WWRA Review of the RBWM new BLP (Borough Local Plan) preferred Options 2014

Introduction

This review has been undertaken by the WWRA (West Windsor Residents' Association), which has been established since 1962 and currently has 1083 Household members. In February 2014, 1600 households were invited through our AGM newsletter to respond to the RBWM public consultation and invited to a public/AGM meeting on 3rd. March, at which 150 attended. In addition, the Management Committee were also asked to consider the following points/aspects:

- ➤ It's Features Does it cover what you expect it to/should do (see next point)?
- It's **Performance** both as a Plan, and, what BLP is going to deliver [or not?] (In thinking about this, you may like to ponder the overall purpose of a **Local Plan**, for example; Is it for Spatial/property/land use & development? or To improve the quality of Living & working in a local Council area?
- It's **Ease of Use** is it user friendly and likely to be so over its 15 year life?
- ➤ It's **Value for money** as a resident (and Council Tax payer), would you 'Buy' this Plan, if not why not?

The views, comments and suggestions that have been made, as would be expected, are largely from a Windsor perspective, and, West Windsor in particular. In addition to the 'Content' proposals offered in this new BLP, some of our members took the opportunity to comment on 'process' aspects, as well.

Review Overview and Summary on the new BLP

[1] Is this BLP a Plan? No it's not, it's more of a framework with strategic intent and perhaps it should be, in that it is required to mirror/align with NPPF (the National Planning Policies Framework) – so maybe BLP should be renamed *The Borough Planning Policies Framework & Strategies for development 2014 – 2030*, RBWM describe it thus - 'The Borough Local Plan when adopted will set the long-term strategy for managing development and supporting infrastructure up to March 2030'.

<u>A Plan</u>, on the other hand, basically sets out to answer the questions: Who does what and by when? It is more tactical in nature, maybe this is the job for Neighbourhood Plans?, i.e. they are more likely to be 'localised' and will focus more on tactical deliverables, e.g. what number, quality and economic style of housing will be built by when?; What transport/roads infrastructure and visitor accommodation will be developed/improved to handle, say, 8.5 million visitors per year to 'Windsor World' tourist attractions in 2027/30?

[2] The Structure of this 'plan' is poor, disjointed and unbalanced, in as much as it does not appear to be very well thought-through in the development of a more coherent and inter-related set of solutions & developments for addressing the likely *ESE(Environmental Social Economic*) challenges to be met in the next 15 years. This is especially apparent for the Windsor area, both for the local economy (principally tourism) and the proposed new homes (possibly 1000+ in the W.Windsor/Oakley Green area, and, their impact upon both the natural environment, together

with the local infrastructure (principally roads & public transport, plus new community facilities (schools, medical facilities). Better Scenario planning/What ifs need to be undertaken in, for example: [1] The impact of further developments at Legoland, upon both additional visitor accommodation & transport, plus local road traffic capacity and congestion; [2] The access and use of the new cross-rail terminal in Maidenhead, especially for current West Windsor residents and the proposed 'edge of settlement' developments (10,000 potential users could find it a better service/facility to use than central Windsor rail links, but, accessing it by current public transport services could be a major deterrent).

This 'Plan' therefore fails to fully identify, demonstrate understanding of likely requirements and hence offering solutions to the likely **ESE challenges** foreseen, and hence, the requirements that need to be addressed (other than in the area of housing, where most of this 'Plan's' efforts seem to have been directed in 'planning' to meet HMG (Her Majesty's Government) target(s) for new homes).

There needs to be more joined-up thinking/planning in providing better integrated holistic ESE solution(s) for Windsor (It is now a major part of the UK tourist Industry – not a side-show!)

[3] The 'Plan' is not specific enough [yet?] (other than in housing proposals) to realistically consider the implications 'on-the-ground', overall it's largely aspirational & desirability orientated, with objectives & policies using criteria that are not (in many cases) measurable, e.g. adequate, satisfactory, reasonable, quality, diversify, good access, adequate living space and sufficiently significant (to name but a few). Basically, this new BLP is not SMART enough (Specific, Measurable, Achievable, Realistic and Time-related) in order to make any real informed decisions toward its likely success, or feasibility.

