

BOROUGH LOCAL PLAN 2013 - 33 CONSULTATION DRAFT DECEMBER 2016

Next stage to Sec. of State Planning Inspector Examination. Response Deadline 13 January

I have studied 284 pages and summarise where they are relevant to us with main emphasis on Housing. Borough target is 14,298 to 2033. NPPF. Localism Act & Neighbourhood Plan drives all.

POLICY SP6/7: New Res. Dev. In GB only permitted 'within an existing settlement boundary', subject to 'protect and enhance distinctive character and heritage of its settlements and surrounding countryside', including 'limited infilling' or 'one for one replacement' providing not materially greater impact than original. Non – Res. re-use or replacement only permitted if existing building is 'permanent & of substantial construction' without 'extensive reconstruction or material change in size or scale' and proposed use not to have a 'materially greater impact' on 'openness or purposes of GB' Importantly previous GB 1-8 policies go and are substituted by 'key countryside principles' which seek to 'protect, enhance and conserve the environmental quality, natural beauty and historic/cultural heritage of RBWM'. VSC is required to justify dev. adjacent to an existing settlement where 'existing community infrastructure' can be used, 'respect for character and appearance and landscape of countryside setting' and no unacceptable increase in activity or traffic - it is anyway contradicted in para 6.8.7 p49 which refers to 'urban balance' and 'modest' GB (we are deep!)

EG: COOKHAM & HORTON

POLICY HO 2/3: Need for 434 new 'affordable homes' each year with recognition that in GB this is likely to be limited to 'RURAL EXCEPTION SITES' where there has to be a 'proven local need, well related to an existing settlement, not located in open countryside, respect characteristics of local area and countryside setting with school, health, shops, community facilities within reasonable travelling distance'. It is 'community led

POLICY HO 4 Relates to Gypsies & Travellers intended to deliver up to date and evidence based pitch target with 'health, retail, school facilities and which must not harm the landscape or rural character in particular the GB and not located in a flood zone'. A 'housing needs and provision' separate policy statement is being prepared in conjunction with adjoining LPAs to take into account 'recent legislative changes'. Policy NR3 on 'managing flood risks' is especially relevant as dev. 'must not impede flow of flood water' or 'increase number of people or property at risk of flooding'. A 'Gypsy & Traveller Local Plan' is awaited 5.2.4 p30.

POLICY HO 8/9: Deals with devs involving res. gdns and only applies to areas outside GB whilst 'within GB disproportionate additions to buildings and creation of outbuildings are inappropriate unless VSC outweighs harm' (former GB4).

POLICY SP5: 'Quality of Place' is a mish-mash of River Thames, GB, Ag dwellings and outdoor sport/recreation. There is encouragement of equestrian uses (paras 6.8 19-25) subject to no floodlighting, highway safety, landscape quality, stable siting/construction.

Previously Developed Sites – meant to have a separate policy? But definition in glossary excludes Ag buildings, recreation land or allotments and para 6.10.4 states 'subject to the normal GB tests', whilst para 11 p40 states 'acceptable in principle subject to assessment of impacts and mitigation measures arising from the development' (e.g Bellmans Hanger). Policy HO6 on 'Housing Density & Amenity' refers to 'satisfactory residential amenity for both proposed accommodation and nearby residential properties' as well as 'location accessibility, availability of services, facilities and infrastructure', also 'adequate living space, standard of privacy, satisfactory outlook, level of sunlight, outdoor amenity space, not subject to nuisance or contamination'. Policy IF3 seeks to minimise travel and vehicle trips

– encourage public transport. Policy EPI dev should be ‘well away’ from livestock: (adjacent farm!). Policy IF6 places onus on developer to carry out study to prevent ‘overloading existing sewerage infrastructure’.

HISTORIC ENVIRONMENT: 11.2.3 says a ‘Historic Landscape Character Assessment’ relating to villages and hamlets is being prepared

NATURAL ENVIRONMENT: Policy NE3 seeks to protect trees, woodlands, hedgerows and protected species

OPEN SPACE STANDARDS: p167 gives useful guidance e.g Shurlock Road

NATURAL RESOURCES: the first, and only ref to WSL ‘has flood risk owing to Twyford Brook and The Cut tributaries of the Thames and is therefore a constraint to development’

POLICY HE2 LISTED BUILDINGS: devs should seek to enhance and conserve heritage assets. RB will only support dev. that reflects significance of a LB and its setting and alterations/extensions not to adversely affect character or setting and requires justification.

POLICY HE6 CONSERVATION AREAS: ‘Dev. will need to conserve or enhance the character and appearance, and contribute positivity to the character, distinctiveness and significance of the historic environment; of high quality design/sympathetic to the siting, avoid intensification of activities in the area, appropriate to the overall character, not include important open spaces and protect views’

RESPONSE

1. Overall extremely comprehensive and well written but constant repetition (perhaps necessary) and difficulty in following a logical sequence of policies when listed buildings and conservation areas have so much to do with development
2. ‘Quality of Place’ is an odd description and could just as well include both LB & CA policies
3. Spatial Portrait meaningless & dictionary defines spatial as space!
4. Green Belt section on Res & Non Res does not cover re-use of AG buildings for residential (as in Q) ‘be’ is missing in 5.5.7
5. ‘Previously Developed Sites’ needs a separate policy as it states in 6.10.4 and ‘subject to normal GB tests requires a brief relevant summary
6. ‘List of Policies’ should include page nos to assist identification and ‘Glossary’ should include CA definition – it is appendix D not E (11.11.2)
7. Environmental Noise/Protection (EP4) should protect near residences from clay pigeon shooting and motor cycle scrambling events
8. Historic Environment – conservation & heritage 11.2.3 p 101 is keenly awaited and it is hoped will highlight the hugely significant widening of the WSL CA designed to protect the setting of two dozen listed buildings and unusual open spaces in the village street as an added safeguard to inappropriate development.

CSH