## **TAPLOW PARISH COUNCIL**







# Hitcham and Taplow Society

Village Centre, High Street, Taplow SL6 0EX

Sir Michael Lyons Chairman, New Towns Task Force Ministry of Housing, Communities and Local Government 2 Marsham Street London SW1P 4DF

7 May 2025

Dear Sir Michael,

## Re: New Town Proposal at Taplow, South Buckinghamshire

You may be aware that the UKDAYONE think tank recently published an article on requirements for New Towns, including an addendum proposing a New Town at Taplow for "over 20,000 homes" (<a href="https://ukdayone.org/briefings/new-towns-for-a-new-generation">https://ukdayone.org/briefings/new-towns-for-a-new-generation</a>). We assume this proposal has been submitted to your Task Force as one of the more than one hundred proposals you have received.

Having reviewed the New Towns Task Force Interim Report (February 2025), we wish to highlight how Taplow fails to meet virtually all of the Task Force's established principles for successful new towns. While we appreciate your due diligence process, we note with concern that the UKDAYONE paper authors had not actually visited Taplow when preparing their report, leading to significant oversights regarding the site's suitability.

Our analysis identifies several critical constraints that render Taplow fundamentally unsuitable for New Town development. These are not matters of local preference but represent significant physical, environmental, and infrastructure barriers that directly conflict with the Task Force's principles and the recent National Planning Policy Framework (NPPF).

## 1. Physical Division – Inconsistent with the New Town Task Force's 'Well-Connected' and 'Balanced Communities' Principles

The proposed area is bisected by both the Great Western Railway line and the A4 trunk road, creating a physical and psychological division, in parts several hundred metres wide. This division directly contradicts the Task Force's principles of creating 'balanced communities' and 'well-connected' places where residents can 'walk to local amenities.'

Evidence from comparable communities demonstrates the persistent challenges such divisions create:

- In Slough, despite decades of development, the same Great Western Railway continues to mark a lasting north-south divide, with property values averaging 15% lower south of the railway.
- Didcot has spent £8.5 million on crossing infrastructure yet still struggles with community division.
- Research from University College London shows that major transport barriers reduce cross-corridor pedestrian movement by 40-60%.

These constraints would necessitate:

- Multiple pedestrian/cycle crossings at £1.5-3.5 million each
- Vehicle crossing points at £5-8 million each
- Duplicate community facilities on both sides of the barrier, increasing capital costs by 15-25%

This division also violates NPPF paragraph 96(a), which requires planning policies to "promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other."

This point is expanded upon and further evidenced in Appendix A.

## 2. Flood Risk and Geological Constraints – Inconsistent with the New Town Task Force's 'Environmental Sustainability' Principle

The land south of the A4, comprising approximately 15% of the proposed development area, is classified by the Environment Agency as Flood Risk Area 3 (the highest risk category). Climate change projections from the UK Climate Projections 2018 indicate a 10-30% increase in winter precipitation for the region, intensifying flood risks.

This area also contains significant sand and gravel deposits identified in Buckinghamshire Council's Minerals and Waste Local Plan 2016-2036, creating a planning dilemma: either build over strategic mineral resources (contrary to resource management policy) or extract them first, which would exacerbate flood risk by lowering land levels. Such extraction would weigh against the aim of "accelerated delivery" of housing.

These constraints fundamentally undermine the Task Force's principles of 'environmental sustainability' and 'climate resilience,' and directly conflict with NPPF paragraph 172, which requires a sequential, risk-based approach to development location.

In addition, there are also growing challenges in obtaining flood insurance.

This point is expanded upon and further evidenced in Appendix B.

#### 3. Heritage Assets - Inconsistent with the New Town Task Force's 'Vision Led' Principle

The Taplow area contains an exceptional concentration of heritage assets of national significance:

- Cliveden Estate (Grade I listed house and registered historic park)
- Taplow Court (significant historical connection to the modern Olympic movement)
- Taeppa's Mound (second most significant Anglo-Saxon burial site in the country)
- Dorney Court (Grade I listed medieval manor house)

Taplow contains approximately 76 listed building entries within the proposed development area and immediate surroundings.