Who is going to decide what is satisfactory, adequate living space and/or sufficiently significant? It seems that much of this 'Plan' has been produced for the use of the Planning bureaucracy. It lacks any real end-use by the community in order to <u>understand and decide</u> how any vision, aims and objectives are likely to be achieved. This 'Plan', in terms of any specifics, is very much centred upon housing development and nothing much else.

[4] What is the purpose/focus of BLP? — It says.... 'to meet the environmental, social and economic challenges facing the area up to March 2030. Ultimately, the Borough Local Plan will be used to make decisions on planning applications. It will also be the starting point for more detailed guidance and neighbourhood development plans'.

What this new BLP seems to be weighted toward is for spatial/property/land use & development, and in particular, housing. This is illustrated by the amount of page space devoted to this subject in the BLP document, of the 151 pages in the main body of the document, 30 are devoted to Housing, as against 5 for Economy, with Tourism getting 2 pages, Community Facilities 1 page, together with 1 page for Sustainable Transport!- more on these aspects later. Hence, it has be questioned whether the balance of BLP is right.

With recent press reports from the Governor of the Bank of England and the Chancellor, stating that the UK economy is, both fragile and unbalanced, it has to be asked therefore of the BLP process and management, whether or not the development of the local economy, as outlined in this new BLP, is possibly being driven too much on the back of housing & property development, leading probably to a repeat of the type of economic performance enjoyed & suffered by the UK

over the last 40 years, namely consumer driven, through the housing market & property development.

As the saying goes — 'If you do what you've always done, you'll get what you always got.' This then raises the question, what is 'sustainable development', and hence, a sustainable economy? With this appearing to be a key factor, which is not defined in the Glossary of Terms (or elsewhere), this aspect appears to be a central decision-making mechanism for much, if not all, that is covered in this new BLP, as outlined in Preferred Policy Option BLP 1.

'Planning law requires that applications for planning permission must be determined in accordance with the development plan'. This then, raises the questions of the viability & desirability of the development plan[s]? (Which in RBWM's case is presumed to be this new BLP, together with neighbourhood development plans and detailed guidance? – What is the decision-making process for the finalising of development plan(s)?

The danger perceived from reviewing these new BLP Options is, that there is an over reliance, yet again, on housing & property development as the key driver for the economy. Given the current state of the UK economy, and particularly, the issue of affordable housing, there now should be a major question mark over the quantity & type of housing to be potentially 'provided for' by this and/or other 'Local Development Plan[s]'. This question, together with affordability and, given the recent Thames Valley flooding crises, raises a major issue of the future economy's need for a more rational use of a scarce land resource, especially within the Windsor area, (see later point regarding the Crown Estate).

[5] The development of the local economy (principally Tourism), both nationally and locally, needs more consideration and hence planning. Much of the structure/topics of NPPF are reflected in the new BLP. What is not evident, and especially from a Windsor perspective, is the combination of 'building of the economy', 'enhancing the historic environment' and the development of tourism. The UK economy over the next 15 years is likely to see tourism moving up the economy agenda, yet there is no strategic marketing planning/research evident in this new BLP, and hence, an apparent lack of RBWM Planning 'to business plan' this aspect for the future. For example; what are the development/growth plans for Legoland (or LegoWorld as it will probably become) over the next 15 years (Lego is now an international world brand and set for major growth). The implications for the local Windsor resources and infrastructure (transport, roads, accommodation) need to be anticipated, there are no specific proposals, within this new BLP, to make any informed decisions on these aspects(for example; the development of P+R facilities?).

Therefore, <u>a more positive approach</u> is needed toward the development of the local economy, especially tourism centred on Windsor and the infrastructure requirements. For example: a reevaluation is needed of the industrial/warehousing space currently within the Windsor town area, e.g. Vansittart Industrial Estate, and the requirement for the army 'to warehouse' with <u>two</u> barracks (by 2020 the Army will have reduced by 20%) This land space could be better used to develop Windsor's tourism industry. Additionally, the investment made at Eton Dorney for hosting the 2012 events (£3.8m. of tax-payer money), has not produced a legacy for either the local community/economy or indeed nationally for use of this Olympic-standard sports venue/facility. This is reinforced by omission in this 'Plan' of any mention of the 10-year project to build a permanent footbridge across the Thames at Sutherland Grange, for which RBWM are currently supporting through Cabinet approval and a participatory budget award. This infrastructure development would deliver a range of benefits covered by the new BLP's aspirations, namely environmental, health, leisure, sport, open-space access and green transport (through cycleway

development, walking and a major reduction in car use by West Windsor(potentially some 10000) residents in gaining access to the Thames river environment and open-space/leisure facilities beyond.

