



**Royal Borough of Windsor & Maidenhead  
Borough Local Plan (2013 – 2033)**

**Representation Form**

**Please use a separate sheet for each  
representation**

Ref:

(For official  
use only)

**Name of the Local Plan to which this  
representation relates:**

**Borough Local Plan (2013–2033)  
Submission Version Incorporating  
Proposed Changes, October 2019**

Completed forms must be received at our offices by **midnight Sunday 15 December 2019**

We encourage you to respond online using the consultation portal:

<http://consult.rbwm.gov.uk/portal>

Alternatively, you may scan and email forms to: [blp@rbwm.gov.uk](mailto:blp@rbwm.gov.uk) or send them by post to: FREEPOST RBWM PLANNING POLICY

Please note that representations must be attributable to named individuals or organisations. They will be available for public inspection and cannot be treated as confidential. Please also note that all comments received will be available for the public to view and cannot be treated as confidential. Data will be processed and held in accordance with the Data Protection Act 2018 and the General Data Protection Regulations 2018.

	1. Personal Details	2. Agent Details (if applicable)
<b>Title</b>	Mrs	Cllr
<b>First Name</b>	Jill	Bill
<b>Last Name</b>	Gavin	Perry
<b>Job title (where relevant)</b>	Clerk to Cookham Parish Council	Cookham Parish Councillor
<b>Organisation (where relevant)</b>	Cookham Parish Council	Cookham Parish Council
<b>Address Line 1</b>	Council Offices	Council Offices
<b>Address Line 2</b>	High Road	High Road

Address Line 3	Cookham	Cookham
Address Line 4	Maidenhead	Maidenhead
Postcode	SL6 9JF	SL6 9JF
Telephone number	01628 522003	01628 522003
Email address (where relevant)	office@cookhamparishcouncil.org.uk	office@cookhamparishcouncil.org.uk

**PART B – YOUR REPRESENTATION**  
(Please use a separate sheet for each representation)

Name or Organisation	Cookham Parish Council
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3.	To which part of the Proposed Changes to the Borough Local Plan Submission Version does this representation relate?				
Paragraph	Full	Policy	All	Policies Map	

4.	Do you consider the Proposed Changes to the Borough Local Plan Submission Version would make it: (please tick as appropriate)				
4.1	Legally Compliant	Yes		No	✓
4.2	Sound	Yes		No	✓

5. Please give details of why you consider the Proposed Changes to the Borough Local Plan Submission Version are not legally compliant or are unsound. Please be as precise as possible.  
If you wish to support the legal compliance or soundness of the Proposed Changes to the Borough Local Plan Submission Version, please also use this box to set out your comments.  
(Continue on separate sheet/expand box if necessary)

See following sheet attached.

6.	<p>Please set out what modification(s) you consider necessary to the Proposed Changes to make the Borough Local Plan Submission Version Incorporating Proposed Changes legally compliant or sound, having regard to the Matter you have identified at Section 5 (above) where this relates to legal compliance or soundness.</p> <p>You will need to say why this modification will make the Borough Local Plan Submission Version Incorporating Proposed Changes legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p> <p>(Continue on separate sheet/expand box if necessary)</p>
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See following sheet attached.

***Please note*** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at later stages.

***After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues she identifies for examination.***

**7. If your representation is seeking a modification, do you consider it necessary to participate at the examination hearings stage when it resumes?**

**No**, I do not wish to participate at the examination hearings

**Yes**, I wish to participate at the examination hearings

**8. If you wish to participate at the examination hearings stage once it resumes, please outline why you consider this to be necessary:**

Cookham Parish has 4400 electors and a total population of about 6000 Cookham Parish Council ("CPC") represents those electors and residents.

While Cookham also has Borough Councillors, they represent Bisham as well as Cookham. They also have their wider responsibilities on behalf of the Royal Borough. CPC speaks uniquely for Cookham, with the legitimacy of an elected local authority. As a Parish Council, its elected members are also uniquely close to their electorate and area.

Many aspects of the proposed BLP and the proposed changes to it impact substantially and adversely on Cookham. These aspects are not only those within Cookham itself, such as proposals to erode its Green Belt to a greater extent than any other local area within the Royal Borough and in CPC's view contrary to national planning criteria and those of the BLP including its proposed changes, but also developments outside Cookham (both inside and outside the Royal Borough) which will impact negatively on it, through factors like infrastructure (or the lack of it), traffic, noise and pollution.

The country and indeed the world know Cookham as the subject and backdrop to internationally recognised art, through the renowned artist Sir Stanley Spencer. Almost half the length of Cookham's borders is within the special 'Setting of the Thames' planning area. Cookham Parish has two Conservation Areas within it.

With the exception of the historic part of Windsor, no other part of the Royal Borough can equal that. It is that special historic legacy which CPC strives to protect for its residents and for others, including future generations, and which is threatened by the BLP and the proposals to change it.

