

## **Royal Borough of Windsor and Maidenhead Examination of the Borough Local Plan 2013-2033**

This Statement responds to the invitation in the letter dated 15<sup>th</sup> September 2020, from Banks Solutions, to comment on the Council's response (RBWM 026) to the Inspector's question to the Council, dated 13<sup>th</sup> July 2020, concerning household projections.

It is written on behalf of the following Organisations (The 13 Organisations):

Ascot, Sunninghill and Sunningdale Neighbourhood Plan Delivery Group

Bray Parish Council

Bray Neighbourhood Plan Steering Group

Braywick Action Group for Maidenhead's Greenbelt

Fisheries Residents Association

Horton Parish Council

Oakley Green & Fifield Residents Association

Old Windsor Parish Council

Old Windsor Neighbourhood Plan

RBWM Residents Action Group

Rushington Area Residents Association

Society for the Protection of Ascot & Environs

SportsAble

**In summary, the 13 Organisations disagree with the Council's conclusions, and invite the Inspector to agree that 2018-based household projections do represent a meaningful change in the housing situation that should inform the BLPSV and the PCP.**

In support of our view, we draw attention to Table 1 of the Council's document at Paragraph 19, on page 4. Whichever way it is read, it clearly and conclusively shows a downward trend in both population and household growth, comparing the figures derived from 2012-based projections with those derived from the most recent projections, which are 2018-based. The council itself describes the table as illustrating "a significant decline in household growth" (paragraph 20) and "a significant reduction in projected population growth". The Council has chosen correctly to use the word "significant", rather than "minor" or "slight".

We have not challenged the OAHN figure of 14,240 dwellings, but in our response to Matter 3, Issue 2 (Inspector's MIQs) we argue that it is not necessary to achieve 100% of OAHN if it involves developing Green Belt land. Of course the Council's

published documents indicate a revised Housing Supply Position of 16,435 dwellings, an increase of 15.4% over the number produced by the OAHN.

More recently, in answer to the Inspector's MIQs, the Council belatedly altered the housing supply figure to 15,816 because of "a double counting error". We consider that this remains an unwarranted increase over the 100% of OAHN, and that the change illustrated in Table 1 of the Council's statement serves only to support a significant reduction in housing supply during the Plan period.

Such a reduction would not render the Plan unsound, and indeed it would render it more effective and more acceptable to local residents and organisations who query the need for an unrealistic increase in housing numbers. It would enable the Council, and the Inspector, to reconsider the alleged need for large releases of Green Belt land. It would also reduce the necessity for schemes to be promoted, via the Plan, which require the provision of expensive infrastructure which at the present time is neither properly planned for, nor funded. A reduction in housing numbers would potentially ease the problems of traffic congestion and air pollution which we describe in our evidence to the Examination.

The Council suggest, at paragraph 40, that the additional (and as we argue, unnecessary) housing, including that on Green Belt land, can be allocated as some sort of buffer allowing for more housing beyond the Plan period. We argue that unnecessary release of Green Belt and over-provision of housing generally are not justifiable simply to act as a buffer - an allocation is an allocation - and that the Inspector should direct that the Council embarks upon a proper Review of the Plan, with proper public engagement, in order to consider needs beyond 2033.

Our fundamental objections to the unnecessary allocation of Green Belt land for housing are supported by the recent High Court decision *Aireborough Neighbourhood Development Forum v Leeds City Council*, Case Number: CO/3279/2019, where a judge ruled that proposals in a Leeds City Council development plan for the deallocation of several Green Belt sites to allow the building of 4,070 new homes should be reconsidered by the Planning Inspectorate. The judge ruled that a "proper justification" had yet to be put forward for releasing green belt for development, and that there was "no clear explanation" of any exceptional circumstances justifying the level of green belt releases. The judge considered that "the loss of a significant quantum of green belt land ... was not properly justified in terms of national policy".

We consider that there is a direct parallel between this important ruling and the current consideration of the RBWM BLP, and will hope to pursue this point, before the Inspector, at the Examination hearing.

The Council also suggests in paragraph 40 that the additional housing "could contribute toward the unmet housing needs of Slough Borough". This is a great surprise, as the Council's response to the Inspector's MIQs (Matter 3, Issue 1, Question 3) appears to completely rule out any suggestion of meeting Slough's unmet housing needs as part of this Plan.

We note with interest that the Council's Lead Member for Planning and Environmental Services, Councillor David Coppinger, made it clear in the "Maidenhead Advertiser" of 18<sup>th</sup> September 2020 that he had not read document RBWM 026. We are unable to trace any consideration of this Document by the Council at any meeting of Councillors prior to its publication, and without the input of the relevant Cabinet Member, we wonder whether this Document represents the considered views of the Council. We are urged in paragraph 12 of the same Document to ensure that "confidence in the planning system and the local planning authority" are not undermined, but we find this difficult when the lead Cabinet Member for the BLP is unable publicly to support statements in a key Examination document.

The concluding paragraphs of the Council's document suggest that the Inspector should agree that the evidence base before the Examination "must include identifying a base date and stick[ing] to it". Our view is that to stick to projections which are 8 years old and which are demonstrably inaccurate is not a sound way of proceeding to make a holistic and sustainable Local Plan, and that this approach reflects an over-riding desire to "get the Plan done", rather than to consider what is best for the Borough at a time of great change.

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**September 2020**