- [6] Enforcement of Policies, Standards and Rules Whilst specifying policies and certain standards to be adhered to, is admirable, the basic question is, are they enforceable. This is especially needed in the area of Developer Contributions, toward providing infrastructure/community facilities. A current example being the re-development of *The Parade* in West Windsor, where the provision of a replacement retail unit is a condition upon the developer to provide, as part of planning approval for new houses. Yet the current business owner of the of retail premises to be re-developed has been offered a price that effectively 'prices him out of business', which will lead to no retail unit operation, loss of jobs and a valued community facility. The developer will have cynically complied with the planning approval, but in reality will not have made any contribution toward the ongoing provision of a local community/business facility.
- [7] Ease of Use This 'Plan' document as presented, is not 'lay user-friendly' there are too many reference jumps around the document, and into external documents. Plus, use of terms and language, e.g. a Policy on having a Policy! This is not currently suited to many residents or small business owners (non-expert) and is perceived to have been produced largely for the professional planning bureaucracy. It is suggested the whole 'Plan' is re-structured and written around more end-user requirements, i.e. who needs what, with what, by when? Also, it needs to be produced for specific areas, e.g. Windsor, Ascot & the Sunnings, Maidenhead, etc., and potentially needs to 'back-fit'/a clearer driver for current Neighbourhood Plans & planning work.
- [8] Value for money? The feeling is that it is not! For the reason of the comments & observations made to date. Two key questions remain, what ESE challenges and requirements must/should/could to be met? And how is this 'Plan' going to deliver them over the next 15 years? Currently, the view is not very much, other than 7000+ (or possibly less) new homes and some redevelopment of Maidenhead town centre, together with the coming of Cross-rail!
- [9] The options and proposals outlined in this 'Plan'/Strategies document do not sufficiently rise to the ESE challenges needing to be addressed. Greater leadership and innovation is required (the Vanguard role) toward development of the local area's future ESE needs and opportunities. For example; a more imaginative approach to encouraging the use of 'green' technologies for domestic power generation, and, transport (especially public).

Sectional – Comments & suggestions

Within this part of our report we have provided feedback specifically related to the various sections of the new BLP, both to the questions posed and any additional views gathered from our review population.

Section 3 - Vision and Objectives

Question 1

Do you support the draft Borough Local Plan Overall Vision? Do you have any comments? – It needs to paint a more positive and motivating picture of the key aspects, uniqueness and value of the assets in the area, e.g. the historic, parkland, Thames valley river landscapes, together with its excellent communications and links to the UK's motorway, rail and airport facilities. It needs to provide more of an inspiration to daily living & work, plus the strategic decision- making required of RBWM, which provides an enduring destiny for the businesses, organisations and people who wish to thrive for a future that delivers a safe, healthy and prosperous environment. The writing/wording needs to engage more feelings, in order to help visualise/imagine an energising future. The statement is too long, disjointed and needs to harmonise key aspirations into a more positive 'building' structure, e.g. 'We will fight them on the beaches, the landing grounds and in the hills, we in these islands will never surrender....'

Question 2

Do you support the objectives? Do you have any comments? – Whilst they do focus on some aspects and areas covered in BLP, for example, objective #1; 'Conserve and enhance the special qualities....' Not all areas in BLP have any specific objective upon which the planning process needs to work/deliver, e.g. Historic Environment. The objectives that have been specified do have actionable criteria, e.g. conserve, enhance, promote, and increase. However, what they lack are criteria for measuring, judging whether or not the objective is realistic, or indeed, achievable. Hence, what arises from the omission of these sorts of criteria is deciding what actually will be delivered by BLP on or before 2030.

This is also reflected throughout BLP, with terms such as satisfactory, adequate, sufficiently significant and reasonable – these terms when used to make decisions, make it almost impossible to know whether or not the expectations of the parties involved in a particular aspect or issue have been fulfilled. Hence, there needs to be more measurable criteria in determining, for example that 'satisfaction' has been delivered or not, how much 'reasonableness' has been reached?

