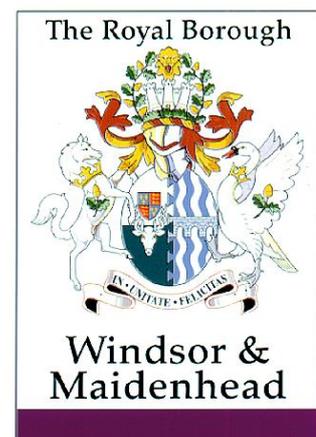


Consultation Statement

Scoping Report:
Core Strategy DPD and
Delivery and Development Principles DPD:

June 2008

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1.0 Consultation Statement

Introduction

- 1.1 This statement has been prepared¹, to accompany the Revised Sustainability Appraisal (SA) – Scoping Report: Core Strategy DPD and Delivery and Development Principles DPD and should be read in conjunction with this Report.
- 1.2 The Scoping Report: Core Strategy DPD and Delivery and Development Principles DPD was made available on the 6th February for a five-week period of consultation.
- 1.3 Several of the comments received required changes to be made to the central Sustainability Framework which will be used to inform future stages of the Sustainability Appraisal process and the associated development of the Core Strategy DPD and Delivery and Development Principles DPD.
- 1.4 The next stage of the Sustainability Appraisal process will be an appraisal of the options and alternatives for the Core Strategy DPD and Delivery and Development Principles DPD. The findings of the appraisal of the options will be published as part of the Issues and Options Papers. This will be followed by the Core Strategy DPD and Delivery and Development Principles DPD Sustainability Appraisal Report which is expected to be published alongside the Core Strategy and Policies Submission Paper in 2010.
- 1.5 RBWM's central Sustainability Appraisal Framework is available on the Sustainability Appraisal page on the Borough's website: http://www.rbwm.gov.uk/web/pp_sustainability_appraisal.htm
- 1.6 All parties notified about this Scoping Report will be informed about the subsequent stages of the SA process.

Public Consultation Exercise

- 1.7 The SA Scoping Report was published and made available for a five week period of consultation from 6th February to 12th March 2008. A copy of the document was sent to the Environment Agency, Natural England and English Heritage as 'authorities with environmental responsibilities'². These agencies were consulted on the content of the Scoping Report.
- 1.8 Other agencies / local groups and organisations such as those listed below were also informed about the document because of the environmental, social and economic aspects of the Report:

Berks, Bucks and Oxfordshire Wildlife Trust
Bracknell Forest Borough Council
Buckinghamshire County Council
Campaign for the Protection of Rural England
Cookham Society
Crown Estates Office
East Berkshire Ramblers Association
Farming and Wildlife Advisory Group (FWAG)
Forestry Commission
Friends of the Earth
Government Office for the SE (GOSE)

¹ In line with Regulation 21 (5) of the Environmental Assessment of Plans and Programmes Regulations 2004, and the Town and Country Planning (Local Development) (England) Regulations 2008 (Amended).

² As specified through the Environmental Assessment of Plans and Programmes Regulations 2004

Highways Agency
Jacobs
Joint Strategic Planning Unit
Maidenhead Civic Society
Maidenhead and District Chamber of Commerce
Maidenhead and District Housing Association
National Trust
Parish Councils
Reading Borough Council
Royal Society for the Protection of Birds
River Thames Society
Runnymede Borough Council
SE England Development Agency (SEEDA)
SE England Regional Assembly (SEERA)
Slough Borough Council
Society for the Protection of Ascot and Environs (SPAЕ)
South Bucks Council
Spelthorne Borough Council
Surrey County Council
Surrey Heath Borough Council
Thames Water
West Berkshire Borough Council
Windsor and District Chamber of Commerce
Windsor & Eton Society
Wokingham District Council
Wycombe District Council

1.9 In addition to the above, further steps were taken to draw attention to the Scoping Report: Core Strategy DPD and Delivery and Development Principles DPD. These were:

- The document was made available to view in the Council's Planning Reception and at all libraries throughout the Borough,
- Free copies of the document were available by request from the Planning Policy department, and
- The document and associated background information was also available on the Council's website for wider information and consultation.

1.10 Responses to the document were requested by Wednesday 12th March 2008, although representations were received and duly considered shortly after this period. No consultation responses were excluded. Details of the representations received are summarised in 2.0 of this document, and indicates the Council's response to each representation.

2.0 **Summary of Representations Received and the Council's Response**

2.1 This section summarises all representations received as a result of the consultation exercise.

2.2 In terms of the three statutory consultees, comments were received from the following bodies:

English Heritage	- Comments received (see table 1)
Natural England	- No comments received
Environment Agency	- No comments received