Because of the constraints of the system for commenting on the proposed BLP, Cookham believes that oral representations are the best way to ensure that its special problems, special position and needs are properly appreciated and taken into account. For the reasons given, its representative(s) are uniquely well placed to make those representations.

***Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the examination hearings stage once it resumes.***

<b>Signature</b>	 <b>Jill Gavin – Clerk to Cookham Parish Council</b>	<b>Date</b>	<b>10/12/2019</b>
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# **Cookham Parish Council's Response to The Draft Local Borough Plan 2013 – 2033 Submission Version incorporating proposed changes October 2019**

**As Agreed at the Council Meeting on 3<sup>rd</sup> December 2019.**

## **General**

**Cookham Parish Council ("CPC")** understands that its responses should relate to the Draft Local Borough Plan 2013 – 2033 Submission Version incorporating proposed changes October 2019 ("the new Plan"), that is to say such parts of it as have changed in/as a result of the proposed changes.

This document is based on CPC's previous response to Regulation 18 consultation. That response was also submitted as part of CPC's response to the previous Regulation 19 consultation under cover of an email dated 23 August 2017 from its then Clerk, Mr Mark Hollands, under CPC's representor name and organisation reference 336564 (see RBWM Borough Local Plan, Submission Documents, Core documents CD\_012 V2 Representations by Representor (Alphabetical) Order (Jan 2018) V2.pdf 09/03/2018 p 1367).

CPC has updated that document to deal with the new elements/changes in the new Plan. CPC submits this accordingly as its response to the current Regulation 19 consultation. It stands by and re-affirms its other previous Regulation 19 submissions recorded in the above-mentioned Representations insofar as they remain appropriate.

## **Soundness and Lawfulness**

CPC regrets that the methodology behind many of the figures and projections underlying the Draft Local Borough Plan 2013 – 2033 Submission Version incorporating proposed changes October 2019 ("the new Plan") is/remains largely or completely obscure. It does not consider that it is possible to have meaningful consultation about the new Plan if those purportedly being consulted are not told, so cannot understand and hence cannot comment upon and/or criticise, the methodological basis for the new Plan.

In particular, it is not clear to CPC that a proper filtering by positive and negative factors relative to the criteria in the new Plan has been applied to the selection of the allocated sites set out in the new Plan for development. Accordingly it cannot accept that the sites in or relevant to Cookham so allocated (now AL 36, 37 and 38 in Cookham and AL 25 highly relevant to Cookham) have been selected as the least damaging in the Royal Borough in accordance with the criteria the new Plan itself sets out. On the contrary it sees that the amount of development in the Green Belt around Cookham is substantially higher, pro rata, than anywhere else in the Royal Borough (see below), which seems to be prima facie indication that an excessive amount of development may be directed to Cookham.

If the facts and figures underlying the new Plan and the changes in it are not correct, the new Plan cannot stand. Proper consultation must therefore involve fully divulging and explaining the facts, figures and methodology used to prepare the (changes in the) decisions in the new Plan, so that they can be understood and challenged if necessary. Since this has not been done, CPC

considers that the new Plan is not sound and is not lawful because no proper consultation is taking or can take place in the absence of that data.

## **Scope**

In this response, CPC will apart from the above restrict itself to items specific to Cookham and aspects and policies which relate to Cookham.

Generally, as stated in opening, CPC stands by and re-affirms its comments made in respect of the previous draft of the BLP where either the new Plan makes no changes or this document does not comment on the new Plan.

## **Designation of Poundfield as a Local Green Space**

The Parish Council endorses the designation of Poundfield as shown on the Policies Map as a Local Green Space. Many Residents supported this designation by way of petition and the subsequent resolution of the Borough Councillors on 23<sup>rd</sup> February 2016. Accordingly, CPC welcomes and strongly supports paragraphs 14.8.4 et seq., especially 14.8.6, .7 and .8, and Policy IF 3, both as to IF3.1 and 3.2.

However, it feels that IF3.2(a) should be removed. At the least it should be made more restrictive by inserting 'small' before 'new buildings'. Erecting any significant new buildings is self-contradictory in terms of open green space and green infrastructure and could be the thin end of a wedge even if originally designated for sporting facilities.

The CPC notes, however, that part of Poundfield has been classified as potentially developable (under the new and distracting designation of the 'Philo Field') in the HELAA 2019 (site 0320). In the circumstances it should be removed, not least because development would be contrary to Policy IF3.

## **Green Belt Policy**

The Parish Council wishes to make the following statement and requests the relevant changes to the draft Green Belt policy. The existence of the Green Belt is vital to rural villages such as Cookham. CPC opposes any weakening of the protections of the Green Belt and its specific comments in this document should be read within that general representation which applies to the whole of the new, as to the former, Plan.