4 - Strategy

Question 3

Do you support the preferred strategy of providing a sustainable balance between housing and social needs and economic needs, whilst protecting the quality of the environment and the Green Belt (this would require development in some parts of the Green Belt where environmental impacts are considered to be limited)? We broadly disagree with edge of settlement developments on the Green Belt areas proposed. The following is the voting analysis made at the public meeting on 3rd. March:

- [1] For two garden centres (Wyevale and Squires) to be retained? 80%
- [2] For one garden centre to be retained? 100%
- [3] To retain Wyevale garden centre? 40%
- [4] To retain Squires garden centre? 60%

There was a clear preference that if a garden centre was kept it would be **Squires** over Wyevale.

- [5] Do you approve that housing should be built on land south of Dedworth Road and west of Broom Farm Estate? In favour: 5%, against: 30%
- [6] Do you approve that land between Dedworth Road and A308 including Wyevale should be built on? In favour: 8%, against: 40%
- [7] Do you approve that land north of A308 with Squires to Oakley Court Road should be built on? In favour: 5%, against: 50%

If you prefer one of the alternative options then please explain why.

Question 21 in Chapter 7: Housing invites views towards how the suitability of sites in the Green Belt should be assessed and requests views on specific areas.

Question 4

Do you support the three components of:

- 1. Maintaining an environment that conserves the special qualities of the borough's environment and places. *Maintaining is probably not good enough!*
- 2. Optimising the efficient use of land, particularly land within and in proximity to town centres and other land which has previously been developed; efficient use suggests least cost, it does though also need to consider effective use, i.e. the benefits to be gained, for example, of building homes and/or a hotel on the site of Combermere or Victoria barracks might be both efficient through conversion of existing structure, and, beneficial to the local economy.....and
- 3. Promoting a strong network of town, district and local centres which are at the heart of the community, providing shopping, services, employment and leisure, Do you have any comments? To promote a strong network, there needs to be efficient (greener), effective and convenient interconnection between centres. Given the aim to reduce car usage in the area, the local public transport network therefore needs to be significantly developed. In particular, the need to create a strong 'spine connection' between Maidenhead -- Windsor(based on the A308), enhancing any new housing developments in W. Windsor/Oakley Green, the new Cross-rail terminal, plus serving any new hospital (plus a possible P+R) in the M4/A308 junction Triangle site, plus the additional tourist/visitor traffic envisaged. This 'spine' linkage should be operated on a shuttle basis, every 7/10 minutes, using new electric tram/light railway/or robotic 'taxi' Pod technology (as currently operated at Heathrow T5 parking).

Question 5

Presumption in Favour of Sustainable Development

Are there any aspects of Policy BLP1 on which you wish to comment? This whole aspect of sustainable development and the operation of this policy is caught up in a concept that needs much clearer definition and explanation, and hence, measurement criteria.

Question 6

Community-Led Development

Do you support the principles and preferred approach included in preferred policy option BLP2?

<u>The W. Windsor Wards of Clewer North & South were removed from the operation of this policy in April 2013, having been a part of the W&E Neighbourhood Plan up until that date</u>

Spatial Strategy – comment: It has been noted from the Inspector's report into RBWM's 2006 Core Strategy proposals(upon which it has been assumed this new BLP is based) that; "In terms of Windsor and Maidenhead's equal billing in the settlement hierarchy, I note that this arrangement reflects their equal status as Secondary Regional Centres in the South-East Plan. Nevertheless I consider that there are compelling grounds for placing Maidenhead above

Windsor in the hierarchy. Put simply, Maidenhead is a much larger and to my mind more sustainable location for additional development. The Core Strategy itself anticipates that about half of the total housing provision up to 2026 will take place in the town and it also has a much higher affordable housing need. It is also more important in general business terms. Maidenhead's selection as the terminus for the Cross-rail project could further emphasise its relative importance in years to come. To my mind, identifying Maidenhead as the top tier in the hierarchy more accurately reflects the Core Strategy's spatial objectives and the evidence base......My overall conclusion is that the Core Strategy is not sound....'