**Table 1: Scoping Report: Core Strategy DPD and Delivery and Development Principles DPD
Consultation Statement**

Respondent	Summary of Representation	Response
1. Society for the Protection of Ascot and Environs (SPAЕ)	Agree that all sections of the Scoping Report are accurate and appropriate.	Noted.
2. Jacobs	Welcome the inclusion of statutory and non-statutory international, national and local designation sites, as well as the reference to the condition of Sites of Special Scientific Interest (SSSIs), mitigation land in relation to the Thames Basin Heaths Special Protection Area (SPA), urban biodiversity and the UK Biodiversity Action Plan (BAP).	Support noted.
	Note that protected species are omitted from the list of considerations, formally covered by Policy N10 of the Local Plan. RBWM provides habitat for a number of protected species, not just those that are designated.	Partly agree. The RBWM Local Plan is included in the list of PPPSIs in Background Paper A. A further bullet point will be added to the Key Sustainability Issues (Natural Environment section) to recognise protected species.
	Jacobs notes that no reference is made to local Biodiversity Action Plans, which aim to identify local priorities and ensure that the national Species and Habitat Action Plan targets can be delivered at the local scale. Within the Royal Borough of Windsor and Maidenhead, the Berkshire County BAP and the Royal Borough of Windsor and Maidenhead BAP would be of relevance.	Partly agree. The Berkshire Biodiversity Action Plan (BAP) has been listed in the list of PPPSIs in Background Paper A. There is no individual Royal Borough of Windsor and Maidenhead BAP. No further action required.
	Note that there is no consideration for connectivity and the role that connecting habitats such as woodland, hedgerows and watercourses have in maintaining biodiversity. The saved Policy N7 of the Local Plan currently covers hedgerow retention.	Partly agree. The RBWM Local Plan is included in the list of Policies, Programmes and Initiatives (PPPSIs) in Background Paper A. A further bullet point will be added to the Key Sustainability Issues (Natural Environment section) to recognise the importance of connecting habitats. For information the Council is currently undertaking an open space audit, which includes an assessment of green infrastructure. The study aims to advise on actions to improve linkages between open spaces. Such open spaces also include sites with wildlife interest. This study will form part of the Council's evidence base for its Local Development Framework.
3. Maidenhead and District Chamber of Commerce	Key Sustainability Issues – Economy section. It should be made clear that 90% of visitor spending is centered in Windsor. Therefore any increase in visitor number is centered in Windsor, as is tourist related employment.	Agree. It will be made clear in the Key Sustainability Issues that Windsor is the principle visitor destination.

Respondent	Summary of Representation	Response
	<p>Key Sustainability Issues – Town District and Local Centres section. The first bullet point should read “Maidenhead has a more local catchment area than Windsor and had a poor range of specialist and non food shops, but is a major centre for convenience goods. Maidenhead has scope to improve its status in comparison goods”. This reflects the more up to date position as the non food retail choice in Maidenhead has deteriorated more recently.</p>	<p>Partly agree. The Key Sustainability Issues has been addend to read, ‘ <i>Windsor provides for the convenience and comparison needs of the local population. In catering for an extensive tourism market, the centre is characterised by its upmarket comparison goods offer</i>’. And, ‘<i>Maidenhead provides the principal commercial centre supporting the shopping needs of the Royal Borough’s population. Improvements to the choice of both retail and leisure facilities would contribute to the strengthening of the centre against nearby centres which are performing more strongly</i>’. This reflects the findings of the Windsor and Maidenhead Retail and Leisure Study (April 2006).</p>
	<p>SA Objective 10. Economic growth (particularly retail) should be re-inserted with reference to Maidenhead as the tourism sector only applies to Windsor. Disagree with omitting RSF objective 11 (economic revival). Consider it is appropriate to the needs of Maidenhead Town Centre today.</p>	<p>Agree. SA objective 10 will be amended to read ‘<i>Sustain economic growth and competitiveness and a buoyant, sustainable tourism sector by focusing on the principles of smart growth</i>’. RSF objective 11 has been added to the SA framework and amended slightly to read ‘<i>stimulate economic revival where necessary</i>’ as this may be appropriate for the revitalisation of Maidenhead in particular.</p>
	<p>SA Framework Table 4. 10b under “targets” add “aim to increase the vitality and viability of Maidenhead Town Centre by drawing up a Master Plan for redevelopment”.</p>	<p>Partly agree. Issues regarding the vitality and viability of Maidenhead Town Centre are presently being addressed through PROM (Partnership for the Regeneration of Maidenhead). A target will be added to reflect this.</p>
<p>4. Chester-Fanshaw Ltd Property Development Managers</p>	<p>Baseline Data section 2a, bullet 4. The strategic housing allocation is noted as an average of 281 dwellings per annum (dpa) to 2026. This information is now out of date. The EIP Panel, when reviewing the Draft SE Plan, recommended an additional figure of 65 dpa, which would bring the total for RBWM up to 346 dpa, an increase of 23%. This is a significant increase and it is suggested that section 2a be revised accordingly.</p>	<p>Agree. This bullet point will be amended to read ‘<i>The Submission Draft South East Plan allocates the borough 281 net dwellings per annum to 2026. The Panel Report recommended an increase to 346 net dwellings per annum. The Government has yet to respond to this. Proposed modifications are expected to be published during summer 2008</i>’. The relevant bullet point in the Key Sustainability Issues section has also been amended to read ‘<i>The number of houses that are required to be built in the borough each year (the strategic housing allocation) is currently under review by the Government</i>’.</p>

Respondent	Summary of Representation	Response
	<p>Key Sustainability Issues – section 3.3.1 (Housing – second bullet). The bullet point states “<i>Maidenhead is one of the preferred locations for future development in the Borough</i>”. Whilst this is superficially correct, it appears to contradict paragraph 1.3.2. which says “...there will be a focus on ...Maidenhead and Windsor in relation to site allocations...”. It would appear the Council has already elevated Maidenhead above Windsor in the hierarchy of locations for development without any justification and contrary to Structure Plan policy, where both settlements have equal standing. This section should be revised accordingly.</p>	<p>Agree. In section 3.3.1, under ‘housing’ the relevant bullet point will be amended to read ‘<i>There will be a focus on Windsor and Maidenhead in relation to site allocations for housing</i>’. Under Economy a bullet point has been added to read ‘<i>There will be a focus on Windsor and Maidenhead in relation to site allocations for employment, retail, leisure and tourism related development</i>’.</p>
<p>5. Thames Water</p>	<p>Sustainability objective 20: A key sustainability objective for the preparation of the new LDF should be for new development to be co-ordinated with the infrastructure it demands and to tackle into account the capacity of existing infrastructure.</p> <p>Paragraph 4.9 of PPS12, 2004 states, “<i>LPAs should ensure that delivery of housing and other strategic and regional requirements is not compromised by unrealistic expectations about the future availability of infrastructure, transportation and resources. Annex B sets out future guidance on resources, utilities and infrastructure provision</i>”.</p> <p>Paragraphs B3 to B8 of PPS12 place specific emphasis on the need to take account of water supply and sewerage infrastructure in preparing Local Development Documents. Paragraph B3 in particular states: “<i>The provision of infrastructure is important in all major new developments. The capacity of existing infrastructure and the need for additional facilities should be taken into account in the preparation of <u>all</u> local development documents. Infrastructure here includes water supply and sewers, waste facilities....</i>”</p> <p>The list of sustainability objectives should therefore make reference to the provision of water and sewerage infrastructure to service development. This is essential to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low pressure water supply problems. It is also important that the satisfactory provision of water and sewerage infrastructure forms and integral part of the sustainability appraisal.</p> <p>The water companies’ investment programmes are based on a 5 year cycle known as the Asset Management Plan (AMP) process. AMP4 is the current period, which runs from 1st April 2005 to 31st March 2010 and does not therefore cover the whole LDF period. AMP5 will cover the period from 1st April 2010 to 31st March 2015 and Thames Water is currently preparing its business plan submission to OFWAT.</p>	<p>In light of Draft PPS12, the implications for an infrastructure planning process and the emphasis on evidencing delivery, there is a need to ensure that the emerging Core Strategy addresses this issue completely. However, as SA objective 20 (22 in the Revised Scoping Report) is concerned with sustainable water resources management, water infrastructure issues will be picked up through the SA process. No further action required.</p>

