

Briefing notes for local residents wishing to respond to the RBWM Reg 19 Borough Local Plan Consultation

Save Cookham has provided these Briefing Notes which set out our views on this current Borough Local Plan Submission Version (Proposed Changes version Oct 2019). Anybody who would like to respond to the consultation on this Plan is welcome to use any of these notes to help them prepare their submission.

As Cookham residents, we recognise the importance of the Borough having an up to date Borough Local Plan, against which new planning applications can be determined. We agree we need more housing, especially homes that lower income families can afford – for key workers like teachers and care and hospital workers. **However, there is not the appropriate infrastructure in place for development of this scale in Cookham.**

In order to be successful, we need a Plan that includes a vision for our Borough, for Maidenhead and for our village, and that is infrastructure rich to support this and any future developments. This Borough Local Plan fails to deliver on these key points and therefore we are strongly against it.

It has been produced by the Borough without proper consultation and engagement with local communities and contrary to all the principles of Localism.

Background to the Borough Local Plan:

In Sept 2017 a public consultation was opened on the RBWM Borough Local Plan (BLP) , following the public and communities consultation input. This was then submitted by RBWM to be inspected in Jan 2018. Certain parties/individuals were invited to the examination held in Jun 2018 to consult with the independent examiner on their points.

Before the Inspector reached stage 2 of the process, she called a halt on the proposals due to some major issues highlighted in the plan. As a result of these interruptions, some of the detailed evidence and consultation arguments were therefore not heard. It is this Jan 18 plan that is to be re-inspected.

In an attempt to redress the major issues with the Jan 18 plan, RBWM produced a revised plan (Proposed Changes to the Jan 18 plan) in October 2019. This revision has made major changes to the Jan 18 plan.

Due to the adaptations made to the plan , a new public consultation was opened for comments. This consultation closes on 15th Dec 2019.

If you did not submit a consultation response previously, then you cannot now comment on that plan. **However**, if you did previously comment and would like to add to them, it is on the proposed changes that you must now comment not the original details. We will highlight the additions below for everyone to have their say on.

There is a formal online form to complete to make an official comment. It must be completed accurately or won't count, but our guidance is offered at the end of this document in the "How to present your comments" section.

HOW TO PRESENT YOUR COMMENTS

Apart from the additional traffic and transport congestion through Cookham there is not anything of real substance in the proposed changes document that can be commented on as affecting Cookham directly.

However, there are grounds for change and objection when you go into the detail. The proposed changes plan is supported by a host of documents that underpin it and one is critical and gives fundamental reasons for objecting.

Submitting by form

It is regretful that the Borough have not simplified the process for local residents to respond to this consultation. In our view, both the online portal and the representation form are extremely difficult to use. We suggest the easiest way for you to prepare your submission via the [form](#), which you then email or post to the Borough.

Send via email to: blp@rbwm.gov.uk

Or via post to: FREEPOST RBWM PLANNING POLICY

How to fill out your representations form:

Download your form from

<https://rbwm.objective.co.uk/file/5513840>

The sections are:

Part A - Your Contact details

Any contact details required (you will not be contacted unless you select to be so)

Part B - Your Representation

You can make multiple representation on any part of the plan, and submit multiple forms, referencing any part with changes (read the full [BLP here](#))

The reference input below relate to 7.4 housing development sites:

3.	To which part of the Proposed Changes to the Borough Local Plan Submission Version does this representation relate?				
Paragraph	7.4	Policy	HO1	Policies Map	

On a consultation, you can only object on two grounds. Is it “**legal**” or is it “**Sound**”

LEGALITY -There is less cause for the call of an illegal plan, and it would your response would need to be detailed enough to stand up, but it’s is possible that, for example, RBWM Legal Duty to Co-operate with Wycombe Council has been breached (see “Bourne End development" further down)

SOUNDNESS -We need to demonstrate why the plan is unsound by reference to one or more of the soundness criteria. Soundness can be measured against 4 elements (read more [here](#)), however two of these are based on whether the planned changes are **sustainable** (meaning will the changes compromise future generations)

It is on the argument of sustainability and therefore soundness on which the best case is made.

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	Optional
4.2	Sound	Yes		No	X

Therefore after ticking the box for soundness the first line in your objection should read something along the lines

“I object to the Proposed Changes to the Borough Local Plan Submission Version (Oct 2019) on the grounds that the planned sites for Cookham (AL36, AL37 and AL38) lead to an unsustainable situation and therefore is unsound” .