5. Quality of Place

Question 7 Design

Do you support the principles and preferred approach included in preferred policy option PLA1? Why wouldn't we, this whole subject is very much based on taste and technology, how you get the right solution, is open to question. For example, the facia on the redeveloped King Edward Court building, facing down Arthur Road, is a poor example of design/materials integration with a Medieval/Victorian technology built/style town.

Question 9

Townscape and Landscape

Do you support the principles and preferred approach included in preferred policy option PLA2 Why wouldn't we?!

Question 10

Thames Riverside Corridor

Do you support the principles and preferred approach included in preferred policy option PLA3? Yes, and where in BLP is the current project for the Windsor Legacy Bridge, that demonstrates a deliverable on this aspect?

6. Green Belt and Countryside Character

Question 11

Green Belt

Do you support the principles and preferred approach included in preferred policy option GBC1? Why wouldn't we?!

Question 12

Minor Adjustments to the Green Belt

Do you support or object to any of the minor adjustments to the Green Belt as listed in Appendix B? *No, we do not object.*

If so, which area(s) and why?

Question 13

Countryside Character

Do you support the principles and preferred approach included in preferred policy option GBC2? Yes

Question 14

New Residential Development in the Green Belt

Do you support the principles and preferred approach included in preferred policy option GBC3? Yes

Question 15

Reuse and Replacement of Non-Residential Buildings in the Green Belt

Do you support the principles and preferred approach included in preferred policy option GBC4? Yes

Question 16

Equestrian Development in the Green Belt

Do you support the principles and preferred approach included in preferred policy option GBC5? Yes

Question 17

Major Developed Sites in the Green Belt Do you support the principles and preferred approach included in preferred policy option GBC6? *Yes*

7. Housing

Question 18

Amount and Distribution of Housing

Question 3 in Chapter 4: Strategy invites views towards the preferred strategy of balancing housing and social needs and economic needs, whilst protecting the quality of the environment and the Green Belt.

Are there any other aspects of preferred policy option HOU1 on which you wish to comment?
Settlements hierarchy - It has been noted from the Inspector's report into RBWM's 2006 Core
Strategy proposals (upon which it has been assumed this new BLP is based) that; "In terms of
Windsor and Maidenhead's equal billing in the settlement hierarchy, I note that this arrangement
reflects their equal status as Secondary Regional Centres in the South-East Plan. Nevertheless I
consider that there are compelling grounds for placing Maidenhead above Windsor in the hierarchy.
Put simply, Maidenhead is a much larger and to my mind more sustainable location for additional
development. The Core Strategy itself anticipates that about half of the total housing provision up to
2026 will take place in the town and it also has a much higher affordable housing need. It is also
more important in business and economic terms. Maidenhead's selection as the terminus for the
Cross-rail project could further emphasise its relative importance in years to come. To my mind,
identifying Maidenhead as the top tier in the hierarchy more accurately reflects the Core Strategy's
spatial objectives and the evidence base......My overall conclusion is that the Core Strategy is not
sound....' We agree with this conclusion both then and now.

Question 19

Allocated Housing Development Sites

Do you support the allocation of the sites listed in Table 4 and Table 5 for housing? Maps showing the sites are provided in Appendix E Please comment on individual sites as necessary. — The Squires Garden centre should not be re-developed, because: [1] If the Wyevale Garden Centre is developed then there is no social/economic facility of this kind in W. Windsor [2] The site is at risk of flooding.

Question 20

Sites in the Green Belt

How important do you consider the following factors to be in considering the suitability of areas in the Green Belt for housing?

Please circle the number which most accurately reflects your view on each factor – 5 being of the highest level of importance and 1 being the least level of importance. This will help us to understand which of the following are of most importance to you.

