

Prepared for 13 organisations listed below (the “Group”):

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 AND 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 AND ENVIRONS

SPORTSABLE

ROYAL BOROUGH OF WINDSOR & MAIDENHEAD BOROUGH LOCAL PLAN

ADVICE

1. The Royal Borough of Windsor & Maidenhead (RBWM) have prepared a Local Plan which has been submitted for examination. This is due to commence on 26th June 2018.
2. The purpose of the examination is for the Inspector to determine whether the Plan is sound; ie whether it is positively prepared, justified, effective and consistent with national policy. For the Plan to be accepted as justified it is explained in the Planning Inspectorate’s Practice Note that

this means the Plan should be the most appropriate strategy when considered against reasonable alternatives¹.

3. Regulation 22 of the Town and Country Planning (Local Planning) Regulations provides that the documents which the authority should send to the Secretary of State for examination should include the sustainability appraisal report. This report should include consideration of reasonable alternatives.
4. RBWM have submitted two Sustainability Appraisals: a Main Report dated June 2017 and an Addendum dated January 2018. In paragraph N2 of the June 2017 version it is stated that sustainability appraisal is “the process of informing and influencing the preparation of the Local Plan to optimise the sustainability performance of the plan”. Paragraph N5 states that the sustainability appraisal contains an appraisal of reasonable alternatives during the plan making process, including the likely significant effects of the Local Plan in terms of sustainability.
5. Despite these statements both Sustainability Appraisals are defective as they fail to consider, appraise and consult upon significant alternative strategic options, as explained below:
 - In 2014 RBWM carried out a Preferred Options Consultation. This proposed a number of releases of Green Belt land for housing.
 - In late 2014 the Cabinet decided against releasing Green Belt land (apart from two relatively uncontroversial sites)
 - It was then decided that housing need would be met by building taller and more densely in Maidenhead Town Centre. A capacity study was commissioned to give effect to this approach.

¹ Procedural Practice in the examination of Local Plans, page 48 #3.1

- It was intended that the Capacity Study would help inform a Second Preferred Options Consultation, scheduled for summer 2015.
 - The 2015 Consultation did not take place. There was therefore no consideration or consultation on the option of increasing housing densities in Maidenhead.
6. RBWM's approach was then to focus new housing development to the south of Maidenhead, on the Golf Course and nearby sites, all of which are in the Green Belt. There is however no evidence that alternative options have been considered or tested. There is therefore no evidence which shows that land south of Maidenhead is, or is not, the most sustainable location for major new housing growth. Moreover no appraisal has been undertaken in relation to the Maidenhead Capacity Study which hasn't been used in either Sustainability Appraisal.
 7. One option being considered by nearby authorities is the possibility of a new settlement. RBWM has not however seriously considered or tested this possibility. Despite this, RBWM did receive an approach in 2016 from a major landowner in respect of a potential mixed use scheme, including a significant amount of affordable housing. This was a definite proposal in respect of many hectares of land to the west of Maidenhead. This is not mentioned anywhere by RBWM. It represents an approach which RBWM should have considered. The failure to do so means there has been no appraisal of these options, and, most importantly no public consultation on these alternative approaches.
 8. There are therefore serious flaws in the Sustainability Appraisal undertaken by RBWM. They represent fundamental flaws as described in the PINS Practice Note. The Local Plan as submitted clearly lacks a comprehensive, up-to-date and robust evidence base. In such circumstances the examination process cannot be fully effective. The Inspector should therefore be respectfully

invited to suspend the proceeding so that the Council can carry out the additional work to address the significant shortcomings in the Sustainability Appraisals.

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