In short, the argument proposed here is that any further substantial building in Cookham, such as proposed in the plan, not only makes it unsustainable for future generations but makes it unsustainable for this generation too and therefore is unsound and should be removed from the plan.

*You will be then asked to give your reasons. **It is important that you paraphrase the points laid out in the notes below**, simply copy and pasting will not have any affect and may be disregarded:*

- *Find the points you want to make,*
- *Mix up the order of them*
- *Maybe replace “we” with “I”*

Try and make it as factual, succinct and bullet pointed as you can **the more we speak out, the more they will listen.**

5.	<p>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.</p> <p>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.</p> <p>(Continue on separate sheet/expand box if necessary)</p>				
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In the next section you will be asked for recommended changes. A suggestion is

1. **Remove the 3 allocated sites in Cookham.**
2. **Consider re-adopting the site HA42 IN Datchet which is only 7 minutes from the hospital. Mitigation on Flooding can be made as it is less flood-able than other sites within the plan.**

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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You may decide not to want to participate in the hearings and if so a NO in the next section is required.

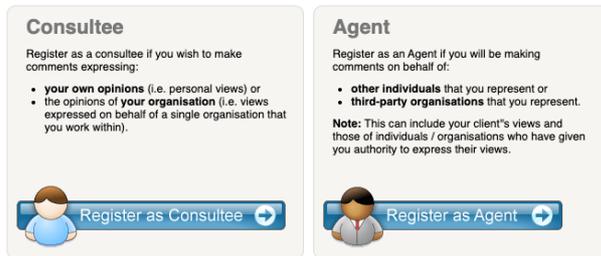
7.	<p>If your representation is seeking a modification, do you consider it necessary to participate at the examination hearings stage when it resumes?</p>
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Please note: Although there is an option, sending a letter is not the best approach because RBWM are not obliged to take these into account nor pass it on to the inspector. A letter of objection would be best directed at the landowners as it is their decision to put the land up for development that enables it to be included in the plan.

Submitting Online

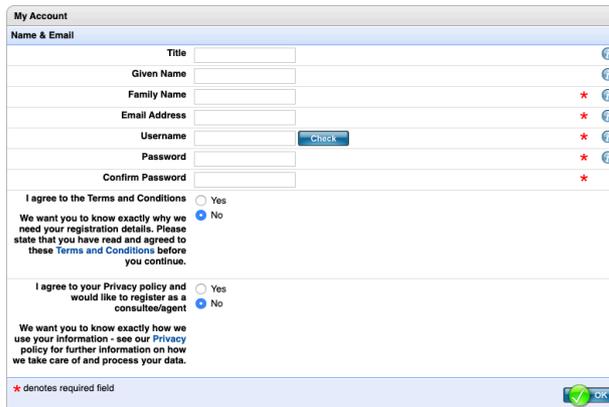
It is also helpful to submit on comments on the RBWM online portal, to do this you simply need to visit any of the links below.

You will need to register in order to comment, simply visit:
<http://consult.rbwm.gov.uk/common/register.jsp>



The image shows two registration options side-by-side. On the left is the 'Consultee' option, which includes a description of what a consultee is and a 'Register as Consultee' button with a right-pointing arrow. On the right is the 'Agent' option, which includes a description of what an agent is and a 'Register as Agent' button with a right-pointing arrow. Both options feature a small icon of a person's head and shoulders.

Select 'consultee'



The image shows a 'My Account' registration form. It has several input fields: Title, Given Name, Family Name, Email Address, Username (with a 'check' button), Password, and Confirm Password. There are also three sections of radio button questions: 'I agree to the Terms and Conditions', 'I agree to your Privacy policy and would like to register as a consultee/agent', and 'We want you to know exactly how we use your information'. A legend at the bottom left states '* denotes required field'. An 'OK' button is at the bottom right.

Enter your details

Now you can click on one of these links below to be directed to the right page to comment.

