AL22 (previously known as HA11 in the submission version Borough Local Plan – see maps in Annex), and other policies in the Local Plan which promote this allocation. OGFRA believes that the allocations should be removed from the Local Plan.

OGFRA maintains its previous objections. It has assessed the suite of documents which have been added as further evidence to the Local Plan, and resulted in the continued allocation with some small changes. This submission reconfirms previous objections and identifies as unsound the additional information now put forward by RBWM.



OGFRA's Objections

1. Green Belt removal

The NPPF paragraph 83¹ requires that “Once established, Green Belt boundaries should only be altered in exceptional circumstances...”. The Local Plan fails to justify the boundary alteration and is unable to demonstrate any “exceptional circumstances” which justify the large scale allocation here. It is therefore unjustified.

Paragraph 89 of the NPPF suggests that where Green Belt land is used for development it should be of appropriate scale and limited, which the allocation is not. Because of the splitting out of HA11 into two distinct sites, and retaining the 450 unit allocation at AL21, the proposed density here is likely to be 40/45 d.p.h (it is difficult to assess the net developable area, but the density will inevitably have increased) and the density on AL22 (Squires Garden Centre) is 53 d.p.h. These densities are inappropriate for the context and character of the area. This confirms that as previously concluded, the site capacity has not been adequately assessed.

RBWM decided to meet 100% of its Objectively Assessed Housing Need (OAHN) for the Plan period (2013 to 2033) in the Submission Version of its Borough Local Plan. RBWM, through the Housing Topic Paper (October 2019) has attempted to justify and to retain sites in order to maintain 100% of OAHN within the Borough boundaries. However, there remains little objective evidence that it has worked to successfully combine with the two other named authorities (Slough and South Bucks) to attempt to meet the agreed need within the EHMA – the east housing market area - for the provision of the required dwellings each year over the plan period.

The latest Proposed Changes document also goes further and has increased the target housing supply from 14,240 to 16,435, some 2,175 more than the OAHN. The Plan is therefore proposing that more than 2,000 new houses are planned, for which no actual need has been established and no explanation is provided.

Further, the Housing Topic Paper suggests that the plan proposes a limited number of Green Belt sites for housing, and that it attaches importance to the Green Belt. This is not apparent within the Plan, and is starkly illustrated by the inclusion of AL21 (and to a lesser extent AL22). It remains difficult to find evidence of the processes which RBWM adopted to choose sites within the Green Belt.

A Green Belt Review is notable by its absence, and has not been used to inform this decision-making. The allocation process for Green Belt sites therefore remains unclear to local residents and groups hoping to become involved in the BLP process, and once again this lack of engagement or wish to engage renders the plan-making process unsound.

This concern and lack of clarity over the allocation process is highlighted by the Borough's strong opposition to proposals to develop 21.75 hectares of Green Belt land at Lodge Farm, Holyport – a site that shares many of the characteristics of AL21 /AL22 and makes a similar contribution to the openness of the Green Belt.

¹ References in this document are to the NPPF 2012



2. Highways & Air Quality

The A308 is the main road connecting Windsor and Maidenhead and feeds the M4 at Junction 8/9 and also at Junction 6. The A308 (and surrounding roads) are already at capacity at peak hours. There is no evidence or explanation on how RBWM intends to manage the additional traffic created by the extra dwellings and employment facilities planned along the A308 and other activity/developments feeding onto the A308. The 'other activity/developments' impacting the A308 include: traffic generated when Crossrail commences operation and through the proposed expansion of Heathrow, major site allocations in adjoining Boroughs, the planned extraction of gravel at Water Oakley (and continued use of the treatment plant at Monkey Island Lane).

We face gridlock at peak hours if these additional dwellings are built and it will require capacity measures to accommodate any additional development, but this is not reflected in the BLP or any of the additional consultation material.

In March 2018 RBWM was awarded £90,000 (as part of a larger grant) towards a study to enhance connections and manage traffic along the A308 corridor. The work was to be undertaken in partnership with adjoining Councils and would assess the impact of increased development along the corridor and set out options to mitigate this. Over 18 months' later work on the study is only just starting. We have consistently argued that completion of the A308 corridor study should be a prerequisite to any development proposals along the A308, and it defies belief that this crucial study has not been undertaken. It is clear that transport issues are still only being considered as an afterthought to proposals for site and land use allocations in the Plan.