## **Development in the Green Belt/Open Spaces**

CPC notes the renumbering of SP1 in the new Plan. It therefore takes the opportunity of re-stating that it strongly supports that facts that (a) the Metropolitan Green Belt is defined on the Policies Map and the open and rural character of the Green Belt will generally be maintained and supported to safeguard the Borough from inappropriate development; and (b) the boundaries of existing settlements washed over by the Green Belt, (as defined on the Policies Map) will be maintained in order to identify limits to any infilling and that the Council will determine whether any local exceptional circumstances exist to warrant any changes to those boundaries.

In particular, CPC supports policy SP1.8 and 1.9. The maintenance of the Green Belt is vital to the preservation of the Cookhams (Cookham Dean, Cookham Rise and Cookham Village) as villages separate from each other as well as separate from Maidenhead. It is at, inter alia, preventing precisely this potential mischief (development joining previously separate villages) that the Green Belt is aimed. CPC: (i) supports all policies in the new Plan with that aim, and (ii) urges the strengthening of those policies.

CPC therefore welcomes the revised SP1 generally, with particular reference to its emphasis on development being confined to the areas there set out specifically for it. What is in the new Plan policy SP1.9 is vital to Cookham.

CPC also welcomes and fully supports the new section 5.4 in the new Plan. Much of Cookham lies in the flood plain and paragraph 5.4.3 is particularly welcome. The same is true of the first new bullet in 6.2.6 (Quality of Place). CPC strongly urges as part of this approach to climate change and climate change adaptation that it be spelt out in terms that all new developments must be properly equipped with renewable energy sources (including solar tiles or panels), electric vehicle charging points, and comprise buildings of carbon-neutral/passive construction, as well as open spaces not just for recreation but for bio-diversity and flood alleviation. The new QP3.1 (a) is strongly supported in this context but should be strengthened.

The importance of these factors is particularly high in Cookham, where ageing infrastructure in a rural area is already strained (and where high property prices make the cost of such things in new developments proportionately less burdensome). CPC urges that specific reference be made in SP2 to such things in the Green Belt and rural areas, including specifically Cookham.

CPC also specifically welcomes and supports the new QP1.2 (f), (g) and (h), as well as QP1.3. All of these are particularly applicable to Cookham and any new development there.

Similarly, CPC welcomes and strongly supports new paragraphs 6.10.1, .2 and .3. Cookham is an exemplar of an area with important green infrastructure which requires preservation, and against the background of section 5.4, enhancement. CPC strongly supports new policy QP2, with particular reference to QP2.1 and .3.

Having said that, CPC feels that there is inadequate mention and appreciation in the new Policy QP2 of smaller open spaces and greenery. The definition of green infrastructure, for example, is on a strategic scale rather than an everyday one. Small green open spaces, whether or not officially parks, play areas or similar, or part of such a network, are a vital part of people's experience of open space and greenery. CPC urges that for that reason the words a new Policy QP2.4 be added to the new QP2 to the effect that: "Development should not eliminate or significantly reduce open green space within existing, particularly rural, settlements" or words with similar intent and effect.

New Plan paragraph 6.14.4 begins: "Appropriate tall building development will only be in town centres ...". CPC supports that proposition. Similarly, CPC agrees new Policy QP3a.1 that: "Within established settlements new development will be expected to maintain contextual heights to re-inforce and reflect the character of an area".

However, new QP3a then goes on to define a 'tall building' as one "more than 1.5 times contextual height or a minimum of two stories (whichever is the greater) ..." (QP3a.4). QP3a.2

says of greenfield sites that: “Proposed context heights for such sites should not normally constitute an increase to the surrounding context height by more than one storey.”

This is actually by implication a relaxed standard which would permit the development in Cookham of 3 storey or 4 storey buildings, both generally and specifically on the allocated sites. Such buildings would be quite inappropriate in a Green Belt, rural or rural community/village context, especially on sites such as AL37 and AL38 on the outskirts of (indeed entry to) such communities.

CPC therefore strongly urges that QP3a have an additional Policy as QP3a.8 which says: No tall buildings, or buildings above immediate contextual height, will be permitted outside Maidenhead, Windsor and/or Ascot except in exceptional circumstances.” or words with similar intent/meaning.

CPC endorses the re-numbered QP4, but since it is merely renumbered from the previous version simply says so.

CPC regrets the removal of paragraphs 6.8.24 – 27. As stated above, it views the Green Belt as fundamental to Cookham, for the reasons given above. Any weakening of the protection given to the Green Belt is to be deprecated and resisted. These paragraphs should be re-instated.

In particular, however, CPC strongly opposes the changes to QP5 in the new Plan. It may be simplest if CPC sets out by reference to QP5 paragraph numbers the changes it would like, since then the context and its reasoning will be clear:

QP5.2: substitute ‘only where they are entirely’ for ‘where they are’. The proposal in the new Plan in effect relaxes substantially the protection for the Green Belt. For the reasons given, this is crucial to Cookham, where creeping intrusions of one kind or another into the Green Belt are being encountered all the time and resisted only with difficulty. CPC adamantly opposes any weakening of the protection given to the Green Belt in national policy.