Avoiding areas which are more distant from services and facilities 1 2 (3) 4 5

Avoiding areas with higher quality agricultural land 1 2 3 4 (5)

Avoiding areas which are more important for wildlife 1 2 3 4 (5)

Avoiding areas which are visually more prominent within the Green Belt 1 2 3 4 (5)

Avoiding areas which are at higher risk of flooding 1 2 3 4 (5)

Avoiding areas which are visually more prominent from within historic areas 1 2 3 4 (5)

Avoiding areas where gravel or sand could be extracted in the future 1 2 (3) 4 5

Avoiding areas with lower environmental quality such those affected by noise 1 2 3 4 (5)

Do you have any views specific to the areas listed in Table 6? Maps showing the areas are provided in Appendix F. Please comment on individual areas as necessary; *Area North of A308, south of Maidenhead Rd, W. Windsor – valued Community facility, plus it a Flood risk!*

Question 21

Triangle enclosed by M4, A308 (M) and Ascot Road, Maidenhead

Do have any views on the use of the area enclosed by the M4, A308(M) and Ascot Road for residential development and/or hospital-led development? Please comment on each as necessary – Strongly support the development of a new Thames Valley Hospital centre, replacing Wexham Park & Heatherwood, together with a major P+R facility to serve both Windsor/Maidenhead centres and the new Cross-Rail services terminal at Maidenhead Station.

Question 22

Meeting a Range of Housing Needs

Do you support the principles and preferred approach included in preferred policy option HOU3? *Yes*

Question 23

Affordable Housing Thresholds

Do you support the principle of lowering the threshold at which a proportion of affordable housing would be required in developments? *Yes.*

Do you have specific comments regarding the preferred approach of preferred policy option HOU4? No

Question 24

Affordable Housing Shared Equity

Do you support enabling people to own a proportion of their home? Yes.

Question 25

Affordable Housing Rural Exception Sites

Do you support the principles and preferred approach included in preferred policy option HOU5? *Yes.*

Question 26

Gypsies, Travellers and Travelling Show People

Do you support the principles and preferred approach included in preferred policy option HOU6? *Yes*

Question 27

Protection of Residential Land and the Housing Stock

Do you support the principles and preferred approach included in preferred policy option HOU7? *Yes*

Question 28

Housing Layout and Design

Do you support the principles and preferred approach included in preferred policy option HOU8? *Yes*

Question 29

Housing Density

Do you support the principles and preferred approach included in preferred policy option HOU9? <u>Observation</u> – With more density, there is a requirement for providing open-space access for people to obtain a range of facilities/uses for health and well-being benefits.

Question 30

Conversion of Dwellings

Do you support the principles and preferred approach included in preferred policy option HOU10? See answer to Q29.

Question 31

Development Involving Residential Gardens

Do you support the principles and preferred approach included in preferred policy option HOU11? Yes

Housing – A Further comment; From a Windsor perspective there needs to be a review of the contribution by the Crown Estate toward local housing development, and in particular affordable housing. Current reviews by HMG into Crown Estate property development responsibilities, suggests CE can/should do more in this area.

8. Economy

Question 34

Economic Development

Do you support the principles and preferred approach included in preferred policy option EC1? – Overall yes – however, there is already empty office space in both Maidenhead & Windsor. There needs to be a more innovative approach by the planning authorities toward more flexible/adaptable building design and structure/use, in as much as flexible structures need to be encouraged to offer multi-use and adaption, i.e. single and/or mixed use for apartment and/or office space that can physically expand/contract to meet demand, without major structural re-building work.

Question 35

Defined Employment Sites

Do you support the principles and preferred approach included in preferred policy option EC2? – A re-evaluation of the industrial/warehousing space currently within the Windsor town area, e.g. Vansittart Industrial Estate and the army's 'warehousing' with \underline{two} barracks, is required in light of the need for expanding visitor accommodation in Windsor (see later section comments re: Tourism).

Question 36

Other Sites and Loss of Employment Uses

Do you support the principles and preferred approach included in preferred policy option EC3? Yes

9. Town Centre and Retail

Our response to questions 37, 38, 39, 40, and 41 – is broadly, yes

10. Tourism

What is not evident, and especially from a Windsor perspective, is the combination of 'building of the economy', 'enhancing the historic environment' and the development of tourism. The UK economy over the period of the new BLP is likely to see tourism moving up the economy agenda, yet there is no strategic marketing planning consideration and hence RBWM Planning 'to business

plan' this aspect into the Local Plan[s] for the future, for example: what are the development/growth plans for 'Windsor World' over the next 15 years (For example; Lego is now an international world brand and set for major growth)? Yet, the implications for the local economy and infrastructure (transport, roads, accommodation) do not seem to have been considered/addressed in this new 'Plan'.

