



# SUNNINGDALE PARISH COUNCIL

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Clerk: Ruth Davies

## Regulation 19 Borough Local Plan, Sunningdale Parish Council Representations

To: RBWM Planning Policy

By email to: [blp@rbwm.gov.uk](mailto:blp@rbwm.gov.uk)

Sunningdale Parish Council (SPC) representations on the Borough Local Plan (BLP), Regulation 19 include the following key areas:

### REPRESENTATION 1

**The Parish council objects to a part of Sunningdale Park being removed from the Green Belt (reference Policy HO1 sub paragraph 1, Site reference HA34)**

This is a long thin development, which lies between an Historic Park and Gardens in the Green Belt and Larch Avenue, which is categorised as ‘Villas in a Woodland Setting’ in the RBWM Townscape Assessment.

Sunningdale Park is included in the Ascot and the Sunnings Neighbourhood Plan for appropriate development but that is on the basis of it remaining in the Green Belt. This helps ensure that development is more in keeping with the area and the environment. Removing constraints from this site will encourage over dense development that will be detrimental to the surrounding area and cause more traffic chaos.

SPC maintains that the Council has not made a case for exceptional circumstances for the removal of a significant proportion of Sunningdale Park from the Green Belt.

The Council has not consulted with SPC about the removal of **a part of** Sunningdale Park from the Green Belt. Because much of the site, all of which is in the Green Belt, has previously been developed it could be redeveloped without removing it from the Green Belt.

The SPC recommendation is that all of Sunningdale Park remains within the Green Belt.

### REPRESENTATION 2

**The Parish Council recognises the requirement to deliver the objectively assessed housing need (OAHN). However, we believe that the Submission BLP should place a cap on the housing allocation for each site at or close to the BLP site allocation numbers, or otherwise put in place measures to limit the housing numbers.**

## Reference: Housing Allocation Proformas, Appendix D of BLP 2013-2033 Submission Version

Recent consultations with developers in relation to one of the major housing development sites in the Sunningdale Parish area (Sunningdale Park) indicate that they intend to deliver many more homes than allocated in the BLP Housing Proformas – already 25% more on Sunningdale Park which the BLP lists as 230 residential dwellings whereas the developers are proposing almost 300 residential dwellings.

Our concern is that this will result in significant over-development, which will change the character of our area and place excessive pressure on an already congested highway infrastructure.

Housing Site Allocation Proformas in the BLP show 'estimated capacity' or 'approximate'. These are likely to be absolute minimum numbers with developers taking every opportunity to use these as starting points for subsequent increases.

The NPPF allows councils to deliver fewer homes than the OAHN where there are legitimate constraints. Many BLPs that have chosen to take this route have successfully passed inspection.

### REPRESENTATION 3

**The Council has failed to engage with the local community and Sunningdale Parish Council except through the formal Regulation 18 BLP Consultation. This is contrary to their own procedures, the NPPF and DCLG guidance. This lack of consultation has occurred from the issue of the Draft Regulation 19 BLP in June 2016 to the present,**

Section 1 of the October 2016 dated 'Statement of Community Involvement for the RBWM' highlights the importance of good community engagement in planning, as set out in the National Planning Policy Framework (NPPF), March 2012. The NPPF promotes early consultation with neighbourhoods, local organisations and businesses in the production of local plans.

The Council also failed to follow the Department for Communities and Local Government (DCLG) guidance that local planning authorities should work with the Parish Council to produce a complementary BLP.

Since the Ascot, Sunninghill and Sunningdale Neighbourhood Plan (AS&S NP) was adopted in April 2014, there has not been any direct engagement by the Council with Sunningdale Parish Council during the re-development of the BLP with a view to harmonising policies.

There has been no consultation between the council and SPC with reference to:

- The specified housing site allocations in the BLP within SPC:  
HA36 Broomhall Car Park, Sunningdale, 28 residential units  
HA37 White House, London Road, Sunningdale, 10 residential units  
HA34 Sunningdale Park, 230 residential units
- Planned infrastructure to support the above developments.