QP5.3. Delete and replace with: ‘Infilling is not acceptable on Green Belt land save in exceptional circumstances. In any such exceptional cases, infilling will only be permitted if it is plainly within an existing urban settlement, at a density and height which is not greater than the lowest of the adjoining plots and which creates or preserves adequate open space and blue and green infrastructure and respects, preserves and wherever possible enhances biodiversity.’ As stated, Cookham is the subject of perennial applications for development by way of alleged ‘minor additions’ of one kind or another to settlements. On many occasions these actually expand the settlement area – see AL37 below. If the green spaces between the Cookhams and between Cookham and Maidenhead are to be preserved, there must be a firm prohibition on such spreading and development in the Green Belt.

QP5.4. Insert: ‘will be permitted only if demand can be unequivocally demonstrated, suitable traffic and parking facilities exist or will be created and’ before ‘should be unobtrusively...’. New equestrian facilities cause extra traffic and parking, as well as creating buildings and often obtrusive fencing. They are a cause of problems with re-use of buildings (see QP8 and 9 below). They are again a derogation from the Green Belt which should be resisted.

QP5.8 and 5.9. Delete all after 'will be acceptable' in QP5.8, including the whole of existing QP5.9, and substitute: 'only in exceptional circumstances'. Agricultural uses are part of green infrastructure and any derogation from agricultural use puts agricultural and green belt land at greater risk. Once an agricultural building is reused, another will be built/required, and then is at risk of re-use and so on. Besides increasing traffic and placing yet further demands on unprepared infrastructure in rural areas ill-equipped to bear either, this can permanently change landscapes, contrary to the new Plan's policies on green infrastructure and quality of place. The policy as it stands is inconsistent and illogical. This is a perennial issue in Cookham, where frequent applications are made to convert agricultural buildings so CPC has much experience of this issue. See AL37 below.

Further or alternatively, CPC urges a new policy to deal with the perennial problem of new agricultural buildings, which (as stated) are often later converted for other, non-agricultural, purposes with resultant degradation of the Green Belt.

CPC strongly supports the inclusion of a new policy QP5.10 as follows:

#### **"New Agricultural Buildings**

"A robust business case will be required for the approval of any new agricultural building in the Green Belt. Any permanent or temporary agricultural building or mobile shelter for the use of livestock or poultry must be sited sufficiently far from existing dwellings to ensure that noise, smell and pest nuisance are avoided. Permitted development rights will normally be removed from new agricultural buildings and conditions attached to permissions to ensure removal of the building if the permitted use is terminated. In all cases the history of the present and previous enterprises will be scrutinised and where fragmentation has occurred to sever land from otherwise suitable buildings, or change of use of otherwise suitable buildings has occurred, the new building will not be permitted. Unless overriding operational reasons can be demonstrated any new agricultural buildings should be sited adjacent to existing ranges of buildings and in such a way as to reduce their adverse impact on the openness of the Green Belt to a minimum."

#### **Traffic**

CPC notes that the new Plan contains no reference to consultation with Wycombe District Council relating to development and new highways proposals north of the Thames. (Note supra re general lack of consultation.) Recent proposals in both respects, especially the proposed new link road on the Hollands Farm development bypassing Bourne End, emphasise that substantial extra traffic is likely across Cookham Bridge and hence through Cookham as a result of such proposals.

Cookham Bridge is listed. The relevant road, the A4094, leads from the Bridge into the Cookham Conservation Area. Conservation, traffic infrastructure, noise, safety, pollution and biodiversity requirements as set out in the new Plan all combine to show that the new Plan should contain specific measures aimed at protecting Cookham from such planned or possible changes outside the Borough which will impinge significantly on delicate areas such as the listed bridge and Cookham Conservation Area.

The same is true in respect of the very substantial development planned and/or already underway in Maidenhead. This is likely to produce significant traffic flows to and through Cookham.

Further, should the allocated sites in Cookham be approved despite CPC's objections, these will create significant intra-Cookham and to/from Cookham traffic. Bottlenecks in Cookham include The Pound, Cookham High Street, Cookham Bridge and the Cannondown railway bridge on Maidenhead Road, all of which already have de jure (or in the case of Cookham High Street de facto) one way priority or traffic light schemes. The extra traffic flows from the allocated sites would significantly worsen these problems, which should be addressed before any development is permitted on such a scale.

CPC calls for such specific policies to be inserted in the new Plan.

### **Open spaces/biodiversity**

CPC welcomes the strengthening of protection open spaces and biodiversity in the new Plan. However, as a rural area, it considers that these do not yet go far enough. It is cognizant, for example, of the need for a wildlife corridor from the banks of the Thames to the east of the Parish up to the hills in the west, from Widbrook Common up to and past Mount Farm. More intensive farming, and a fortiori development whether for housing or office/light industrial purposes threaten even the existing open space.