The range and extent of additional developments along the A308 also gives rise to serious air quality concerns. 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" and 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".

The BLP supporting evidence in the form of a Sustainability Appraisal recognises 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. It recognises that new development is likely to situate approximately 14,896 new residents within 200m of a major road and that new residents will live in areas where air quality is below the National Air Quality Objectives - with potentially negative impacts on the health of local residents. The proposed development in the Plan will further decrease air quality with associated negative health implications.

AL21 lies either side of and adjacent to the A308 and AL22 is directly on the A308 and on a roundabout – areas where there is standing traffic at peak times. Air pollution is certain to rise in these areas, but the Site Proformas (see Annex) make no reference to air quality (and necessary mitigation measures).

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". In relation to noise



pollution both sites AL21 and AL22 fall within areas where environmental noise is “likely to be significant”.

3. Site assessments

The allocation (AL21 and AL22) remains unsound as it is inadequately justified. Removal from the Green Belt depends largely on evidence which is conflicting, and incomplete. Neither AL21, nor AL22, should be removed from the Green Belt.

Despite an abundance of additional consultation material, it is not clear that alternative new sites have been fully considered. There remains a failure to co-operate with neighbouring authorities to find a reasonable solution which could better deal with a wider range of need in one site, rather than piecemeal development in numerous Green Belt locations.

The Site Allocation Proformas for AL21 and AL22, together with the previous Site Allocation Proforma for HA11 are shown in the Annex and the characteristics of the two sites are summarised below.

Site Allocation AL21

- there are no exceptional circumstances which would support this large area of land being removed from the Green Belt. Note that the size of the site needs to be checked as both AL21 and the previous (and larger) site HA11 are shown as being 27.76 hectares.
- the site lies either side of the busy A308 which suffers from congestion at peak times and the proposed development of 450 houses (together with a community hub, sports pitches and educational facility) will exacerbate already difficult traffic conditions. The A308 corridor study is only just (belatedly) starting and it is premature to allocate large areas of land within this corridor for development until the Study has been completed and its conclusions fully analysed.
- despite somewhat aspirational statements to ensure that the development is well served by public bus routes/demand responsive transport/other innovative public transport solutions, and to develop and implement a robust residential travel plan to minimise car trips – these are left to the developer and it is doubtful that significant mitigation of the traffic impact of the development will be achieved.
- the 450 houses and other facilities adjoining the A308 will also expose residents to noise and air pollution, with the attendant health risks - and any mitigation of air and noise pollution is left to the developer to resolve.
- the site provides a significant contribution to the gap (often referred to as the ‘Bray Green Gap’) between Windsor and Maidenhead valued by local residents. The Sustainability Appraisal states that the site makes “only a moderate contribution to Green Belt purposes”, but we maintain our contention that the contribution should be nothing less than ‘strong’ or ‘very strong’.
- the Site Allocation Proforma provides “conserve the best and most versatile soils on the site as far as possible and ensure that food production can continue through the provision of allotments or community gardens/orchards”, and we agree that best and most versatile land (BAMV) should be conserved and not used for development. It is therefore surprising to see that the land at AL21 is identified as BAMV in the Sustainability Appraisal, but no justification is given for proposing to develop this site; other lower quality sites should be considered.



- part of the site falls within Flood Zones 2 and 3, and the Surface Water Flooding Maps supports local knowledge that a large part 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.
- the Cardinal Clinic, an Independent Mental Hospital with 23 beds, day patient and out patient facilities serving both the local and extended community, is located in the south west corner of the site. The Oakley Green site was specifically chosen because of its tranquillity, with the surrounding open spaces of particular benefit to patients suffering from mental health issues. The Site Allocation Proforma still completely fails to acknowledge or recognise the importance of the Cardinal Clinic. Any development in the surrounding area is likely to have a highly negative effect on the facility and its patients, and ultimately on the long-term sustainability of the business.