### REPRESENTATION 4

**The BLP and the Infrastructure Delivery Plan (IDP) fail to properly analyse, assess or identify the highway improvements required to mitigate the impact of the planned developments in Sunningdale. Neither do they set a sound strategy to deliver them.**

References: [Borough Local Plan: Infrastructure Delivery Plan – May 2017 \[Appendix E Report to Council 19th June 2017\]](#).  
[Royal Borough of Windsor and Maidenhead Local Plan Assessment using RBWM Strategic Highway Model – June 2017](#)

Section 14.1.1 of the BLP states: *“The timely provision of suitable and appropriate infrastructure is crucial to the wellbeing of the borough’s resident population...Infrastructure has not always historically kept pace with development and there are some parts of the borough where infrastructure demands are near to or at full capacity. Fundamental to delivering the spatial strategy is ensuring that the necessary social, physical and green infrastructure is in place to support the level of growth proposed...”*

Paragraph 5.1.13 states, *“The model is strategic in nature and local junction validation may be required if model outputs are to be used in detailed junction assessment.”*

The housing developments planned for Sunningdale will result in increased traffic flows, especially on the already congested A30, Chobham road and Broomhall Lane intersections.

This route is further exacerbated by the increase in traffic from the large Longcross development, just beyond Sunningdale, outside the Borough’s boundaries where approximately 1,700 residential units are planned as well as a business park for around 2,000 workers. The government’s classification of the area as one of the new “Green Villages” – Longcross Green Village- also confirms the scale of development we can expect. The main through route from this site to the M3 is currently along the Chobham road over a narrow, humpbacked railway bridge bend leading to its junction with the already busy A30. 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.

The Parish Council has not been consulted on mitigation for this increase in traffic through the village. This is especially relevant given that the A30 is one of the busiest roads in RBWM, it dissects Sunningdale village with traffic being further interrupted by the frequency of the railway level crossing closures.

## REPRESENTATION 5

### SPC Objects to the absence of parking provisions

Reference: [Section 6.4 Design, AND](#)  
[Section 6.5 Policy SP3 Character and Design of New Development](#)

The BLP now contains no reference at all to Parking requirements which is a major concern to Sunningdale residents. We know the roads are congested and on-street parking results in safety concerns but there is no real mention of parking provisions in the BLP policies.

Parking is a significant concern in Sunningdale.

Footfall for the retail outlets on the Chobham road and A30 in Sunningdale is positively correlated with the ability to park close by to the retail destination.

The BLP overlooks the fact that station car parking at Sunningdale station is at or beyond capacity. Parking on the Chobham road is restricted, there has been a loss of off street parking on the intersection of the Chobham road and A30 with the re designed car parking area outside Chancellors estate agent. This leaves Broomhall car park as one of the few viable parking alternatives. But, the BLP has allocated approximately 28 residential units to occupy this area.

The occupancy rate of retail outlets in Sunningdale village is under pressure. There are many unoccupied outlets at present. If there is no parking allocated to serve these outlets then the situation is likely to worsen.

## REPRESENTATION 6

### **Broomhall Car Park, HA 36**

SPC has not been consulted on the change of use of Broomhall car park or on the allocation of 28 residential units. The Parish Council would have preferred that the BLP Proforma stated under “Allocation” the requirement to provide car parking and small-scale retail, as set out in NP site policy NP/SS5.

## REPRESENTATION 7

### **The White House, HA37**

Single lane access from this site on to the busy A30 will be a major problem. The recent large two developments also use this single lane access as their only way of entering and exiting the A30.

10 residential units are allocated for the site, the occupants of which will also be required to use this same access. The BLP recognises access as a key consideration. The proposed number of dwellings recommended for The White House make this a potentially dangerous single lane junction with the A30.

**Cllr M Burn**  
**Cllr Y Jacklin**

*For and on behalf of Sunningdale Parish Council*

26<sup>th</sup> September 2017