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	<p>As part of our five year business plan Thames Water advise OFWAT on the funding required to accommodate growth in its networks and at all its treatment works. As a result Thames Water base its investment programmes on development plan allocations which form the clearest picture of the shape of the community (as mentioned in PPS12 paragraph B6). Where the infrastructure is not available we may require an 18-month to three-year lead in time for provision of extra capacity to drain new development sites. If any large engineering works are needed to upgrade infrastructure the lead in time could be up to five years. Implementing new technologies and the construction of new treatment works could take up to ten years.</p>	
	<p>Sustainability objective 12: Flood Risk. PPS25: Development and Flood Risk and the associated Practice Guide state that reducing the risk of flooding should be identified as a SA objective if relevant locally.</p> <p>When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.</p> <p>Flood risk sustainability objectives should also make reference to 'sewer flooding' as identified in Annex C of PPS25 and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure is not in place ahead of development.</p>	<p>Agree that water sewerage infrastructure development may be necessary in flood risk areas. However, SA objective 12 (14 in the Revised Scoping Report) covers flooding from all sources. No further changes are necessary.</p>
6. English Heritage	<p>Surprised that the historic environment and the potential for impact upon it has such a low profile in the Scoping report given the quality of the borough's historic environment, the pressure that it is under and the contribution it can be expected to make towards a sustainable strategy.</p>	<p>Disagree. It is not considered that it has a low profile in the Scoping Report. The SA Baseline Data Report (section 15) contains a whole section on the Quality of the Built Environment including the historic environment. The main facts regarding the historic environment are bulleted in the Key Sustainability Issues section (3.3). SA objectives 7 and 16 (renumbered 18) also refer to the historic environment. No further action required.</p>
	<p>In terms of Issues and Problems (section 3.3.1), there is reference to some residents expressing concern for loss of neighbourhood character, but little else on the environment.</p>	<p>Disagree. The section contains information on all aspects of the environment such as the natural and built environment, air and noise, and energy and</p>

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		resources. No further action required.
	There is a limited choice of indicator(s) (Buildings at Risk) in the SA Framework. It is recommended to consult with the RBWM Conservation Team on the SA Framework, Objectives, Indicators and Targets.	Agree. Following consultation with the RBWM Conservation Team the following indicators have been added to the SA Framework. ' <i>% of conservation areas with a character appraisal</i> ' and ' <i>% of conservation areas with a character appraisal with management proposals updated in the last 5 years</i> '.
	A list of documents was provided to add to the PPPSI Review.	Documents added to PPPSI Review where relevant.
7. Highways Agency (HA)	In the case of RBWM, the Strategic Road Network (SRN) relates to the M4 Junction 5 to 10, A404, A308(M) and the M25 Junction 13–14. Certain sections of the identified SRN do not lie within the borough but have been identified due to being potentially impacted by the LDF.	Noted.
	The HA would have serious concerns if any additional traffic were to be added to the SRN or its junctions without careful consideration to mitigation measures. These should include demand management measures in accordance with DfT Circular 02/2007.	Agree. DfT Circular 02/2007 has been added to the list of PPPSIs.
	Transport, as a sustainability criteria should be given a high weighting when appraising the two DPDs.	Agree. Transport is considered fundamental to sustainable development which is why SA objective 17 (renumbered 19) has been included. This ensures that all policies and proposals in the DPDs are tested for their ability to reduce congestion, and encourage use of alternative forms to transport to the car. SA objectives are not weighted. Where a policy or proposal had a particularly negative effect on transport, mitigation measures would be investigated. No further action required.
	HA acknowledges that PPG13 is included in Background Paper A.	Noted.
	HA is encouraged to see that Background Paper B contains a section on transport and accessibility and this will aid in the preparation of the DPDs.	Noted.
	SA Framework: Support SA objectives 7 and 17 as they are aligned with the principles of PPG13. Objective 17 could be expanded to encourage that trips are minimised at source and travel demand is managed. Could use the following wording: ' <i>Reduce the need to travel and lessen impact on the local and strategic road network by minimising trips at source and managing travel demand</i> '.	Support noted for SA objectives 7 and 17 (renumbered 19). To better align with the suggested wording, SA objective 17 (renumbered 19) has been reworded to read the same as the Regional Sustainability Framework (RSF) objective 21, ' <i>Improve the efficiency of transport networks by enhancing the proportion of travel by sustainable</i>

