



SUNNINGDALE PARISH COUNCIL

The Pavilion, Broomhall Lane, Sunningdale, SL5 0QS

☎ 01344 874268

Email: info@sunningdaleparish.org.uk

www.sunningdale-pc.org.uk

Clerk: Ruth Davies

RBWM BLP Consultation – Sunningdale Parish Council comments

To: RBWM Planning Policy

By email to: blp@rbwm.gov.uk

Sunningdale Parish Council has a number of concerns about the RBWM BLP.

Comment 1: RBWM has designated too many policies under the category of ‘Strategic’ which has important planning implications.

We believe that many of the policies defined as “strategic” should not be classified in this way. 28 policies are defined by the Borough as Strategic whereas there are 29 non-strategic ones. National policy guidance states that BLP strategic policies override Neighbourhood Plan (NP) policies should there be any conflict between them so this Strategic classification lessens the importance of the Neighbourhood Plan and conflicts with the Localism approach.

Policy HO5 (Housing Layout and Design) and Policy SP3 (Design) are designated as “strategic” yet much of what is in these policies are details which should not be considered “strategic”.

Comment 2: The Green Belt is of crucial importance but the BLP does not make it clear what areas/sites are being proposed for removal from the Green Belt.

It is very difficult to easily ascertain from the BLP which areas are being proposed to be removed from the Green Belt. The Green Belt is crucially important and of very high interest to local people so any existing Green Belt areas proposed to be removed must be clearly identified. Why does the BLP make this so difficult? The Policies Maps (very difficult to expand) have to be compared with the current Green Belt maps to find out this crucial information. This is unacceptable.

Paragraph 4.2.8 states that the Green Belt will be protected. However, this only applies to areas of the Green Belt that are left after allocated sites proposed for development have been removed from it. This is also unacceptable.

Paragraph 5.8.9 refers to policies HO1 and ED1 which take land out of the Green Belt and allocate it for development whilst paragraph 6.8 attempts to set out the case for doing so. But, exceptional circumstances need to be established for the release of this amount of Green Belt. These exceptional circumstances do not appear to have been identified. Given that such a high percentage of the dwellings proposed will be built on land that is currently in Green Belt the omission of these exceptional circumstances **contravenes planning policy**.

Crucially, we fail to understand how this extensive development within the Green Belt is consistent with Objective 1 in the BLP which seeks to protect the openness of the Green Belt

Comment 3: Housing numbers have been increased without due attention to supportive infrastructure.

The BLP development proposals, in particular for housing, must include assessment of the required infrastructure to support that proposed growth. However, there is no information provided that makes reference to the infrastructure, for example roads, to demonstrate that this predicated level of development can be viable and sustainable. The roads in Sunningdale are already seriously congested, especially at peak times. Concentrating on housing growth without reference to road improvements is a serious omission.

Comment 4: Sunningdale (as well as Ascot and Sunninghill) is being given a disproportionately large share of proposed new housing (Paragraphs 7.2.10-11 and Table 8 Housing supply)

Analysis of the data shows that the historic average for new dwellings just from windfall sites in the Ascot and Sunninghill and Sunningdale area is between 65-70 new dwellings each year.

Table 8 in the BLP shows an allowance from “small sites/windfalls” totalling 1,840 units. It is understood that this to the 17 future years of the plan, giving an annual average of 108 windfalls and small sites.

We believe that the number of windfall sites within Sunningdale made available going forward will not change to achieve this level as Sunningdale comprises of significant number of large plots that are ideal for small scale redevelopment.

Looking separately at Allocated Sites the BLP site Proformas show a total of 991 units under this category as coming from Ascot and Sunninghill and Sunningdale.

Based on the above calculation for dwellings from both windfall sites and allocated sites, this is equivalent to 2,484 new dwellings over the Plan period in Ascot and Sunninghill and Sunningdale which is an increase of approximately 35%.

Given that the current infrastructure is already stretched and parking is extremely difficult we believe that the character of the area will be completely changed and local access to shops and facilities will be significantly worse.

Comment 5: Protection of green corridors

Paragraph 14.2.2 states that “Planning has an important role to play to ensure that, where possible, development proposals contribute to the creation and enhancement of green corridors and networks”. We request that the following is added: “development proposals that threaten green corridors and networks will not be permitted”.