While this submission deals with most of these points under 'Green Belt' the policies there advocated mesh with and support the new Plan's enhanced emphasis on green and blue infrastructure. CPC strongly urges the further strengthening of these policies, in particular in QP2 and QP4.

CPC also notes that for reasons it will give when considering allocated development sites below, the new Plan's approach in particular to sites AL37 and AL38 does not properly reflect its own policies.

### **Housing**

The Borough's housing target is 'at least 14,240 new dwellings' for the plan period March 2013 to March 2033. Actual and estimated completions from March 2013 to March 2020 are 3,286, which means that by next March, only 6 years into the period, RBWM will already have delivered 23% of its requirements. If current commitments - 3,193 dwellings with planning permission- are added, approx. 45% of its requirements will have been met, long before the plan period is half way through.

RBWM are now projecting a yield of 16,435 dwellings, i.e. a surplus against requirement of 2,195. The allocations in the table should read 7,671 and the total should read: 16,215. On the face of it, therefore, there seems little reason for land in Cookham's Green Belt to be taken to meet a need which does not appear to exist.

The three identified sites in Cookham are: (1) AL36, the Cookham Gas-holder site (50 units), (2) AL37 Land at Lower Mount Farm (200) and (3) AL38 land east of Strande Park (20). The effect of including sites (2) and (3) would be to increase Cookham's housing stock by approx. 10%.

CPC's first objection, as stated above, is the disproportionate expansion of housing stock in Cookham entailed by these developments. Against the background of the new Plan specifically stating that the major new developments in the Royal Borough should be only in the three designated sites of Maidenhead, Windsor and Ascot, it is contrary to all the themes, principles and policies of the overall new Plan to load proportionately so much onto a community in the Green belt.

It would worsen the existing strain on Cookham's existing infrastructure in terms of schools, roads, sewerage, public transport and communications. This is particularly so in that all the sites are within a relatively small area in Cookham Rise.

Against that background, CPC turns to the sites designated as potentially suitable for housing development in Cookham in the new Plan under proposed policy HO1: Housing Development Sites, namely AL 36, AL 37 and AL 38.

CPC submits first, however, in respect of new Policy HO1 that in HO1.3 the words 'expected to help guide' should be deleted and the words 'implemented as conditions for planning permission in'. Unless the wording is strengthened in this way, the Site Specific Requirements ("SSRs") in all the allocated sites are not binding but mere guidelines which developers will seek to subvert, water down or otherwise avoid and which will not constrain the planning authority because they are exactly that – only guidelines. It is in CPC's view most important that the SSRs be mandatory.

This is particularly important to Cookham. Two of the allocated sites in the Plan are currently Green Belt land to the withdrawal of which status CPC objects strongly. This the SSRs for those sites contain items which are plainly intended to attempt to assuage so far as is possible these objections. This for example in respect of AL37 (land at Lower Mount Farm) the second SSR is: 'Provide a strong green infrastructure network across the site that is strongly connected to the surrounding area ...'. The third is: 'Have appropriate edge treatment and transition to the countryside ...'. And so on.

Unless the SSRs are made mandatory, these supposed protections are of little value. They are in effect mere pious hopes. It is therefore of the first importance that HO1.3 be strengthened as requested.

CPC strongly urges that sites AL37 and AL38 should be deleted on the grounds that these sites are not needed to enable the Royal Borough to fulfil its housing requirement and for the other reasons set out here. Accordingly and further, no very special circumstances exist which would justify, under either NPPF/national policies or the rest of those in the new Plan, these pieces of land being removed from the Green Belt.

CPC accepts the need for some new housing within the Parish, although it has been unable to quantify that need (and it refers to its general objection as to the absence of methodologies in this respect). No specific evidence of housing need in Cookham has been presented in the new Plan or Supporting Documents. However, CPC accepts in principle that it may be appropriate to permit development on the brownfield site known as the 'Old Gasholder site', AL 36, subject to the considerations set out below.

The Cookham Village Design Statement (“VDS”) was adopted as supplementary planning guidance in 2013. It was created following extensive local consultation, and subject to detailed scrutiny over an extended period by Borough officers, before it was adopted. It sets out key local guidance for design (relevant for section 6.2.5 of the draft Borough local plan), protection and enhancement of green spaces (relevant for section 14.4.5 of the draft Borough local plan), and other important local issues.

CPC expects that the VDS will continue to be used as a supplementary planning document unchanged, without any direct conflict with the new Plan. It is essential that CPC is advised of any policies in this which might contradict or overrule any VDS guidance in the determination of any planning application or the pursuit of any planning enforcement.

CPC attaches high importance to its Green Belt land. The conclusion of the VDS was that “Cookham is defined by its green spaces” (VDS section 4) and the Parish Council has acted to protect its Green Belt from development which impinges on openness wherever possible. In particular, as noted in the VDS (VDS section G4.4) and above, CPC is concerned to preserve the attractive appearance of the Green Belt and to ensure that the green gap between Maidenhead and Cookham is not compromised.