Respondent	Summary of Representation	Response
		<i>modes and by promoting policies which reduce the need to travel.</i>
	Could consider a new indicator for SA objective 17; <i>'Percentage of new development which is meeting its travel plan objectives'</i> .	Disagree. The RBWM Annual Monitoring Report (AMR) already contains several indicators that are monitored annually. These include the accessibility of new development to certain services. No further action required.
	Objective 17 indicator (a) <i>Average daily traffic flows</i> is not regarded as a robust measure of congestion. This could be changed to <i>'Journey times'</i> .	Agree. The new National Indicator 167, <i>'Congestion – average journey time per mile during the morning peak'</i> , has been added to the SA framework under SA objective (renumbered) 19.
	A number of targets have not been set. Targets for each objective need to be specific, measurable, agreed and timely.	Noted although some of these are outside of the control of the local authority.
8. West Waddy ADP on behalf of the Rayner Family Trust.	<p>Section 3.3 Sustainability Issues and Problems.</p> <p>In the section entitled 'housing' you have listed the following: <i>'Maidenhead is one of the preferred locations for further development in the borough' and 'Almost all housing is built within existing settlements and on previously developed land.'</i></p> <p>These are policy options, rather than sustainability issues and it is not appropriate for the Council to include them in this list. The purpose of identifying sustainability issues and problems is to define the key issues for the Development Plan Document to address such as a lack of affordable housing, flooding, transport congestion. As you will be aware, the development of policy options comes later at stage B2 in the Sustainability Appraisal process, as the Council investigates the alternative ways of addressing these issues and problems.</p>	<p>Agree. In section 3.3.1, under 'housing' the relevant bullet point will be amended to read <i>'There will be a focus on Windsor and Maidenhead in relation to site allocations for housing'</i>.</p> <p>Agree. In response to comments from other respondents, the word <i>'currently'</i> has been added to the third bullet in Housing and now reads <i>"Almost all housing is currently built within existing settlements and on previously developed land"</i>. This is a fact.</p>
	Other issues and problems: <i>'Housing is increasingly being developed at high densities and some residents feel that this is to the detriment of the character of their neighbourhoods.'</i> This indicates that putting all of the development within existing urban areas may be both unrealistic and unsustainable, as it may adversely affect the character of existing urban areas and perhaps lead to the loss of valuable areas of open space. In defining the issues and problems in this way, you will be excluding alternative, perhaps more sustainable options from serious consideration in further stages of the SA. This was also a concern of the Inspector who carried out the examination into the failed Windsor & Maidenhead Core Strategy. He stated in paragraph 11.6 of his report that <i>'although the Council claims otherwise, I am also concerned that resistance to a review of the Green Belt boundaries at this time might exacerbate pressures for development on land with poor sustainability credentials and possibly, land that is subject to higher levels of flood risk and/or affected by Special Protection Area considerations.'</i>	Agree. The bullet point has been deleted.

Respondent	Summary of Representation	Response
	<p>In contrast to the Sustainability Scoping Report's statement that <i>'almost all housing is built within existing settlements and on previously developed land'</i>, the Inspector stated in paragraph 11.3 of his report <i>'unfortunately, I am doubtful if the strategic land requirements to 2026 can be almost entirely satisfied by recycling previously developed land within settlement boundaries. As mentioned previously, the Council places a heavy reliance on unidentified windfall provision to supplement provision from the allocated sites that it is assumed will emerge from the Urban Potential Review exercise. Windfall opportunities are, however, a finite resource and the future supply is likely to be constrained by flood risk and Special Protection Area considerations and the sustainable community and affordable housing requirements set out in policies CS16 and CS18 respectively. Because the Green Belt is hard up to the boundaries of the largest settlements in the Royal Borough, there has been a heavy reliance on windfall opportunities for a considerable period of time.'</i></p>	<p>Agree. The statement <i>'almost all housing is built within existing settlements and on previously developed land'</i> is a statement of fact up to the present time as measured by indicator H1 in the Councils Annual Monitoring Report. The statement does not refer to future strategic land requirements or windfall development. No further action required.</p>
	<p>The Inspector went on to state in paragraph 11.4 that <i>'my doubts regarding the land supply arrangements are reinforced by the recently published PPS3. While I accept that the existing stock of planning permissions probably satisfies the current 5 year deliverable land supply requirement, the 10 year (and 11 to 15 year) developable land test is not met from specific developable sites.'</i> This led him to conclude that <i>'if additional sites are to be identified to ensure compliance with the rolling developable land test, in my judgement it will be necessary to look at land resources beyond existing settlement boundaries – much of this land enjoys Green Belt status.'</i></p> <p>With regard to where the Green Belt releases should be, the Inspector commented in paragraph 11.14 that <i>'in practice, any releases are likely to be at the two main settlements and in particular, perhaps at Maidenhead to accord with policy CS1 but this is a matter more properly for the Council to consider as part of the boundary review that I consider to be both appropriate and necessary in order to ensure that strategic land requirements are met.'</i></p> <p>In our view, therefore, it is essential that a rigorous Green Belt review is carried out to inform the Windsor & Maidenhead Core Strategy. In this respect, our concerns have been aroused by the news release on your web site dated 28th January 2008, which is entitled <i>'Council determination to protect the Green Belt.'</i> The opening sentence states <i>'The Royal Borough has underlined its determination to protect the "precious" Green Belt against housing and office development – despite being forced by the Government to carry out a review of its contribution to national Green Belt purposes.'</i> It goes on to state that <i>'the cross-party message from meetings of both cabinet and the planning and environment overview and scrutiny panel (Thursday January 24th) was that the Green</i></p>	<p>These comments are not specific to the SA. The Council is currently undertaking a Green Belt analysis study which will feed into the Core Strategy DPD and the Delivery and Development DPD Issues and Options Papers. No further action required.</p>