These heritage constraints would:

- Reduce developable area by a significant amount due to required buffer zones
- Severely limit infrastructure routing options
- Fundamentally fragment any coherent New Town layout

These constraints directly conflict with the Task Force's principle for establishing 'a clear long-term vision with a distinct identity' and the NPPF Paragraph 8(b) creating places that are 'well-designed and beautiful.'

This point is expanded upon and further evidenced in Appendix C.

## 4. Special Area of Conservation - Inconsistent with the New Town Task Force's 'Environmental Sustainability' Principle

The entire development area falls within the Burnham Beeches Special Area of Conservation 5.6km buffer zone. This internationally protected site presents significant constraints:

- Burnham Beeches (Corporation of London) and Cliveden (National Trust) already receive 700,000 annual visitors annually, straining these sensitive environments
- Formal mitigation agreements exist between the Corporation of London and local authorities specifically to manage population impact
- The area forms an essential wildlife corridor between Cliveden and Colne Valley Regional Park

Development would require extensive and costly mitigation measures under the Conservation of Habitats and Species Regulations. This directly conflicts with the Task Force's 'environmental sustainability' principle and would create legal vulnerability for any development proposal. Natural England's standing advice requires specific protection for such internationally designated sites, making the development highly problematic from a legal compliance perspective.

The SAMMS (Strategic Access Management and Mitigation Scheme) costs for Burnham Beeches could add upwards of £40m to development costs.

This point is expanded on and further evidenced in Appendix C.

## 5. Community Opinion and Existing Growth - Inconsistent with the New Town Task Force's 'Vision Led' and 'Community Engagement' Principles

Taplow-wide consultations conducted in April 2025 showed 100% opposition to the New Town proposal. This unanimous local opposition directly challenges the Task Force's principle that new towns should be 'places residents are proud to call home.'

Importantly, local opposition is not to development per se, but based on specific constraints detailed throughout this letter:

- The population of Taplow has increased by 50% in the last twenty years through organic, sensitively designed building and is still growing
- The Riverside Taplow, Mill Lane development (approximately 220 homes) received the Buckinghamshire Design Award in 2023
- This demonstrates a balanced approach to meeting housing needs while preserving local character

This point is expanded on and further evidenced in Appendix C.

## 6. Green Belt Function - Inconsistent with the New Town Task Force's Site Selection Objectives

The Taplow Green Belt serves a critical strategic function in preventing the coalescence of Maidenhead and Slough. The current separation is approximately 3.5km, and development at Taplow would effectively create an unbroken urban area between these settlements.

This contradicts the Task Force's guidance that 'location selection for new towns should be strategically rational,' as stated in their Interim Report's 'Lessons Learned' section and conflicts with NPPF paragraph 143(b), which identifies preventing neighbouring towns from merging as a key purpose of Green Belt land.

This point is expanded on and further evidenced in Appendix C.

## 7. Infrastructure Viability - Inconsistent with the New Town Task Force's Aim to 'Accelerate Housing Delivery'

The combined constraints would necessitate extraordinary engineering measures and infrastructure investments:

- Extensive land raising requiring hundreds of thousands of cubic meters of fill, equivalent to thousands of large truck deliveries
- Very extensive engineering works south of the A4 whatever choices are made, including land raising, specialised foundations, sophisticated drainage systems, and flood compensation areas
- Re-engineering of the A4 including elimination of bottlenecks at A4 Railway Bridge and Maidenhead Bridge

The Building Cost Information Service estimates a 25-35% premium for construction in high flood risk areas. These exceptional costs would significantly undermine economic viability and reduce resources available for community benefits and affordable housing, directly conflicting with the Task Force's stated aim of 'accelerating housing delivery through the provision of new homes that people need,' as outlined in the Interim Report's 'Aims of the new towns programme.

This point is expanded upon and further evidenced in Appendix A.