Green corridors are important to the biodiversity and character of Sunningdale. We recommend that a paragraph is included in policy NE1 to specifically provide protection for green corridors.

Comment 6: Overall support for policy on Trees, Woodlands and Hedgerows (Policy NE3)

Sunningdale is an area which is 'green and leafy'. The retention of trees, even if in rear gardens and not sighted from the street scene, play an important role in retaining this character. We request that policy NE3, sub-paragraph 2, is modified to reflect this.

Comment 7: Insufficient evidence that required infrastructure can and will be provided (Paragraphs 15.1.1, 15.2.1, 15.7.3, 15.7.7, 15.7.8, 15.9.3 and Policy IF3; paragraph 15.11 and Policy IF4)

Paragraph 15.1.1 correctly states the importance of suitable and appropriate infrastructure being crucial to the wellbeing of the Borough's resident population. Road infrastructure is especially critical. But, the BLP does not offer or recommend any satisfactory solutions to this problem.

We therefore do not believe this draft BLP fulfils NPPF paragraph 156 which requires strategies and strategic policies to ensure provision of infrastructure alongside homes and jobs.

We fail to understand how the BLP can be noncompliant with the NPPF and still be considered in its present form regarding the required necessary supporting infrastructure.

Comment 8: Flawed transport plan (paragraph 15.7.3, 15.7.7 and policy IF3)

The Local Transport Plan produced in 2012 is used as a supportive document for the BLP. But, many of the allocated sites in the BLP only came forward after this LTP was produced, including Sunningdale Park

The old DERA site, just beyond Sunningdale, outside the Borough's boundaries has outline planning permission for 200 new residential units and a business park for around 2,000 workers. A second area has been designated for development for 1,500 homes. This area has also just been announced as one of the government's new "Green Villages" – Long cross Green Village, which confirms the scale of development we can expect. The main through route from this site to the M3 is currently over a narrow, humpbacked bridge over a road bend on the Chobham Road, leading to a junction of the Chobham Road with the already heavily trafficked A30; this junction being in close proximity to an extremely busy level crossing. The impact on likely traffic congestion is obvious. Development on this site will have a massive effect on Sunningdale and have knock-on implications on neighbouring areas.

BLP Policy IF3 on Transport is **inadequate** and is based on a flawed and out of date Local Transport Plan.

SITE ALLOCATIONS

Comment 9: HA34: Sunningdale Park

We strongly object to the intent to remove Sunningdale Park from the Green Belt. We also object to the scale of development being proposed which directly contradicts Neighbourhood Plan policy.

This site is in Green Belt and no consultation took place either in relation to the Edge of Settlement Green Belt project, nor as part of the Options consultation. It simply appeared in this draft BLP, allocated for 230 units, a density which is unacceptable in the context of the surrounding area.

This site is currently in Green Belt and hence is not included in RBWM's Townscape Assessment classifications. This is why A S and S Neighbourhood Plan policy NP/SS8.4 specifically spells out the requirement for the design of any residential development to have regard to the Key Characteristics and Description of RBWM's Townscape Assessment classifications 'Villas in a Woodland Setting' or 'Leafy

Residential Suburbs', in keeping with the neighbourhood. Allocating this site for 230 residential units will contradict this policy. The density of development proposed will make it impossible to comply with the townscape classifications, thereby totally disregarding NP policy.

In order to properly reflect other elements in NP policy, the built footprint should be set back from the boundaries and substantial green landscaping should be included in keeping with the overall green and leafy character of the area. There should also be a requirement to provide mitigation for any increase in traffic congestion in the area

Comment 10: HA36: Broomhall Car Park

The BLP should make it clear the site is allocated for Car Parking and Small Scale Retail as well as for Residential. This will also make it consistent with proforma HA30 Ascot Station Car Park.

In order to properly reflect NP policy, the provision of a public open space should also be included.

Comment 34: HA37: White House

Single lane access from this site as well as from the two recent housing developments using the same access make this a potentially dangerous junction with the A30 with the proposed number of dwellings recommended for The White House.

For and on behalf of Council

Michael Burn, Co-Chair Planning

Ruth Davies, Clerk to Council