Respondent	Summary of Representation	Response
	<p><i>Belt review would be carried out with the greatest reluctance.</i> This does not suggest an unbiased and open consideration of the issues.</p> <p>In this respect, we consider that it would be the worst possible outcome for the Royal Borough to formulate a second Core Strategy and then to have that also rejected as unsound for the same reasons as the first one. For this reason, we consider that it is essential that the Green Belt review is comprehensive and conducted with an open mind and that the sustainability implications are properly considered in the accompanying Sustainability Appraisal.</p> <p>My clients would like to assist you in this process with regard to their land at Berkyn Manor Farm, Horton, which they have put forward as a site suitable for development.</p>	
	<p>A related topic, which is also of significant concern is the difficulty under current policies of finding an economic use for existing buildings in the Green Belt, particularly redundant farm buildings. For example, the Rayner Family Trust own Berkyn Manor Farm and the adjoining stables and dairy. These buildings form an historic complex of nineteenth century buildings and the dairy is listed. If these buildings are to be retained and sufficient financial resources found to pay for their restoration, it is imperative that they are brought into economic use. At present a significant obstacle to this is provided by clause 2 of Policy GB8, which states:</p> <p><i>'The change of use of more than 300m² of floorspace to business and industrial uses within any individual agricultural unit or single complex of adjacent buildings will not be permitted except that some flexibility in this floorspace limit may be allowed if the benefits of diversification to the purpose of the Green Belt can be demonstrated.'</i></p> <p>Policy GB3, which relates to new residential development in the Green Belt also states in clause 6 that where the proposal relates to the re-use of a building, it is to be in <i>'accordance with policy GB8,'</i> which as quoted above imposes the 300m² floorspace limit.</p> <p>This 300 m² limit on re-use of buildings for business, industrial and residential uses is a major problem at Berkyn Manor where the total floorspace of the Manor and stables amounts to 2,462 m². In this respect we note that these policies, which in practice can prevent the restoration and re-use of existing historic buildings, potentially conflict with the achievement of a number of your sustainability objectives as outlined in your Sustainability Appraisal Scoping Report, particularly:</p> <p>Objective 11: Re-use previously developed land and existing materials from buildings,</p>	<p>Disagree. It is irrelevant whether SA objectives 11 and 16 conflict (or otherwise) with Local Plan policies. The SA objectives have been set to appraise new Local Development Framework policies and objectives. No further action required.</p>

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	<p>and ensure that there is a high quality townscape; Objective 16: Protect and enhance the borough's countryside and historic environment.</p> <p>We would, therefore, request that you review these policies as part of your Green Belt review and the development of options for your Core Strategy and Delivery & Development Principles Development Plan Documents.</p>	
<p>9. West Waddy ADP on behalf of Rayner Brothers.</p>	<p>Section 3.3 Sustainability Issues and Problems. In the section entitled 'housing' you have listed the following: <i>'Maidenhead is one of the preferred locations for further development in the borough' and 'Almost all housing is built within existing settlements and on previously developed land.'</i></p> <p>These are policy options, rather than sustainability issues and it is not appropriate for the Council to include them in this list. The purpose of identifying sustainability issues and problems is to define the key issues for the Development Plan Document to address such as a lack of affordable housing, flooding, transport congestion. As you will be aware, the development of policy options comes later at stage B2 in the Sustainability Appraisal process, as the Council investigates the alternative ways of addressing these issues and problems.</p>	<p>Agree. In section 3.3.1, under 'housing' the relevant bullet point will be amended to read <i>'There will be a focus on Windsor and Maidenhead in relation to site allocations for housing'</i>.</p> <p>Agree. In response to comments from other respondents, the word 'currently' has been added to the third bullet in Housing and now reads <i>"Almost all housing is currently built within existing settlements and on previously developed land'</i>. This is a fact.</p>
	<p>Other issues and problems: <i>"Housing is increasingly being developed at high densities and some residents feel that this is to the detriment of the character of their neighbourhoods.'</i> This indicates that putting all of the development within existing urban areas may be both unrealistic and unsustainable, as it may adversely affect the character of existing urban areas and perhaps lead to the loss of valuable areas of open space. In defining the issues and problems in this way, you will be excluding alternative, perhaps more sustainable options from serious consideration in further stages of the SA. This was also a concern of the Inspector who carried out the examination into the failed Windsor & Maidenhead Core Strategy. He stated in paragraph 11.6 of his report that <i>'although the Council claims otherwise, I am also concerned that resistance to a review of the Green Belt boundaries at this time might exacerbate pressures for development on land with poor sustainability credentials and possibly, land that is subject to higher levels of flood risk and/or affected by Special Protection Area considerations.'</i></p>	<p>Agree. The bullet point has been deleted.</p>
	<p>In contrast to the Sustainability Scoping Report's statement that <i>'almost all housing is built within existing settlements and on previously developed land'</i>, the Inspector stated in paragraph 11.3 of his report <i>'unfortunately, I am doubtful if the strategic land requirements to 2026 can be almost entirely satisfied by recycling previously developed land within settlement boundaries. As mentioned previously, the Council places a</i></p>	<p>Agree. The statement <i>'almost all housing is built within existing settlements and on previously developed land'</i> is a statement of fact up to the present time as measured by indicator H1 in the Councils Annual Monitoring Report. The statement</p>