Site Allocation AL22

- This former garden centre site of 0.74 hectares is in the Green Belt, and has a lengthy planning history. There has been strong local opposition to development of this site, and recently the Windsor Area Development Management Panel refused a revised application from Bewley Homes Plc and Square Bay (No5) LLP for the erection of 37 dwellings on this site because of its impact on the openness of the Green Belt.
- there are no exceptional circumstances which would support this area of land being removed from the Green Belt.
- the site lies on the busy A308 which suffers from congestion at peak times and the proposed development of 39 houses will exacerbate already difficult traffic conditions. The A308 corridor study is only just (belatedly) starting and it is premature to allocate large areas of land within this corridor for development until the Study has been completed and its conclusions fully analysed.
- despite somewhat aspirational statements to ensure that the development is well served by public bus routes/demand responsive transport/other innovative public transport solutions, and to develop and implement a robust residential travel plan to minimise car trips – these are left to the developer and it is doubtful that significant mitigation of the traffic impact of the development will be achieved.
- similarly, any mitigation of air and noise pollution is left to the developer to resolve.
- part of the site falls within Flood Zone 2 and the Surface Water Flooding Maps supports local knowledge that part of the site is prone to flooding. Any flood alleviation measures provided by the developer would be likely to increase the risk of flooding elsewhere
- the density of housing suggested by the Site Allocation Proforma, 39 homes on 0.74 hectares, equates to 53 d.p.h. which is a density far in excess of the surrounding area and wholly inappropriate.

Conclusion

OGFRA believes strongly that the current BLP has not been made sound by the changes proposed or additional consultation material provided and that the land allocations AL21 and AL22 should be removed from the Local Plan.

The Plan is not positively prepared – it does not meet infrastructure requirements for such a scale of development. It is not justified. The Plan now has a buffer of over 2,000 dwellings, which should be utilised instead of embarking on development of AL21 and AL22. It is not effective or deliverable due to lack of infrastructure. Finally, it is not consistent with national policy. Measures for environmental protection (where proposed) do not address the scale of the problem.

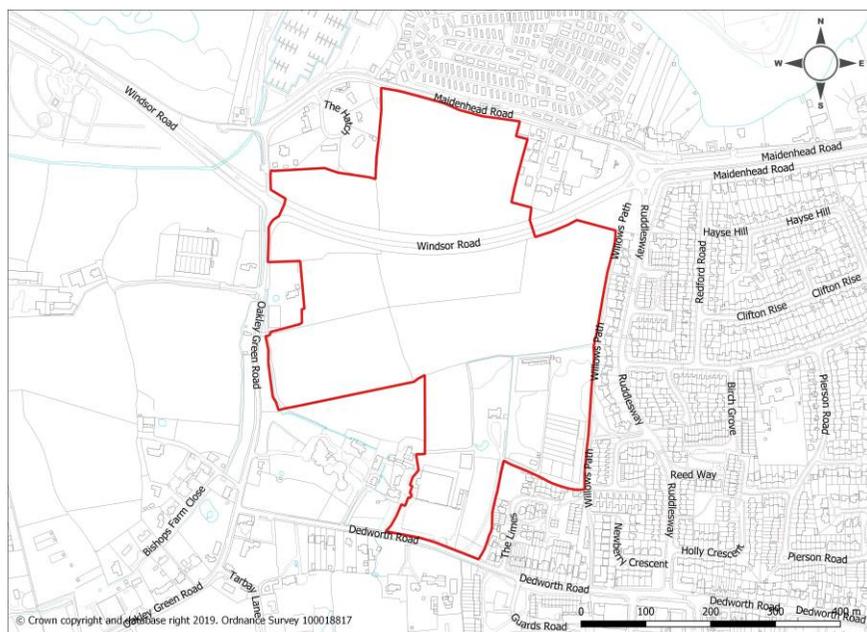


15 December 2019

This Submission is made on behalf of the Oakley Green & Fifield Residents Association. Contact by email at team@ogfra.org or by post to Martin Hall, Chairman, Oakley Green & Fifield Residents Association, No Oaks, Oakley Green Road, Oakley Green SL4 4PZ