Housing Development Sites - You can comment on all Cookham sites here:
<http://consult.rbwm.gov.uk/portal/blp/blpsv-pc/blpsv-pc-oct19?pointId=s1559580199243>

Individual sites:

AL37 Land at Lower Mount Farm (200 homes)

<http://consult.rbwm.gov.uk/portal/blp/blpsv-pc/blpsv-pc-oct19?pointId=s1559580199397>

AL38 land east of Strande Park (20 homes)

<http://consult.rbwm.gov.uk/portal/blp/blpsv-pc/blpsv-pc-oct19?pointId=s1559580199396>

AL36 the Gas-holder site (50 homes)

<http://consult.rbwm.gov.uk/portal/blp/blpsv-pc/blpsv-pc-oct19?pointId=s1559580199395>

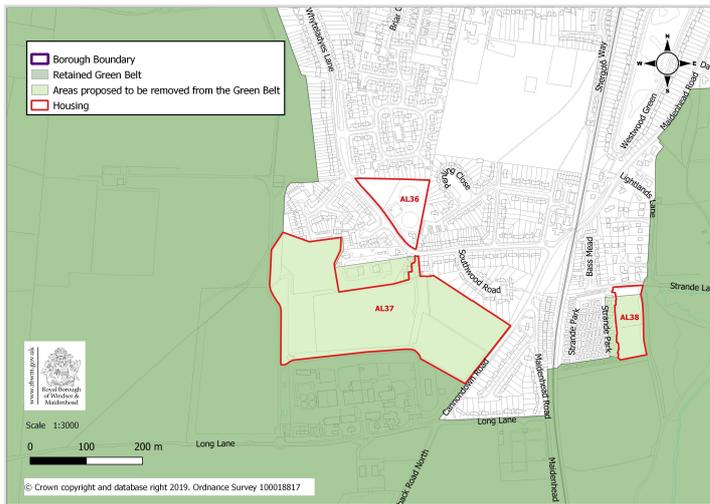
You will be asked the same questions when commenting online as to the above downloadable form.

OBJECTION POINTS

The proposed Cookham sites:

The three sites designated in Cookham (Lower Mount Farm (site AL37), Gas holder Whiteladies Lane (site AL36) and Strande Parke (site AL38)) have not been changed in this latest version of the BLP.

However the total number of homes have now been increased from 260 to 270. (The additional homes arising from an increase in number on the gas holder site AL36)



Cookham Sites AL37 AL38 AL39

A disproportionate growth in Cookham

The effect of including the proposed sites would be to increase Cookham's housing stock by over 10%. The new plan specifically stated that major new developments should take place in the three designated sites of Maidenhead, Windsor and Ascot, and it is therefore contrary to all principles and policies of the Borough Local Plan to proportionally load so much onto a community in the Green belt.

Additional dwellings affecting Cookham - Spencer's Farm

There is an additional change to allocated land along Switchback Road near Maidenhead, known as Spencers Farm (AL25). This has changed to increase dwelling numbers from 300 to 330 (on a smaller plot.) This will undoubtedly affect Cookham due to traffic and services.



Spencers Farm AL25.

TRAFFIC

As stated in the plan; “The Borough has high car usage and ownership, partially due to the rural nature of some settlements where regular public transport services are not viable, and also as a result of the area being relatively affluent. Car ownership was 86.7% at the 2011 Census” (Paragraph 3.6.6) Due to the remote nature of Cookham, it would be foolish to expect residents to not use vehicles and turn to alternative transport, with narrow streets and low bridges, buses are already limited.”

The background data provided in a supplementary document, “Strategic Highways Model Oct 19”, indicates some potentially alarming effects on the traffic flow in Cookham village during peak times.3.6.6

540% Increase in travel times

Even with the buildings already built in the Borough since 2016 and committed, the travel time figures from the Council at peak, from Cookham High Street to Cookham Bridge increases 320% from a base line.

With the additional sites proposed in the BLP, this increases to 540% from baseline. This increase is based on taking the assumption of just 10 extra cars per hour as stated by the document. It is not realistic to suggest that from 600 new dwellings in our local area (Cookham and Spencer’s Farm) that there will not be more than 10 additional cars using this route on a daily basis and therefore it is likely that the effect would be much worse than the stated 540% increase.

No cross-county liaising

The transport infrastructure plan affecting these sites is unlawful and unsound due to there being **no reference to consultation with Wycombe District Council** (WDC) relating to development and new highways proposals north of the Thames, failing to check traffic forecasts and share both volumes and outcomes during the consultation period. WDC has now approved 650 houses in Bourne End on the other side of Cookham Bridge. When the original RBWM Plan was submitted these houses were still in the proposal stage.