Respondent	Summary of Representation	Response
	<p><i>heavy reliance on unidentified windfall provision to supplement provision from the allocated sites that it is assumed will emerge from the Urban Potential Review exercise. Windfall opportunities are, however, a finite resource and the future supply is likely to be constrained by flood risk and Special Protection Area considerations and the sustainable community and affordable housing requirements set out in policies CS16 and CS18 respectively. Because the Green Belt is hard up to the boundaries of the largest settlements in the Royal Borough, there has been a heavy reliance on windfall opportunities for a considerable period of time.'</i></p>	<p>does not refer to future strategic land requirements or windfall development. No further action required.</p>
	<p>The Inspector went on to state in paragraph 11.4 that <i>'my doubts regarding the land supply arrangements are reinforced by the recently published PPS3. While I accept that the existing stock of planning permissions probably satisfies the current 5 year deliverable land supply requirement, the 10 year (and 11 to 15 year) developable land test is not met from specific developable sites.'</i> This led him to conclude that <i>'if additional sites are to be identified to ensure compliance with the rolling developable land test, in my judgement it will be necessary to look at land resources beyond existing settlement boundaries – much of this land enjoys Green Belt status.'</i></p> <p>With regard to where the Green Belt releases should be, the Inspector commented in paragraph 11.14 that <i>'in practice, any releases are likely to be at the two main settlements and in particular, perhaps at Maidenhead to accord with policy CS1 but this is a matter more properly for the Council to consider as part of the boundary review that I consider to be both appropriate and necessary in order to ensure that strategic land requirements are met.'</i></p> <p>In our view, therefore, it is essential that a rigorous Green Belt review is carried out to inform the Windsor & Maidenhead Core Strategy. In this respect, our concerns have been aroused by the news release on your web site dated 28th January 2008, which is entitled <i>'Council determination to protect the Green Belt.'</i> The opening sentence states <i>'The Royal Borough has underlined its determination to protect the "precious" Green Belt against housing and office development – despite being forced by the Government to carry out a review of its contribution to national Green Belt purposes.'</i> It goes on to state that <i>'the cross-party message from meetings of both cabinet and the planning and environment overview and scrutiny panel (Thursday January 24th) was that the Green Belt review would be carried out with the greatest reluctance.'</i> This does not suggest an unbiased and open consideration of the issues.</p> <p>In this respect, we consider that it would be the worst possible outcome for the Royal Borough to formulate a second Core Strategy and then to have that also rejected as unsound for the same reasons as the first one. For this reason, we consider that it is</p>	<p>These comments are not specific to the SA. The Council is currently undertaking a Green Belt analysis which will feed into the Core Strategy DPD and the Delivery and Development DPD Issues and Options Papers. No further action required.</p>

Respondent	Summary of Representation	Response
	<p>essential that the Green Belt review is comprehensive and conducted with an open mind and that the sustainability implications are properly considered in the accompanying Sustainability Appraisal.</p>	
	<p>A related topic, which is also of significant concern is the difficulty under current policies of finding an economic use for existing buildings in the Green Belt, particularly redundant farm buildings. At present a significant obstacle to this is provided by clause 2 of Policy GB8, which states:</p> <p><i>'The change of use of more than 300m² of floorspace to business and industrial uses within any individual agricultural unit or single complex of adjacent buildings will not be permitted except that some flexibility in this floorspace limit may be allowed if the benefits of diversification to the purpose of the Green Belt can be demonstrated.'</i></p> <p>Policy GB3, which relates to new residential development in the Green Belt also states in clause 6 that where the proposal relates to the re-use of a building, it is to be in 'accordance with policy GB8,' which as quoted above imposes the 300m² floorspace limit.</p> <p>We note that these policies, which in practise can prevent the restoration and re-use of existing historic buildings, potentially conflict with the achievement of a number of your sustainability objectives as outlined in your Sustainability Appraisal Scoping Report, particularly:</p> <p>Objective 11: Re-use previously developed land and existing materials from buildings, and ensure that there is a high quality townscape;</p> <p>Objective 16: Protect and enhance the borough's countryside and historic environment.</p> <p>We would, therefore, request that you review these policies as part of your Green Belt review and the development of options for your Core Strategy and Delivery & Development Principles Development Plan Documents.</p> <p>My clients would like to assist you in this process with regard to their land at Stubbings Farm, Burchetts Green, which they have put forward as a site for development.</p>	<p>Disagree. It is irrelevant whether SA objectives 11 and 16 conflict (or otherwise) with Local Plan policies. The SA objectives have been set to appraise new Local Development Framework policies and objectives. No further action required.</p>
10. Windsor & Eton Society	<p>Question 1: Agree PPPSI Review is accurate. It would have been more convenient to have this attached as an appendix to the Scoping Report rather than as a separate document.</p>	<p>Disagree. The Council has attached the PPPSI Review as an appendix in the past and been criticised for producing long and complicated documents. In this instance it was trying to address</p>

Respondent	Summary of Representation	Response
		this concern. The Council accepts that there are disadvantages to both approaches. No further action required.
	Question 2: Agree the baseline data contains appropriate information. It would have been more convenient to have this attached as an appendix to the Scoping Report rather than as a separate document.	Disagree. The Council has attached the baseline data as an appendix in the past and been criticised for producing long and complicated documents. In this instance it was trying to address this concern. The Council accepts that there are disadvantages to both approaches. No further action required.
	<p>Question 3: Agree that these are the key sustainability issues for the Royal Borough but would also like to add the following to section 3.3:</p> <p><u>Housing</u> Mention the needs and provision for people living longer. Sustainable provisions in new-build. Provision of family housing still required.</p> <p><u>Transport and Accessibility</u> Provision of cycle paths/routes – promotion of this form of transport Borough’s transport facilities on low carbon emission vehicles. Advantage card/bus passes – free bus transport for OAP’s. Problems with parking in Windsor needs to be addressed.</p> <p><u>Economy</u> Indicate the numbers of visitors who stay in Windsor for more than one day.</p> <p><u>Leisure and Culture</u></p>	<p>Noted.</p> <p>Disagree. Housing: Under ‘Population’ it is noted that the number of older people in the borough is high and expected to increase. The DPDs will need to take account of this. No further action required.</p> <p>Agree. Under ‘Quality of the Built Environment’ a sentence will be added ‘<i>The Borough needs to promote and support sustainable design and construction in keeping with the local area</i>’.</p> <p>Agree. Under ‘Housing’ a sentence will be added, ‘<i>It is important to encourage a greater range of different types and sizes of homes to be developed</i>’.</p> <p>Transport and Accessibility: ‘Alternative forms of transport to that of the car should be encouraged’ will be added. The words ‘<i>and low carbon emission vehicles</i>’ has been added to the first bullet point under ‘Use of Energy Resources’.</p> <p>Economy: ‘<i>Staying trips result in an estimated 1.91 million bednights in the Borough</i>’ will be added to the economy section.</p> <p>Town, District and Local Centres: ‘<i>create and maintain local distinctiveness</i>’ will be added.</p> <p>No data exists on the loss of private gardens.</p>