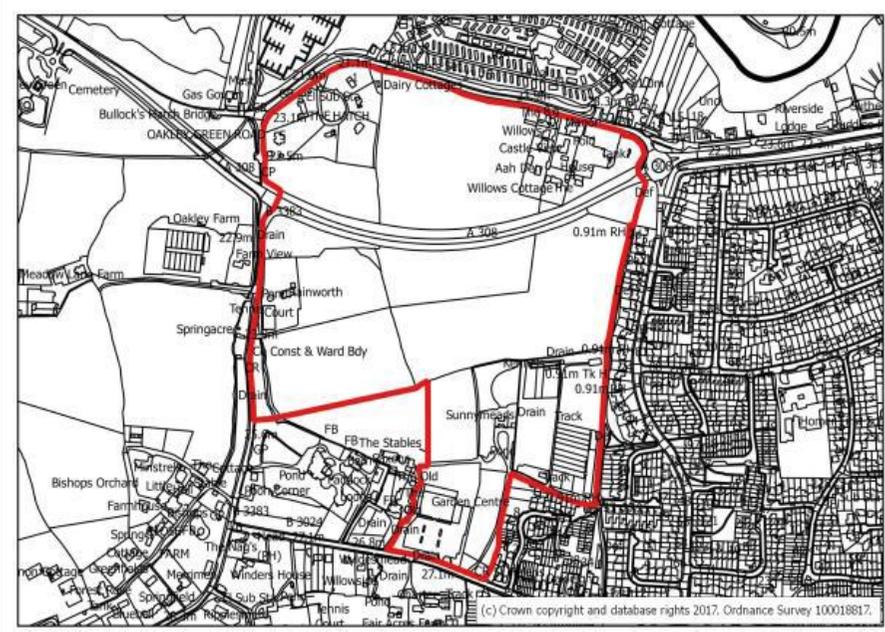
Site Allocation Proforma BLPSV-PC (2019)

AL21

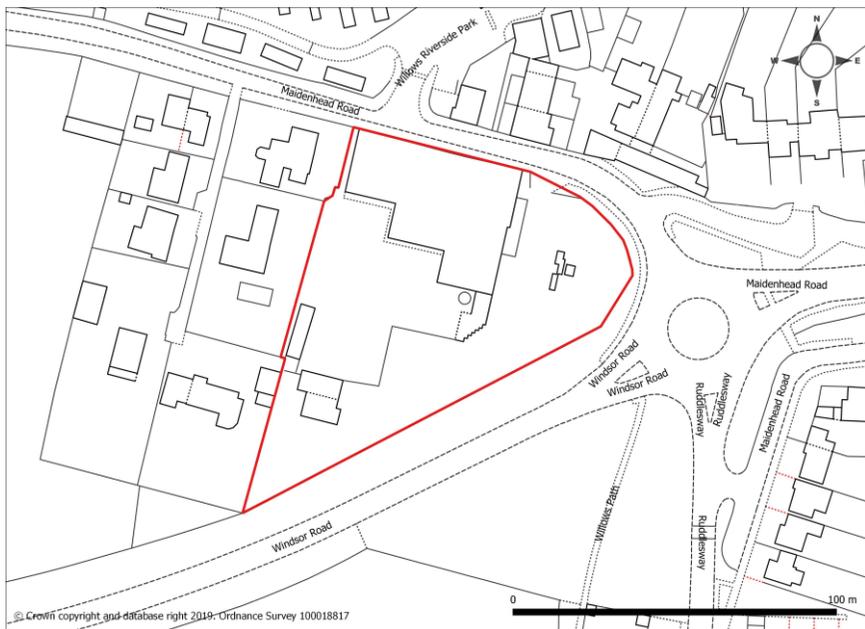


Site Allocation Proforma BLPSV (2017)

HA11



AL22



Allocation (AL21 and AL22)

AL21
 Approximately 450 residential units
 Strategic public open space
 Formal pitch provision for football and rugby
 Multi-functional community hub
 Educational facilities

Allocation (HA11)

Approximately 450 residential units on Green Belt land
 Strategic public open space
 Formal pitch provision for football and rugby
 Multi-functional community hub
 Educational facilities



