



30 January 2018

Rt. Hon. Dominic Raab
Minister of State for Housing & Planning
Ministry of Housing, Communities & Local Government
2 Marsham Street
London
SW1P 4DF

Open Letter to the Minister of State for Housing

Dear Dominic,

Please accept our congratulations on your new role as Minister of State for Housing.

The RBWM Residents Action Group (RRAG) is an association set up in June 2017 by a number of organisations including Parish Councils, Neighbourhood Plan Groups, local residents associations, and individual residents concerned about the impact the proposed Borough Local Development Plan (BLP) will have on our area.

We have serious concerns about the intransigence of our local Council – the Royal Borough of Windsor and Maidenhead (RBWM) – in refusing to listen to the concerns of the local community about the proposed BLP and, specifically, about the provision of affordable housing within the BLP. It must be stated that the attitude shown by the Borough Councillors is in marked contrast to that of one of our constituency MP's, The Rt Hon Theresa May MP, who made time to meet with members of RRAG shortly after the group was established, and noted that the lack of appropriate council interaction with residents during the BLP process was contrary to the best interests of the community and against the spirit of localism.

One of the concerns is the important and contentious issue of affordable housing. Everyone agrees that affordable housing is an absolute necessity but our Council has so far failed to answer residents' legitimate questions and concerns about exactly how this will be delivered. Senior Councillors have made very public assertions that RBWM's proposed BLP will deliver 30% affordable housing. However this is not secured by policy in the BLP, nor is there clarity about exactly what constitutes 'affordable housing' in an area like RBWM. We have repeatedly tried to engage with our Council on this topic and our specific questions are enclosed in an appendix to this letter. We need your assistance to get substantive answers to our questions from our Borough Council and not the 'soundbites' they seem to prefer. So far all our requests to the Council on this topic have been ignored.

The Affordable Housing policy in the BLP requires 30% of dwellings on sites of over 10 net dwellings or over 1000 sq m floor area - but this is subject to “constraints on the development of the site imposed by other planning objectives” as per the NPPF. In areas with high land values, or where mitigation costs are high, developers can argue that the required % of affordable housing will render a development unviable. This means a far lower percentage of affordable housing will actually be delivered. Further, the only reference in the Plan to the definition of affordable housing is that “Tenure, size and type will be negotiated on a site by site basis”. We would argue that a much clearer statement of the desired tenures is essential – eg. ‘Social Rented’, which is our biggest need to be blunt - dwellings priced at 80% of market value in an area like ours, cannot realistically be described as ‘affordable’.

RRAG’s opposition to the RBWM’s proposed BLP is based on careful analysis of the proposed policies. Our 28pp executive summary submission (copy enclosed) to the Reg 19 consultation gives an overview of our case for opposing the BLP as it currently stands. We have also submitted a substantial file of supporting evidence. We believe the BLP as it stands is seriously flawed and should be declared unsound. We have made every effort to engage positively with our Borough to persuade them to give due consideration to the aims and aspirations of Neighbourhood Plans and local residents. For the record we are strongly **PRO** development and support the need for a BLP. We need more housing - and more affordable housing - and crucially we need a proper Infrastructure Plan to make development truly sustainable. We want a Plan that has a positive vision for the Borough – one that is shared by the community. So far the Council has been reluctant to listen to local communities. This has resulted in a complete breakdown in trust between residents and RBWM - and the relationship continues to deteriorate. Communication between the Borough and residents groups such as RRAG is increasingly conducted via formal or legal processes, for example to obtain information we are compelled to use FOI requests. We never attend meetings without there being at least two people present to act as witnesses. This is not the relationship we want to have with the Councillors and Officers of our Borough.

We will set out our evidence for opposing the BLP in front of an examining inspector with the aim of having this BLP found unsound - and if necessary we will raise the funds for legal representation **against** our own Council. Projected timings are that the earliest a public hearing is likely to be held is around May 2018. If the BLP is found to be unsound – what happens next? Crucial time and money will have been lost and the delivery of a sound Plan will be further delayed. Unfortunately it seems there is no mechanism or procedure that would allow us to make a case for an intervention by DCLG prior to the Plan being submitted to an Inspector.

We would welcome your intervention, advice and support to enable us to get answers to our questions on affordable housing and broader concerns with the BLP– and to find a way to rebuild the relationship with our Councillors so that we can work together more effectively for the benefit of our communities. Things must not be allowed to continue as they are.

We look forward to hearing from you.

Yours Sincerely,

RRAG Steering Committee (Jane Dawson, Ken Elvin, Patrick Griffin, Martin Hall, Naheed Majeed, Margaret Morgan and Diana Tombs)