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	<p>Need a museum and gallery in Windsor.</p> <p><u>Town, District and Local Centres</u> Local distinctiveness needs to be encouraged and nurtured.</p> <p><u>Natural Environment</u> Open space is especially important in towns. Although no public space has been lost as a result of development, private gardens which contribute to wildlife have been lost. This needs to be monitored.</p> <p><u>Quality of the Built Environment</u> It is very important to ensure that all developments are of high quality design and in keeping with the area.</p>	<p>Quality of the Built Environment: sentence added as above.</p>
	<p>Question 4 SA Framework Indicator 6c is very disappointing and needs to be addressed as a high priority. Suggest the following</p> <ul style="list-style-type: none"> • RBWM provision of community officers to assist in the prevention of crime. • The adoption of no smoking policy in public places throughout the borough • Adoption of sustainability procedures in running the borough • The introduction of character statements which will be considered when new applications are submitted. 	<p>Disagree. The first three bullet points are beyond the remit of the planning system. No further action required.</p>
	<p>Question 5 Agree (with additions to key sustainability issues as above).</p>	<p>Support noted.</p>
<p>11. RSPB</p>	<p>Question 1: The list of PPPSis is largely comprehensive. Need to add Draft Interim Strategic Delivery Plan (SEERA).</p>	<p>Agree. The Draft Interim Strategic Delivery Plan will be added to the list of PPPSis.</p>

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	<p>Question 2: Although identified in the relevant lists of national and international nature conservation designations, the map of the borough's nature conservation designations (Map 15.1), on page 66 of Background Paper B, fails to identify the part of Chobham Common SSSI/Thames Basin Heaths SPA within the borough. This is a glaring omission, given the significant issues surrounding the need to protect the SPA from the effects of new housing in the borough.</p>	<p>Partly agree. Background Paper B does recognise that only a small section of Chobham Common SSSI lies within the borough (0.64 ha) and that the majority of the SPA lies within the neighbouring counties of Surrey and Hampshire. As the map only shows designations within the borough boundary, the SPA is not large enough to show up on the map. In due course, when Background Paper B is updated, the map will be amended to show the SPA adjacent to the borough boundary.</p>
	<p>Question 3: Recommend that the fifth bullet point listed under Natural Environment should more accurately state that:</p> <ul style="list-style-type: none"> • New semi-natural greenspace will have to be found to allow new housing development to go ahead in the south of the borough without incurring negative effects on the Thames Basin Heaths SPA. 	<p>Agree. This will be amended.</p>

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	<p>Question 4: Caveats should be added to the following objectives.</p> <p>Objective 7 - should include the proviso that improved access to the countryside does not impact on designated nature conservation interests.</p> <p>Objective 11 – regard will be taken to the nature conservation value of previously developed land, as per the acknowledgement on page 16 of the report that <i>‘The Borough will need to recognise the value of urban biodiversity and the potential negative effects of building on previously developed land’</i>.</p> <p>Given the significance of the need to protect the Thames Basin Heaths SPA from new housing in the south of the borough, we would recommend some further indicators under Objective 15: Suggested new indicators:</p> <p>Indicator: Trends of Annex 1 heathland birds on the Thames Basin Heaths SPA. Target: SPA populations continue to recover, in line with national populations.</p> <p>Indicator: Numbers of visitors to the Thames Basin Heaths SPA. Target: No significant increase in visitor numbers from baseline.</p> <p>Indicator: Visitor numbers on new areas of SANG created in order to offset the impacts of housing within the borough. Target: Visitor numbers increased as predicted, in line with new population.</p> <p>The visitor data are likely to be jointly collected by the Thames Basin Heaths local authorities as part of the emerging Strategic Delivery Plan, forming a key element of the wider monitoring of the mitigation measures across the SPA. The Annex 1 bird data is collected annually as part of Natural England’s ongoing monitoring. However, it will be necessary for the Council to analyse these data at a local level, in order to monitor the effects of local measures implemented to offset new housing in the borough.</p>	<p>Disagree. No amendment to SA objective 7 should be made as any impact on designated nature conservation interests would be covered in SA objectives 15 (renumbered 17) (biodiversity) and 16 (renumbered 18) (protection of the countryside).</p> <p>Disagree. No amendment to SA objective 11 (renumbered 13) should be made as regard will be had to the nature conservation value of previously developed land under SA objective 15 (renumbered 17) (biodiversity).</p> <p>Agree that indicators are necessary to show how the Thames Basin Heaths SPA needs to be protected from new housing in the south of the borough. As these are still under discussion at the time of writing, an indicator has been inserted under SA objective 15 (renumbered 17) to read <i>‘Impact of housing development on the Thames Basin Heaths SPA’</i>. Under current trends it will be noted that <i>‘indicators on heathland birds and visitor numbers with respect to the SPA are currently under discussion’</i>.</p>