#### Conclusion

While we recognise the pressing need for new housing, the specific physical, environmental, and infrastructure constraints at Taplow present exceptional challenges that cannot be feasibly or sustainably overcome. These constraints would prevent Taplow from fulfilling virtually all of the Task Force's established principles, objectives and aims for successful new towns.

We would welcome the opportunity to provide additional information. The attached appendices provide supporting evidence and detailed analysis of the constraints outlined in this letter.

Thank you for your consideration.

In the interests of transparency and good governance, all three Parish Councils and the Society will be publishing this letter and appendices on our respective websites following submission.

Yours sincerely,

Cllr. Karen Walsh (SIGNED) Chair, Taplow Parish Council

Cllr. Marie Hammon (SIGNED) Chair, Burnham Parish Council

Cllr. Jill Dax (SIGNED) Chair, Dorney Parish Council

Roger Worthington (SIGNED) Chair, Hitcham and Taplow Society

#### cc:

Joy Morrissey M.P. Beaconsfield

#### **Buckinghamshire Council:**

Leader

Cabinet Member for Planning and Regeneration

Rachel Shimmin Chief Executive

Stephen Bambrick Corporate Director Planning, Growth and Sustainability

#### **Burnham Ward Councillors:**

Kirsten Ashman Cole Caesar Paul Kelly

#### **General References:**

New Towns Task Force Terms of Reference New Towns Task Force "Building New Towns for the Future" Interim Report (Feb 25) National Planning Policy Framework (NPPF)

## **Appendices**

- Appendix A: Transport Infrastructure Impact Analysis
- Appendix B: Flood Risk and Geological Assessment with Maps
- Appendix C: Heritage Assets and Environmental Constraints

## **Appendix A: Transport Infrastructure Impact Analysis**

#### 1. Physical Division Effects

#### 1.1 Infrastructure Barrier

The proposed Taplow New Town area is bisected by two major transport corridors:

- The Great Western Railway main line
- The A4 Bath Road (a principal east-west road)

These infrastructure elements create a physical barrier, in parts several hundred metres wide, that completely divides the proposed development area (Network Rail et al., 2021). The railway embankment creates both a physical and visual barrier that would permanently divide any new community. This greatly exacerbates connectivity problems arising from the elongated shape of the proposed New Town, directly contradicting the Taskforce's principle that new towns should be "well-connected" with environments where "residents can walk to local amenities."

#### 1.2 Existing Development Patterns

Current patterns in Taplow demonstrate the powerful dividing effect:

- North of the railway/A4: Contains Taplow village centre, community facilities, and most residential development plus a small urban area adjacent to Maidenhead Bridge
- South of the railway/A4: Limited to two strip developments along Marsh Lane and River Road
- The existing shopping facilities are trapped between the railway and the A4, offering no possibility of organic expansion

This pattern has persisted despite 150 years of development opportunity, highlighting how difficult it would be to create the "higher density" development the Taskforce envisions where residents can "walk to local amenities" and "relax in shared, inclusive, open green spaces close to home."

#### 1.3 Movement Constraints Due to Physical Division

This division raises unique transport challenges that standard mitigation cannot resolve:

## **Railway Crossings**

The railway is elevated with crossings limited to three single-lane tunnels (two traffic-light controlled) built by Brunel over 250 years ago for farm traffic. These tunnels are very prone to flooding. Opening up free-flowing vehicle and pedestrian access would be extremely costly and disruptive, yet the railway would remain a visual and psychological barrier to creating a "balanced community."

## **A4 Crossings**

As the major east-west traffic artery, the A4 poses similar challenges. Subways and bridges are off-putting for pedestrians and cyclists, while surface crossings would cause serious traffic disruption. Creating such crossings would require:

- Multiple pedestrian/cycle crossings (bridges or underpasses) at costs ranging from £1.5-3.5 million each
- Vehicle crossing points with costs estimated at £5-8 million each (Chartered Institution of Highways & Transportation, 2021)
- Annual maintenance costs averaging £80,000-120,000 per structure

Even with these investments, the best efforts are likely to leave a town layout functionally divided in two, making it difficult to achieve the Taskforce's objectives for cohesive communities that "focus on building thriving communities" with shared access to amenities.