CPC holds Planning Committee and full Council meetings every month. As part of this, and of the case work undertaken by individual Councillors, CPC frequently engages with its residents on issues affecting the Green Belt. It is clear to CPC that in so valuing the Green Belt it is properly representing the views of its residents, who value the Green Belt highly and do not wish to see it developed.

CPC is also concerned to ensure that infrastructure is available in advance to support any new housing. This has regularly been raised as a major concern by it and its residents. Infrastructure capacity and suitable upgrading for Cookham to cope with new housing must be considered thoroughly and installed before any development is permitted or serious existing problems will be exacerbated.

CPC remarks that infrastructure is not a problem within sites alone. Sites connect to existing infrastructure off-site. It is trite therefore that problems may thus be caused off-site by new developments. It is in turn thus critical that off-site infrastructure must be address before sites are allocated, or given permission, for development.

In Cookham such problems include extra vehicular traffic in a Parish where the road structure was not designed, and hence is not easy, for modern vehicles. They include infrequent train services, limited station parking, stretched if not already inadequate sewerage systems and similar issues.

CPC therefore welcomes the changes to Policy IF7 at paragraphs 3 and 4. These changes in the new Plan appear to be directed at these concerns. However, CPC urges strengthening these changes by:

1. In IF7.3:
  - (a) deleting ‘are encouraged to’ and substituting ‘must’ – it is plainly critical that there should be consultation to ensure that existing infrastructure is not overloaded by new development before it is built or granted permission;

- (b) Adding 'and/or appropriate' after 'necessary' and before 'infrastructure upgrades' – if upgrades are limited to the strictly 'necessary' then (i) there is scope for serious issues about what is necessary, and all such disputes should be resolved on the cautious side, and (ii) upgrades should take account of climate change and biodiversity and may well therefore need to be better than what is 'necessary' for the development as such at the time when it is delivered;
- (c) Deleting '/in line with the occupation of' – to allow upgrades to off-site to be completed only 'in line with occupation' is vague and opens the doors to misalignment of delivery. The only way of ensuring proper delivery is to require it before the development starts; and

2. In IF7.4:

- (a) Deleting 'Where appropriate,' – in the circumstances set out it will always be appropriate;
- (b) Delete ', which result in the need for off-site upgrades,' – this phrase is unnecessary and confusing in the light of the end of the sentence;
- (c) Delete 'occupation' and substitute 'construction' – for the reasons given re IF7.3 at 1(c) above;
- (d) Insert 'and/or appropriate' after 'necessary' – for the reasons given re IF7.3 at 1 (b) above.

CPC urges that the same policy requirements be imposed in respect of broadband and telecommunications, of electric charging points for vehicles and of solar and other renewal power sources adequate for and as appropriate in any new developments, which would be in accordance with the new Plan's emphasis on climate change and biodiversity.

CPC strongly urges that the sites be ordered for development consecutively, rather than being left to be developed at the whim of the proposed developer. In accordance with the new QP Policies in the new Plan, it seems clear that brownfield sites should in principle be developed before green field, and especially Green Belt, sites. For that reason a hierarchy of development is appropriate in all rural communities, including Cookham.

**Accordingly in respect of the three allocated sites in Cookham:**

Hence in Cookham's case if, contrary to the CPC's representations, any of the allocated sites in Cookham are developed, AL36 should be first, AL38 second and AL37 only after those two.

**Specifically:**

**As regards the Cookham Gasholder site AL36 :**

CPC requests that any development proposals must:

- a. fully resolve the constraints on sewerage capacity in the vicinity declared by Thames Water in advance of any development; and
- b. provide buildings of a height, bulk and density, open green spaces, highway access and parking provision which are appropriate to and compatible with the surrounding existing developments in accordance with the new Plan.

## As regards the Lower Mount Farm (AL37) and Strande Park (AL38) sites :

### Lower Mount Farm AL37

This site abuts the main road between Cookham and central Maidenhead and it is seen by the many people that travel this road each day. The site rises to the west towards the elevated area of Cookham Dean (Designated in the present Local Plan as an Area of Special landscape Importance). Because of the rising ground, buildings on this site cannot fail to have a disproportionate effect on the overall openness of the Green Belt. We do not believe that damage to the Green Belt can be satisfactorily mitigated by the layout or design of houses on the site. The Lower Mount farmyard to the south is a long established range of farm buildings that formed an isolated separate grouping in open countryside. Building on this site would obliterate the important gap between the farm buildings and the existing housing. When viewed on the ground, (particularly from the B4447) rather than looking at a map, the importance of this site to the Green Belt becomes much more apparent

This site makes a very important contribution to the Green Belt between Cookham and Maidenhead. When assessed against the five purposes of the Green Belt defined in the NPPF para. 134 it can be seen to make a strong contribution to the first three purposes by:-

- a) Restricting the sprawl of a built up area
- b) Forming part of a critical open gap preventing Cookham and Maidenhead merging and
- c) Assisting in safeguarding the countryside from encroachment.