Cookham has single pass and one way streets

Due to existing narrow streets and the ‘bottle neck’ nature of Cookham, the traffic levels during high volume periods (such as rush hour) are already high in certain areas and further development would only escalate this to an epidemic level.

The transport infrastructure plan affecting these sites does not provide for extra road and public transport infrastructure especially at known traffic problem areas, Cookham Bridge, Cookham Pound, and Cannondown Bridge, as well as proposing extra traffic and buses along the congested Lower road. As we know, The Pound and The High Street in Cookham are essentially gridlocked now at peak travel times. We need to emphasise that The railway Bridge, The Pound, The High Street and the river bridge are essentially **one way traffic points with no alternative solutions.**

Historical listed Bridge

Cookham Bridge dates from 1867 and is listed. **There is no alternative crossing of the Thames in this corner of Berkshire** apart from Marlow Bridge (Bisham Rd), which is also listed and single passing. The relevant road in Cookham, the A4094, leads from the Bridge into the Cookham Conservation Area. The

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 a heavy increase in traffic.

Danger to residents and Child safety

The Pound (within Cookham Village conservation area) is a thoroughfare for both Cookham Rise and Holy Trinity school children, and is also where Lorries and buses are regularly required to mount the pavement to pass (which at its narrowest is 19 Inches). The proposed transport plan for Cookham is to increase bus transport which is not viable in the Village and creates an **increased danger to children, pedestrians and cyclists.**

AIR QUALITY

Over the limit of legal pollutants

The air pollution policy states 'Development proposals should aim to contribute to conserving and enhancing the natural and local environment, by avoiding putting new or existing occupiers at risk of harm from unacceptable levels of air quality.' (EP2.3)

There has been no proposal or plan on how to mitigate traffic pollution levels within Cookham. Arguably, the construction of a further 270 houses would yield an extra 400+ vehicles that cannot be guaranteed to use green renewable sources and will add to the already high levels of dangerous pollutants within the village.

Furthermore, no air quality assessment has been made for Cookham within the plans relevant document. Due to the narrow streets of the High Street (B4447) and The Pound this increased volume of traffic would create a dense fume zone.

It is likely that the pollutants already existing are many times over the legal limit in these areas of Cookham and more static vehicles through congestion would make this worse.

GROWTH OPPORTUNITIES

A lack of employment opportunities

As a small village there is little commercial and retail growth opportunities in Cookham available due to lack of commercial space. There is an existing lack of employment opportunities available to support extra residents and as a result will not offer employment opportunity.

EMERGENCY A&E ACCESS

No access to emergency medical care

In the 2018 plan it stated that 99% of residents cannot get to A&E IN LESS THAN 30 MINS. (Paragraph 3.4.7) Yet the fact only 1% can access Wexham Park Hospital in this time has been removed in the changes. **You cannot make A&E from Cookham in under 30 minutes**, and in rush hour it is more like 45-50 Mins. This needs to be highlighted.

The addition of more homes brings with it more traffic which means the time taken to access emergency medical care will increase for residents and the emergency services. Sites such as the Datchet (HA42) were removed in the

revised plan, due to flood risk, as is Cookham, yet it is nearer the hospital and amenities. Why is this?

Cookham Medical centre

With a long waiting list and large population of elderly residents already, **the demand placed upon Cookham medical centre (which is the only primary care facility in Cookham) will be stretched** and will potentially not be sufficient to support a 10% growth in Cookham's resident number.

GREENBELT

The renumbering within the SP1 (Spatial Strategy) policy of the plan means you can take the opportunity to object against the way in which development sites have been selected for inclusion. In particular, the sites earmarked to come out of Green Belt (AL38, AL37).

Developing of Brownfield sites

The plan states "The villages excluded from the Green Belt will continue in their roles as local centres as well as providing limited opportunity to accommodate new development. This will largely be achieved through the redevelopment of existing brownfield sites within the villages alongside limited Green Belt release" (SP1.8) We agree with this.

We want to see evidence that the Borough has fully explored all possible brownfield sites or other alternatives before deciding to allocate these sites in the Green Belt. This is because these were being promoted by landowners and developers and by the Borough themselves in some instances.

Improper selection of sites

There has been a lack of transparency from RBWM over why some sites have been chosen over others and the decision as to why others have been left out. In addition to this, some sites were consulted on and some were not. That fact that some sites which were consulted on have since had their geographical boundaries expanded beyond those in the earlier consultations has also never been fully explained.