#### 1.4 Comparative Evidence

#### 1.4.1 Slough Case Study

Located east of the proposed site, Slough demonstrates the persistent divisive effect of the Great Western Railway:

- Slough's Indices of Multiple Deprivation data shows persistent socioeconomic differences between areas north and south of the railway (Ministry of Housing, Communities & Local Government, 2019)
- The Slough Borough Council Local Plan evidence base acknowledges the challenges of north-south connectivity across the railway (2022)

#### 1.4.2 Didcot Case Study

Didcot's expansion has been affected by the railway line cutting through its centre:

- The Didcot Garden Town Plan specifically addresses the challenge of overcoming the railway barrier (South Oxfordshire District Council, 2020)
- Infrastructure delivery plans estimate costs of £8.5 million for new crossing points (Oxfordshire County Council, 2021)
- Public consultation responses highlighted resident concerns about the divided nature of the community (*Didcot Town Council*, 2021)

### 1.4.3 Transportation Research Evidence

Academic research has examined the impacts of major transport infrastructure on community cohesion:

- A study in the Journal of Transport Geography found that major transport corridors significantly reduce cross-corridor pedestrian movement compared to areas without such barriers (Anciaes et al., 2016)
- Research from University College London's Centre for Transport Studies documented how infrastructure barriers contribute to social segregation in urban areas (Vaughan & Dhanani, 2020)
- The Transport for New Homes Project identified how major transport corridors create psychological barriers to community integration in new developments (2022)

## 1.4.4 Infrastructure Duplication Requirements

These comparable divided communities demonstrate the need for:

- Duplicate community facilities on both sides of the barrier
- Multiple primary schools to avoid children needing to cross barriers
- Additional emergency service provision
- The Building Cost Information Service estimates that this duplication typically increases capital expenditure by 15-25% above comparable non-divided developments (2023)

These requirements directly conflict with the Taskforce's goal to create "environmentally resilient places" with efficient infrastructure and sustainable design.

## 1.4.5 Emergency Response Implications

Analysis of emergency response data published by the National Fire Chiefs Council shows (2022):

- Response time increases in areas divided by major infrastructure
- Particular challenges for fire and ambulance services navigating limited crossing points
- These findings have implications for service planning in new developments and affect the Taskforce's "healthy and safe communities" principle

#### 2. East-West Travel Constraints

The A4 is the only available east-west road in Taplow. It is single carriageway and already seriously over capacity but faces very serious obstacles for expansion:

- To the east, queues to the Huntercombe Road junction and the M4 junction 7 regularly tail back half a mile to the Sainsbury roundabout at Lake End Road well outside rush hours
- To the west, similar queues form at Maidenhead Bridge over the Thames and the single lane roundabout on its western bank

Widening is limited by two bottlenecks that would be exceedingly costly and disruptive to overcome:

#### • Maidenhead Bridge over the River Thames:

The bridge is a single carriageway Grade I listed structure built in 1777. A second carriageway would be needed together with extensive reconstruction and demolition on both sides of the bridge

## • The Railway Bridge:

The railway crosses the A4 on a single carriageway wide bridge on a bend. Widening the tunnel would be a major engineering feat, both costly and very disruptive

• A third factor creating movement difficulties would be the need identified in section 1.3 for north-south crossings of the A4 for both pedestrian and vehicular traffic

These constraints directly undermine the Taskforce's vision for new towns to be places where "residents can take advantage of easier travel further afield."

#### 3. North-South Travel Limitations

While new roads would be built within the New Town, further north-south travel is very constrained:

- On the western side by Berry Hill/Cliveden Road which has significant pinch points within the Village Conservation Area
- On the eastern side, movement is constrained by the 6'6" restriction on Ship Hill, with Broad Lane being the only unrestricted northern route
- To reach the M40, commercial traffic must traverse Burnham and the Slough Trading Estate on the A4 to reach Farnham Road this is also the ambulance route to Wexham Hospital A&E for Maidenhead
- Traffic south must either use the A4 to junction 7 or go west across all of Maidenhead to reach the A308

These limitations would severely impact the Taskforce's goal for new towns to "support business creation, growth and employment opportunities" by constraining commercial connectivity.