Hence, there is a need for a more positive planning approach toward the development of tourism and especially a more focused and marketing-led plan for what might be called a 'Windsor World 2030' scenario, with a much better integrated public/visitor transport network system for the tourist area[s] and the attractions that will have to cope with future growth. It needs to offer both the visitor and local residents a better, and desirably a unique experience of accessing and moving around, rather the disjointed, gridlocked and stressful conditions currently 'enjoyed'.

The wording in policies TM1 & 2 reflect an almost 'laissez faire' approach, for example, to encourage (should read, to promote and 'build') and to support new...(should read, to facilitate and encourage visitor accommodation.)

11. Historic Environment

This aspect very much reflects our 'jewel in the crown' asset for the area, and in particular, for Windsor. It goes without saying therefore that all the policies and work is supported. In addition, further pedestrianization should be under-taken/completed in lower Peascod Street, and, from the top of Peascod Street down Thames Street to River street junction.

12. Natural Resources

This is supported as necessary. Development of PV in the Borough needs more positive development/support.

13. Environmental Protection

- [1] Need to re-think the flood risk proposals, particularly to down-stream communities such as Datchet & Wraysbury, plus there are implications for any further development of LHR (moving the water stream/flood is not enough- there needs to be more up-stream development/measures)
- [2] More positive measures are needed to toward traffic pollution. Use of permit type controls, as being implemented in many German cities and large urban areas needs to be considered, together with better greener public transport.
- [3] A more proactive approach is needed by RBWM to the proposed expansion of LHR.

14. Natural Environment

- [1] More greening & screening of the built environment is required through more extensive tree planting, to reduce and soak up noise, CO2, excess water and brick & mortar hard-lines and reflective properties, for example: Royal Windsor Way (the dual carriageway Relief Road), A308 and Dedworth roads need tree planting to better 'insulate' properties. It would also help absorb aircraft noise and pollution.
- [2] Open space in West Windsor has been eroded over a many years with the development of high density mixed housing estates, and is set to do so in the future. A solution to this problem is to formally bring into this new BLP the *Windsor Legacy Bridge* development project (which to for last 10 years has been a private residents' driven scheme), based at Sutherland Grange. It would

provide access to a wide range of open space areas and facilities, including access to the Thames Path National Path, National Cycle Route 4 & 16, access to Dorney Lake, the Jubilee River environment and Dorney Common.

15. Infrastructure

15.1 Community Facilities: - "Improving health, social and cultural wellbeing for all is an important element of national policy",

[1] Given the proposed (Plan) developments for housing, and especially in West Windsor, possibly some 1000+ new homes, where is the Plan for providing commensurate facilities, such as GP/health centre[s], school/education facilities?

15.2 Sustainable Transport:

[1] The preferred policy approach is to work in partnership with..... Whose responsibility is it for planning this aspect? – This needs to be more proactively driven!

15.3 Developer Contributions:

[1] Where is the plan[s] for school/learning centres and health services to go with the proposed plan/options for housing? — We've basically ascertained there is none, "until the houses are built!" (Quote; Miles Thompson Planning Policies Manager RBWM). We have perceived therefore that this whole aspect/area, as a major weakness in the new BLP. There seems to be a default option to rely upon a privatisation strategy (private developer contribution). To date, this seems unreliable and at risk, as the Developer will find ways and means to avoid obligations, (Please refer to the current redevelopment case at *The Parade in West Windsor, plus also the current HMG enquiries into recent Crown Estate Affordable housing projects in the South West*).

Therefore, there needs to be a much more rigorous Planning Approval/Contract obligations mechanism to secure a fair & full deal is delivered, in these matters.

15.4 Telecommunications:

[1] Superfast Berkshire broadband scheme – What plan(s) have RBWM got for promoting & encouraging the use of this scheme, and especially, for an ageing population where many services and life transactions will be conducted electronically?

15.5 Water supply and sewerage:

[1] What plans have RBWM got to obtaining a competitive market in this industry? i.e. When is Thames Water to lose their monopoly on this business in this area? – If we can do it for gas & electricity, why not for water?

Prepared on behalf of and for the WWRA

By Peter & Catherine Brown (WWRA Management Committee Members)

20th. March 2014