Borough already on target for delivery

The BLP proposes 14,240 new dwellings for the plan period March 2013 to March 2033. The 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.

RBWM are now projecting a yield of 16,435 dwellings, i.e. a surplus against requirement of 2,195 homes. The allocations in the table (Paragraph 7.2) on housing should read 7,671 and the total should read: 16,215.

For this reason, and **the over delivery of target dwellings there seems little reason for land in Cookham's Green Belt to be taken** to meet a need which does not appear to exist.

Protecting a Green infrastructure

Contrary to the new Open Space policy (IF4.2a), the proposed sites of Strande Park (AL38) and Lower Mount Farm (AL37) does in fact offer a huge amount of biodiversity in Cookham. Not only as a strong green network across Cookham, but also home to less common wildlife such as bats, badgers, mice, deer and wild birds. **The proposed developments therefore directly contradict the Spatial Vision objective (4.3-1-iv) to “Protect and enhance biodiversity within the Borough”**

Greenbelt Infilling

The Lower Mount Farm site (AL37) has been falsely presented as infill of Greenbelt. This is contrary to new Policy QP5.3 “Limited infilling may be appropriate outside identified settlement boundaries where it can be demonstrated that the site can be considered as falling within the village envelope...”

In fact, the encroaching spread of buildings that house farming and industrial use on the Lower Mount farm site to the south, is still sufficiently wide and their relative mass sufficiently light, that development on **this site would not in fact be infill but plainly a substantial new development in the Green Belt**, contributing to closure of the green gap between Cookham and Maidenhead, contrary to numerous policies in the new Plan.

FLOOD PLAIN

Strande park on flood plain

One allocation, **Strand Park**, is part in the **1 in 100 flood plain** and cannot adequately be mitigated by any proposed developments, and therefore The site does not meet the criteria in the new Plan or Policy IF4.2

Cookham in flood

Further Flood plain assessment only covers dwellings. owever in 2014 all roads (3) to Cookham village were underwater and impassable for 10 days under 3ft of water, essentially turning the village to an island. **With flooding comes limited access** and with increased flood warnings this would put a strain on traffic in the local area when it occurs again

Other things that have not changed on this version of the planbut are worth including in your submission:

HISTORICAL CONTEXT

Both cultural and historical context damage are considered in plan representations. Gridlocking the village damages and deteriorates these factors of Cookham which go against the plans policies of the Spatial vision (4.3iii) “The objective should be to protect the special qualities of the built environment including heritage assets.” and the Character and Design policy (QP3- 1b) “A development proposal will be considered high quality design and acceptable where it ...Respects and enhances the local, natural or historic character of the environment”

Cookham has arguably far more historical significance, ancient and recent, than anywhere in the Borough

Bronze age and Roman

Bronze age discoveries have been made in Cookham Village. Saches Island, next to Cookham Bridge, was a Roman Fort and a Palace of the Kings as recent as the 11th Century and represented the last deep water navigation on the Thames.

Royal Village

A Council of State was held in Cookham in AD 997 by Ethelred the Unready and was designated a Royal Manor at this time. This occurred approximately 100 years before Windsor Castle was built, indicating that the Royal Borough designation really owes that to Cookham and not Windsor on an historical basis.

Doomsday Book

The Domesday Book records the value of Cookham in 1066 at £50 and that of Windsor only £15, highlighting its importance historically.

Historical Church

Holy Trinity Church next to the bridge entrance contains almost 1400 years of history.

The invention of radio

More recent history shows that Guglielmo Marconi most likely carried out fundamental experiments of radio transmission from his Uncle's house on Whyteladies Lane (very close to the site of major Green Belt re designation AL37 and a natural thoroughfare.) It is possible, and currently being investigated, that the first ever transmission of radio over water took place over the Thames at Cookham; meaning one of the world's greatest inventions (Scientific American) may well have been developed in Cookham.

Stanley Spencer

Stanley Spencer, heralded as one of this country's finest 20th Century painters, hails from Cookham Village. His house and gallery (in the Conservation Area) are already surrounded by queuing traffic for the bridge.

Please share this information with others who may be affected by the proposed changes. It is important that we have as many people speak up to make a difference. For more information, visit savecookham.com