## 4. Elizabeth Line Capacity Concerns

While Taplow has connections to London and Reading via its Elizabeth Line station:

- Transport for London's capacity analysis indicates peak-hour services are reaching design capacity in certain sections (2023)
- The Committee for London Transport Resilience projects significant additional passenger demand following the opening of Old Oak Common station (2022)

#### 5. Conclusion

The cumulative evidence from existing development patterns, comparable case studies, infrastructure requirements, and social cohesion research demonstrates that the physical division created by the Great Western Railway and the A4 represents a fundamental constraint to developing a cohesive, functional new town at Taplow (*Royal Town Planning Institute*, 2023).

These infrastructure constraints directly conflict with the Task Force's requirements for 'higher density' developments where residents can 'walk to local amenities' and 'take advantage of easier travel.' The unique combination of the railway embankment, A4 road, restricted Thames crossing, and limited north-south routes creates a set of constraints that cannot be feasibly or economically overcome.

This directly conflicts with the NPPF paragraph 8(b) social objective requiring development to foster "well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being."

The A4 is unable to service a New Town at its present capacity. Upgrading to meet the "well-connected" ambition of the Interim Report requires a major engineering project at very considerable cost, disruption and delay, conflicting in turn with the "accelerating housing delivery" ambition of the Task Force.

## Appendix B: Flood Risk and Geological Assessment

#### 1. Flood Risk Classification

#### 1.1 Environment Agency Designation

The land south of the A4, which constitutes approximately 15% of the proposed Taplow New Town area, is classified by the Environment Agency as Flood Risk Area 3 (the highest risk category) (Environment Agency, 2023). This designation indicates:

- A high probability of flooding (greater than 1 in 100 annual probability of river flooding)
- Land that is essential for conveying or storing flood water during significant flood events
- An area where development should be avoided according to the National Planning Policy Framework's sequential test



Flood Zones 2 and 3 south of Taplow Station and A4

## 1.2 Historical Flooding Context

The area has a well-documented history of significant flooding, directly relevant to the sequential test required by NPPF paragraphs 174-175:

- Records from the Thames Conservancy Board document the catastrophic flooding of 1947 and 1948 which inundated most of the proposed development area south of the A4 (Thames Water Authority Historical Archives, 2018)
- Environment Agency's Historic Flood Map confirms multiple flood events affecting the area over the past century (Environment Agency, 2022)
- The subsequent construction of the Jubilee Flood Relief Channel was specifically designed to alleviate this risk (but not remove it), as documented in the Thames Water Flood Alleviation Scheme Review (2020)

#### 1.3 Climate Change Projections

Environment Agency climate change projections indicate increasing flood risk in the Thames Valley:

- The UK Climate Projections 2018 (UKCP18) by the Met Office (2021) projects a 10-30% increase in winter precipitation for the region by the 2080s
- The Committee on Climate Change's Progress Report (2022) identifies the Thames Valley as a priority area for flood adaptation measures
- The Environment Agency's National Flood Risk Assessment (2022) indicates increased frequency and intensity of flooding events in the Thames catchment area

These climate change projections would compromise the Task Force's principle that new towns must 'support climate resilience' and be 'fit for the future.'

These climate change projections present additional concerns regarding the long-term insurability of properties in high flood risk areas. Insurers are increasingly withdrawing coverage from flood-prone zones as climate risks escalate. The Flood Re scheme, which currently provides a temporary solution for high-risk properties, has a limited lifespan and is set to end in 2039. As Henri de Castries, former Chairman of Axa, warned in 2015: 'A world at +2°C might still be insurable, but a world at 4°C would certainly no longer be insurable.' This growing insurance challenge would create significant long-term financial vulnerability for future residents of any development in Flood Zone 3 areas (SWEEP, 2023).

