



Old Windsor Parish Council

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Old Windsor Parish Council Response to Reg 19

This submission to the RBWM Regulation 19 Consultation is made by Old Windsor Parish Council. 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.

Old Windsor Parish Council was not consulted with on the formation of any of these policies.

‘Appropriate’ is globally used within the BLP and without a definition.

This Borough Local Plan could be transposed onto any other Local Authority Area in the UK.

A Green Belt review was not undertaken, other areas have shown that their OAN was excessive because of the percentage of Green Belt that fell within the Authority boundaries.

In Regulation 18 there was a stand alone townscape assessment that represented individual local communities. This has been removed from Regulation 19 to the detriment of local communities in helping define the character of their areas.

It has been absorbed into the generic, uninformative SP3

In Reg 18 there was a policy H05 that covered Housing Design and Layout. This has been removed and absorbed onto SP3

In Reg 18 there was a policy H06 that detailed Housing Density and Amenity. H05 now only deals with density with a preference for high density regardless of the character, needs or existing infrastructure. Amenity has again been absorbed into SP3 and is mentioned only briefly.

In Regulation 18 there was a policy NR1 that has been removed. This has been very inadequately defined and absorbed within SP3

In Reg 18 there was a policy H08 specifically covering building in residential gardens. This has been removed from Reg 19 leaving no protection from garden grabbing and inappropriate development. The Environment Agency states that building on back gardens in floodplain increases risk of flooding,

compromises water management, affects biodiversity, leads to overdevelopment and loss of green amenity. OWPC would like to see a separate policy covering such development.

SP3

Policy SP3 has been used to include many deleted policies from Regulation 18. SP3 is very vague and open to interpretation, it is more a vision rather than a policy. It doesn't reflect the varied characteristics and attributes of our communities

Old Windsor Parish council (OWPC) believe that the policies should remain separate, be more comprehensive and reflect the disparate community needs.

SP5 Green Belt

OWPC objects to the lack of cohesiveness and detailed guidelines in policy SP5. The lack of a comprehensive Green Belt Review, and all of the expected consultations, has resulted in a very vague and open ended policy. The Green Belt is there for a reason and should only be developed under special circumstances such as community facilities (schools, hospitals, sports centres). Housing estates and 5 bedroom mansions cannot be considered as a special circumstance. These need to be defined and not just covered by the NPPF.

Section 6.8.13 & 14

We are concerned that this negates the Green Belt Policy for areas that surround villages. Most villages have the odd built area outside the main settlement boundary and this clause seems to suggest that the green belt section, however large, between such built areas would be suitable for infilling. This goes against all Green Belt policy and needs to have a much tighter definition.

HO5-Density

OWPC objects to the policy HO5

The policy is far too open to interpretation with a lack of content and a bias towards high density. There are no restrictions detailed and places all responsibility on the community to make a counter argument.

NR1 – Flooding

Given many of the communities in RBWM are in areas of high risk of flooding it is concerning that this policy relies solely on the NPPF.

In section 12.2.3 goes as far as to state that "the effective implementation of the NPPF on development in areas of flood risk does not remove the presumption in favour of sustainable development.

We believe this is very short-sighted and this policy does not address the cumulative consequences of concreting over the flood plain.

Old Windsor has, in recent years, experienced significant flooding caused by surface water. The premise that any development under 10 properties does not have to provide a surface water management plan leads to multiple applications neighbouring each other and could seriously affect water management in the entire area

Section 12.2.2 states that advice will be sought from relevant flood risk management authorities e.g. Lead local flood authorities. The Borough IS the lead local flood authority so is it going to take advice from itself?

Parking

The omission of a Parking Standards Policy is of great concern.

Old Windsor has the highest car ownership in the borough. It is essential for the village to have a set minimum standard for new development.

The current parking strategy (2004) does not reflect the increase in car ownership within the borough and so is no longer applicable.

The omission of a parking policy suggests that it was put on the 'too difficult' pile and could be seen as an admission that it would be incompatible with development aspirations.

Transport

Lack of any specific information on how the existing road network will be adapted to meet the extra traffic congestion on our already clogged local road network. We have particular concerns about the impact on the A308 as it runs through the centre of Old Windsor. The slightest disruption to the flow of the traffic causes significant tailbacks turning the old Victorian road through Old Windsor into a rat run.

Water Supply and Infrastructure development

In regulation 18 it was IF6 now in regulation 19 it has been amalgamated into IF8 utilities. It is a non-strategic policy. OWPC has extensive knowledge of the drainage and sewerage problems in the village as it instructed a detailed survey into the Ham Island sewerage works. The result being that the sewerage infrastructure is already at capacity and will be unable to support new development. Why did the borough not consult the PC so that this knowledge could be shared? The borough's plan has not been informed by fact merely by intent.

NPPF states in paragraph 162 that infrastructure should be delivered in a timely fashion and PPG states that local authorities should "make CLEAR for at least the first 5 years of a local plan period what infrastructure is required, who is going to fund and provide it" yet in the IDP section 2.3.6 it states that a number of infrastructure partners and providers are still to provide information. How can the borough make a local plan or any decision about infrastructure regarding development when they have not got the information upon which to base the decision?

We are completely in agreement with the EA response and recommendations to the Regulation 18 and are extremely concerned that they have not been reflected in Regulation 19.

Affordable Housing

Changes between regulation 18 and 19 reduced the amount of affordable housing need to meet national standards, why? High land and house values surely mean our need for this is greater than national standards. The borough has cherry picked what it wants regarding housing. It aims to provide 100% OAN without doing a full green belt review yet suddenly decides to reduce affordable housing percentage required.

Why have smaller developments been excluded from the requirements to provide affordable housing?

There is no definition of 'Affordable', is it truly affordable to local residents and their families?

We are concerned at the lack of planning for Social Housing as this is nearly impossible to access within the borough.

Section 7.7.9 and HO3 states that in exceptional circumstances a viability study could be undertaken by the developer in order to justify not providing affordable housing. No mention is made of what exactly constitutes 'exceptional circumstances' High land values gives developers 'get out' clause.

The borough could GUARANTEE affordable housing if they leased the land that they owned to housing associations. Why have they chosen not to do this?

There is absolutely no provision for affordable renting.

Old Windsor Parish Council request to be included in any public hearings relating to the submission of Regulation 19.

Yours Faithfully

A handwritten signature in black ink, appearing to read 'J Lee', written in a cursive style.

Clerk to the Council

RBWM Borough Local Plan 2013-2033 Submission Version

Regulation 19 Submission from the following organisations:

Ascot, Sunninghill and Sunningdale Neighbourhood
Plan Delivery Group

Bray Parish Council

Bray Neighbourhood Plan Steering Group

Braywick Action Group for Maidenhead's Greenbelt

Fisheries Residents Association

Horton Parish Council

Oakley Green & Fifield Residents Association

Old Windsor Parish Council

Old Windsor Neighbourhood Plan

RBWM Residents Action Group

Rushington Area Residents Association

Society for the Protection of Ascot & Environs

SportsAble

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RBWM Borough Local Plan 2013-2033

Regulation 19 Submission

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