According to the HELAA 2019 methodology (para. 2.23) a strong contribution to any single one of the five purposes of the Green Belt should ensure that the site is classified as “Not developable in the next 15 years”. With a strong contribution to a total of three out of five possible purposes of the Green Belt we believe that the site has been mis-assessed and should be withdrawn from the allocated sites on the basis of the defined method for selecting sites detailed in HELAA 2019.

Additionally, by withdrawing this site from the list of allocated sites in the BLP it would effectively direct any developer wishing to build a reasonable number of houses in Cookham to the Gas Holder site. The Gas Holder site is contaminated brown field land close to an important water abstraction site. Encouraging remediation of a brown field site would meet the fifth purpose of the Green Belt. Whether this could also be classified as a strong contribution we leave the professionals to judge.

The NPPF at paragraph 136 states that *“Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified ....”* Exceptional circumstance have not been fully evidenced and justified here. In fact, as stated above, the Borough’s own figures on allocated sites clearly show that this site can be removed, and the required number of dwellings would still be comfortably met. The figures show that there would still be a comfortable buffer of 13.8% above the established housing need.

In the light of the new information presented in this consultation we believe that the allocation of this site is neither legally compliant nor sound.

Further, CPC objects to this site being allocated for development because:

- a. The site represents a classically undesirable example of sprawl, of precisely the wrong type. To the south, agricultural buildings are gradually being converted, in effect, to retail, light industrial and/or office use in what is now a designated employment zone (to the dismay of CPC). This site is then presented as fit for housing. In fact, despite these undesirable changes on the site to the south the siting of those buildings and their density is still sufficiently wide and their relative mass sufficiently light, that development on this site would plainly be simply sprawl: a substantial new development in the Green Belt substantially contributing to closure of the green gap between Cookham and Maidenhead, contrary to numerous policies in the new Plan and to the NPPF.
- b. Further, the industrial activities on the adjoining site themselves make residential development on this site undesirable.
- c. The extra traffic generated, to say nothing of parking problems, with limited access to one main road would be a serious traffic and safety issue. To the extent that residents needed/wanted to use trains, this would exacerbate parking problems at Cookham Station.
- d. The site is contrary to/does not meet new Policy IF4.2. in any respect.

If included despite the above, there should be SSRs requiring:

- (i) electric vehicle charging points for all homes as per new Policy SP2 and QP3.1(a);
- (ii) adequate car parking for 'family housing' (which is the specified form of housing) bearing in mind that this is a rural area with no school, medical facilities or shops in walking distance and effectively no buses and/or the provision of all such facilities on the site;
- (iii) parking bays for any buses that may be attracted onto the site due to the SSR relating to public transport;
- (iv) restriction of the application of the normal 'high buildings' policy such that no building may be higher than two storeys, in view of its location in Cookham, the height of buildings in the nearest residential roads and the adjoining Green Belt;
- (v) compliance in all respects with the VDS;
- (vi) roadways of adequate width for cars and lorries to pass safely and delivery and other vans to park while still permitting passage with safe pedestrian sight lines in all cases;
- (vii) adequate cycle storage and package reception facilities for all dwellings;
- (viii) solar or similar renewable power supplies as per SP2/QP3.1(a);

(ix) The site SSRs should specify LAP(s) or LEAP(s) in accordance with IF4.4, with requirements which at least meet Appendix F requirements;

(x) The SSRs already recognise the problem of noise pollution. This should be expanded to require measures to suppress light and smell pollution and to ensure that the housing on this site in a rural area not only does not create a problem but helps alleviate the problems from all these things already emanating from the designated employment zone immediately to the south.

(xi) No development to be permitted until traffic issues at the bottlenecks in Cookham have been successfully resolved.

### **Strande Park AL38**

CPC objects to the inclusion of this site for development because:

1. Flood risks on the Strande Lane site cannot adequately be mitigated by any proposed developments;
2. The site is part of existing green infrastructure;
3. The site does not meet the criteria in the new Plan (especially if amended as suggested by CPC) for development;
4. The site does not correspond with the insertion in paragraph 14.10.1 of the new Plan (“Open space is an important feature of the Borough, *forming the element of green and blue infrastructure that primarily delivers amenity value*” (italics are the insertion), in that building on this area would be on and hence destroy what is the current green amenity/open space for the homes immediately to its west;
5. The site does not meet new Policy IF4.2 in any respect.
6. It is impossible to reconcile new Policy HO2.4 with new policy IF4.2 on this site, or with consistency with the adjoining Strande Park.
7. Parking for and access to the site is omitted from the SSRs. This site is at the end of a narrow road, with very limited parking ability and no easy turning area.
8. The site is important to the Common Toad. The Common Toad is a priority species in England under ‘Biodiversity 2020: A strategy for England’s wildlife and ecosystem services’ and s. 41 Natural Environment and Rural Communities Act 2006, where such species were recognised as of principal importance for the conservation of biodiversity. S. 40 of the same Act requires all public bodies to have regard for biodiversity conservation when carrying out their function (‘the biodiversity duty’). Further, disrupting migration routes and breeding ponds are contraventions of planning policies when they occur in new schemes or as a result of renewal works when the issues have been highlighted – see NPPF ss 109, 114, 117 & 118, as well as of the duty of care that public bodies have under SPP 127 and PPW 5.2.3. It is understood that there may also be bat and badger activity close by.