<p>AL22 Approximately 39 residential units</p>	
<p>Site Size (AL21 and AL22)</p>	<p>Site Size (HA11)</p>
<p>27.76Ha (AL21) 0.74Ha (AL22)</p>	<p>27.76Ha</p>
<p>Site Specific Requirements (AL21 and AL22)</p>	<p>Specific Site Requirements (HA11)</p>
<p>AL21</p> <p>Development of the site will be required to:</p> <p>Retain the hidden nature of the site in the landscape through retention and reinforcement of existing tree belts and hedgerows along roads (especially the A308 Windsor Road) and by retaining low building heights that are reflective of local contextural heights.</p> <p>Be highly connected with surrounding streets and public transport corridors to ensure that the development integrates into the Windsor urban area</p> <p>Provide a highly permeable layout within the site focused on the strategic public open space</p> <p>Provide pedestrian and cycle links through the site and into surrounding streets and rights of way to improve connectivity</p> <p>Enhance existing pedestrian and cycle links towards Maidenhead and Windsor.</p> <p>Protect, enhance and increase public rights of way across the site</p> <p>Ensure that the development is well served by public bus routes/demand responsive transport/other innovative public transport solutions, with</p>	<p>HA11</p> <p>Appropriate edge treatment and transition to the countryside</p> <p>Provide pedestrian and cycle links through the site to improve connectivity</p> <p>Protect and enhance public rights of way</p> <p>Provide appropriate mitigation measures to address the impacts of noise to protect residential amenity</p> <p>Development to front the A308</p> <p>Retain valuable trees where possible, particularly at site boundaries</p> <p>Improve pedestrian and cycle links between the northern and southern parts of the site</p> <p>Designed to be of a high quality which supports and enhances local Character</p> <p>Key Considerations</p> <p>Flooding and surface water</p> <p>Heritage</p> <p>Landscaping</p>



<p>appropriate provision for new bus stop infrastructure, such that the bus is an attractive alternative to the private car for local journeys, including to local railway stations.</p> <p>Develop and implement a robust residential travel plan to manage travel to and from the site and reduce instances of single-occupancy car trips, including a car club for residents.</p> <p>Provide a strong green and blue infrastructure network across both elements of the site that uses existing trees, water courses and landscaping elements as its base framework. The Green infrastructure network will need to support enhanced biodiversity, recreation, food production and leisure functions.</p> <p>Ensure the strategic public open space is of very high design quality and is located in the southern parcel of the site with the community hub and educational facilities located near to or fronting the space.</p> <p>Retain valuable trees where possible, particularly at site boundaries</p> <p>Be of very high quality design and take design cues from the existing character of a series of fields enclosed by trees and hedgerows.</p> <p>Provide a series of character areas across the site, each focussed on an element of the green blue infrastructure network.</p> <p>Provide family housing with gardens, clusters of self-build plots and 40% affordable housing</p> <p>Ensure appropriate edge treatment and transition to the countryside</p> <p>Conserve the best and most versatile soils on the site as far as possible and ensure that food production can continue through the provision of allotments or community gardens/orchards.</p> <p>Consider flood risk as part of a Flood Risk Assessment as the site is partially located within Flood Zone 2 and 3 and bigger than one hectare</p> <p>Demonstrate the sustainable management of surface water runoff through the use of SuDS in line with policy and best practice; any proposed surface water discharge must be limited to greenfield runoff rates</p>	<p>On-site infrastructure provision and phasing</p> <p>Highways</p> <p>Biodiversity</p>
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Provide appropriate mitigation measures to address the impacts of noise to protect residential amenity
Undertake a minerals assessment to assess the viability and practicality of prior extraction of the minerals resource.

AL22

Development of the site will be required to:

Be considered as part of a wider area to enable comprehensive development and effective placemaking for the Windsor growth location. Enhance existing pedestrian and cycle links towards Maidenhead and Windsor.

Ensure that the development is well served by public bus routes/demand responsive transport/other innovative public transport solutions, with appropriate provision for new bus stop infrastructure, such that the bus is an attractive alternative to the private car for local journeys, including to nearby GP surgeries, leisure facilities, educational facilities and railway stations

Safeguard trees adjoining the site

Be designed to be of a high quality which supports and enhances local character

Front onto the A308

Consider flood risk as part of a Flood Risk Assessment as the site is partially located within Flood Zone 2



<p>Demonstrate the sustainable management of surface water runoff through the use of SuDS in line with policy and best practice; any proposed surface water discharge should be limited to greenfield runoff rates where feasible</p> <p>Provide appropriate mitigation measures to address the impacts of noise to protect residential amenity</p> <p>Ensure that the sewer systems including treatment works are sufficiently reinforced prior to the occupation and use of the housing.</p>	
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