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	<p>Would welcome the addition of a further target against Objective 21. To help meet this objective, a suitable target would be an aim to deliver at least 20% of energy from renewable sources on all new residential and commercial developments.</p>	<p>Partly agree. The South East Plan policy EN1 states '<i>encourage developers to submit an assessment of a development's energy demand and provide at least 10% of the development's energy demand from renewable sources for housing schemes of over 10 dwellings and commercial schemes over 1,000m²</i>'. Any local variation on this target would need to be debated through the development of a DPD. For information, a RBWM Sustainable Design and Construction SPD is currently being developed and at the time of writing. A target has been added to the SA Framework under SA objective 21 (renumbered 23) to reflect the South East Plan target.</p>
	<p>Question 5: Subject to the above comments, we agree that the scoping report sets a good framework for the sustainability appraisal of the two DPDs.</p>	<p>Support noted.</p>
<p>12. Wokingham Borough Council</p>	<p>Question 1: List of PPPSIs is generally comprehensive. Details of the emerging Local Development Frameworks of adjoining authorities need to be included.</p>	<p>Support noted. Details of emerging LDFs of adjoining authorities will be added where appropriate.</p>
	<p>Question 2: The baseline information for the Sustainability Appraisal is appropriate.</p>	<p>Support noted.</p>
	<p>Question 3: It is considered that some of the issues for the Sustainability Appraisal should be amended. The third bullet in Housing should read "Almost all housing is currently built within existing settlements and on previously developed land". In Landscape and Open Space, the first bullet should read "The presence of (83%) Green Belt and preservation of landscape character has historically constrained where development occurs in the borough." These changes would recognise that land may need to be removed from the Green Belt in order that RBWM can deliver the strategic requirements for development, in accordance with the South East Plan Panel.</p>	<p>Agree. In response to comments from other respondents, the word '<i>currently</i>' will be added to the third bullet in Housing and now reads "<i>Almost all housing is currently built within existing settlements and on previously developed land</i>". In Landscape and Open Space, the first bullet will be amended to read "<i>The presence of (83%) Green Belt and preservation of landscape character has historically constrained where development occurs in the borough.</i>"</p>

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	<p>Question 4: The importance of economic growth in numbers 9 and 10 should be included in the objectives. The exclusion of economic growth from the objectives could lead to a potential conflict with the emerging South East Plan, especially due to the importance placed on this in the deliberations of the Panel. It is also being given greater priority with the creation of the Berkshire Economic Strategy Board.</p> <p>With respect to the proposed targets, the following comment is made: Target 1A – should read “to meet housing completion targets of at least 281 pa averaged over the Plan period (2006-2026)....” to ensure consistency with PPS3.</p> <p>Question 5: It is agreed that the Scoping Report (taking account of the comments above) is likely to set out an appropriate methodology for the Sustainability Appraisal of the two Development Plan Documents.</p>	<p>Agree. SA objective 10 will be amended to read ‘<i>Sustain economic growth and competitiveness and a buoyant, sustainable tourism sector by focusing on the principles of smart growth</i>’.</p> <p>The target will be amended to read ‘<i>meet housing completion targets as set out in the Borough’s strategic housing allocation</i>’. This recognises that the South East Plan housing figures are still under review.</p> <p>Support noted.</p>
13. SEEDA	<p>Glossary: Support the definition of SMART growth but consider that the delivery of SMART growth will require some additional land and labour supply from outside the borough.</p> <p>SA Objectives Out of a total of 21 objectives, only 3 are economic objectives, although it is acknowledged that 1 and 17 are cross cutting and till have economic impacts. Surprised that references to economic growth have been removed.</p> <p>Could split objective 10 into two objectives –</p> <ul style="list-style-type: none"> • Sustain economic competitiveness and enable economic growth • Sustain a buoyant economy and sustainable tourism sector <p>Could also add</p> <ul style="list-style-type: none"> • Maintain a dynamic, diverse and knowledge-based economy that excels in innovation with higher value, lower impact activities 	<p>Agree. Definition will be amended.</p> <p>Disagree. The Council does not see any benefit in splitting SA objective 10 into two parts. However, RSF objective 11 has been added to the SA framework and amended slightly to read ‘<i>stimulate economic revival</i>’ as this may be appropriate for the revitalisation of Maidenhead in particular. RSF objective 12 will also be added to the SA framework: ‘<i>Maintain a dynamic, diverse and knowledge-based economy that excels in innovation with higher value, lower impact activities</i>’. It is still maintained that RSF objective 13 is not required as this is covered in RBWM SA objective 4.</p>
14. Maidenhead Civic Society	<p>Question 1: Broadly agree with PPPSIs. Should also reflect the importance of open space in urban design. Could also lead the way on eco-friendly development, not just comply.</p>	<p>Support noted. The PPPSI Review only seeks to summarise the keys aims of the PPPSIs and the LDF response.</p> <p>The PPPSI review makes several references to promoting sustainable construction and the DPDs will seek to do this. The Borough is also in the process of producing a Supplementary Planning Document on Sustainable Design and Construction.</p>

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	Question 2: Appears relevant.	Noted.
	<p>Question 3: Disappointed that there does not appear to be any specific reference to the importance of the River Thames as a natural, leisure and economic (tourism) asset, particularly as there was a specific policy for the river in the previous Core Strategy.</p> <p>For context: add “in line with national average” after ‘the number of older people is expected to increase’ and also after ‘the number of one-person households is increasing’ on page 13.</p> <p>It is anomalous to cite only Maidenhead as one of the preferred locations for future development.</p> <p>To accord better with the background papers and the facts, delete “possibly” from the sentence ‘Although relatively healthy, Maidenhead possibly has scope to improve its status’ on page 15.</p>	<p>Disagree. Section 3.3 under ‘Landscape’, reads <i>‘The River Thames Corridor is one of the borough’s most significant landscape features and has an important role in terms of providing leisure and tourist attractions’</i>.</p> <p>Agree. ‘In line with national average’ will be added to relevant sentence.</p> <p>Agree. In response to comments from other respondents, in section 3.3.1, under ‘housing’ the relevant bullet point will be amended to read <i>‘There will be a focus on Windsor and Maidenhead in relation to site allocations for housing’</i>.</p> <p>Agree. Reference will be deleted.</p>
	Question 4: Add: Ensure all new development enhances character and environment	Disagree. It is considered that these issues are already included in two SA objectives. SA objective 6 includes ‘ <i>distinctive communities</i> ’ and objective 11 9 renumbered 13) includes a reference to ‘ <i>high quality townscape</i> ’.