If included despite the above then:

- (a) The site SSRs contain nothing regarding LAP(s) or LEAP(s) contrary to IF4.4 and should do so, with requirements which at least meet Appendix F requirements.

- (b) The first current SSR would, to achieve the density envisaged on this site, eliminate the existing green open space serving Strande Park, thus create a breach of new Policy IF4.4 and should therefore be deleted.
- (c) There should be SSRs requiring:
  - (i) electric vehicle charging points for all homes as per new Policy SP2 and QP3.1(a);
  - (ii) adequate car parking for 'family housing' (which is the specified form of housing) bearing in mind that this is a rural area with no school, medical facilities or shops in walking distance and effectively no buses;
  - (iii) restriction of the application of the normal 'high buildings' policy such that no building may be higher than one storey, in view of its location and the existing dwellings in Strande Park (altering the existing 7<sup>th</sup> SSR accordingly);
  - (iv) compliance in all respects with the VDS, as part of Cookham;
  - (v) additional dwellings should be similar in nature to the existing dwellings on the adjacent Strande Park;
  - (vi) solar or similar renewable power supplies as per SP2/QP3.1(a);
  - (vii) roadways of adequate width for cars and lorries to pass safely and delivery and other vans to park while still permitting passage with safe pedestrian sight lines in all cases;
  - (viii) adequate cycle storage and package reception facilities for all dwellings;
  - (ix) delete the word 'valuable' before 'trees' in the 10<sup>th</sup> SSR;
  - (x) No development to be permitted until traffic issues at the bottlenecks in Cookham have been successfully resolved.

Further, if it were developed, then it should be developed in such a way/ there should be an SSR that at least half the proposed site is left as green open space. This is because:

- a. It is an important part of green infrastructure. Specifically and additionally
- b. There is no other open space/play area for children nearer than the Alfred major recreation ground, about a mile away the other side of the Maidenhead Road . (CPC notes for the Inspector that the centre of Westwood Green, which may look the part on the map, apart from also being the other side of the Maidenhead Road is private land).
- c. The site is important to the Common Toad, as stated above. CPC repeats that the Common Toad is a priority species in England under 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services' and s. 41 Natural Environment and Rural Communities Act 2006, where such species were recognised as of principal importance for the conservation of biodiversity. S. 40 of the same Act requires all public bodies to have regard for biodiversity conservation when carrying out their function ('the

biodiversity duty'). Further, disrupting migration routes and breeding ponds are contraventions of planning policies when they occur in new schemes or as a result of renewal works when the issues have been highlighted – see NPPF sections 109, 114, 117 and 118, as well as of the duty of care that public bodies have under SPP, 127 and PPW 5.2.3.

- d. It is understood that there may also be bat and badger activity close by. These are also species for which protection is required.

**CPC wishes also to comment on the Spencers Farm site AL25:**

Though this site is not technically within Cookham, it encroaches on the open space between Cookham and Maidenhead – see above. CPC therefore objects to development on this site for all the reasons given above.

Further, CPC repeats its original objections when the site was included in the original version of the Plan and requests that this site is not removed from the Green Belt or allocated for development because:

- a. the contribution to the setting, amenity and visual impact of the Green Belt of the Spencers Farm site is greater than has been asserted;
- b. the Green Belt at this point is a vital part of the green infrastructure (as defined in the new Plan) separating Maidenhead from Cookham. Accordingly, removing AL25 (even in its smaller form compared with the former HA21) from the Green Belt is contrary to national Green Belt policies and in particular contrary to the new Plan's policies flood risks at the Spencers Farm site cannot adequately be mitigated by any proposed development.

In the undesirable event that the site remains allocated, then CPC notes and approves of the reduction in the size/area of the site from the old HA21. However, the following should still apply:

- (i) development proposals on the Spencers Farm site must provide buildings of a height, bulk and density, open green spaces, highway access and parking provision which are appropriate to and compatible with the surrounding existing developments on other sites; and
- (ii) development proposals on the Spencers Farm site must include adequate provision, on site or in easy walking distance, to satisfy the occupants'/local education, health and community needs.

Further, CPC strongly supports all the SSRs relating to the provision of a school and green and blue infrastructure, biodiversity, trees and similar matters. The SSRs should additionally contain provisions for LAPs, LEAPs and require significant open space having regard to the submissions above relating to biodiversity and wildlife corridors, having regard to open space, views from Cookham, and the Green Belt generally, particularly on the northern edge of the site towards Cookham.