#### 2. Geological Constraints

#### 2.1 Mineral Resources

The Buckinghamshire Minerals and Waste Local Plan 2016-2036 (Buckinghamshire Council, 2022) identifies the area south of the A4 as containing significant sand and gravel deposits:

- The British Geological Survey's Mineral Resource Map for Buckinghamshire (2020) confirms substantial sand and gravel resources in the area
- The Plan designates portions of the site as a Mineral Safeguarding Area
- These deposits represent a strategically important mineral resource for the region
- It is uneconomical to transport such mineral resources long distances

#### 2.2 Extraction Dilemma

This mineral designation creates a significant planning policy dilemma that conflicts with NPPF paragraph 223(c) regarding mineral safeguarding:

## • Option 1: Build Over Mineral Resources

- o This would permanently sterilise strategic mineral resources
- o Contradicts national planning policy on mineral safeguarding
- o Creates potential future resource scarcity for the region
- Would likely face opposition from mineral planning authorities

## Option 2: Extract Minerals Before Development

- The Minerals Products Association (2021) documents that extraction typically lowers surface levels by 2-4 metres
- The British Geological Survey's Groundwater Vulnerability Maps (2021) indicate this would exacerbate flood risk
- Post-extraction development would face additional engineering challenges documented by the Institution of Civil Engineers (2023)

- Timeline Implications:
  - Mineral extraction would significantly delay any housing development by 5-10 years
  - This multi-year extraction process directly contradicts the Task Force's stated aim of "accelerating housing delivery through the provision of new homes"
  - The sequential process (extraction followed by development) would place this site at a significant timeline disadvantage compared to sites without mineral resources

#### 2.3 Evidence from Previous Extraction

Gravel has been extracted from the area north of the A4 since the time of construction of the M4 immediately to the south. This historical extraction provides clear evidence of the development challenges that follow:

- Location and Extent: Multiple sites across Taplow have undergone extraction, including:
- Land to the east of Boundary Road extending from the footpath south of Boundary Stables to the allotments
- Land to the west of Boundary Road
- Area north of Taplow station
- The recreation ground enclosed by Boundary Road, Station Road and Institute Road
- These extracted areas represent approximately 10% of the overall proposed development area
- **Persistent Issues**: These post-extraction sites demonstrate consistent problems:
  - Environment Agency records confirm persistent high water table and drainage issues
  - o Surface water flooding occurs regularly, even during moderate rainfall events
  - o Soil instability continues decades after extraction
- **Development Implications:** Site investigation reports commissioned by Buckinghamshire Council (Taplow Riverside Conservation Area Character Appraisal 2007) confirmed:
  - Unfavourable ground conditions for development
  - o Need for specialised foundation systems at significantly higher cost
  - o These areas will incur additional building costs to cope with these conditions

This extensive evidence from multiple extraction sites throughout Taplow demonstrates that post-extraction areas present long-term development challenges that significantly increase construction costs and maintenance requirements.

## 3. Engineering Implications and Costs

## 3.1 Required Engineering Measures

Addressing these combined flood and geological constraints would necessitate extraordinary engineering measures:

- The Institution of Civil Engineers' report "Building on Challenging Sites" (2023) outlines the extensive measures required for development in high flood risk areas
- The Construction Industry Research and Information Association's guide SuDS Manual C753 (2022) details the exceptional drainage requirements for developments in flood-prone areas

#### 3.2 Cost Implications

Engineering assessments for similar constrained sites indicate exceptional costs:

- The Building Cost Information Service's Special Foundations Cost Report (2023) documents a typical 25-35% premium for construction in high flood risk areas
- Homes England's Development Finance Calculator (2022) indicates that sites with combined flood risk and poor ground conditions typically face viability challenges
- The Royal Institution of Chartered Surveyors' Construction Cost Analysis (2023) provides benchmark data showing significant cost premiums for flood resilient construction

#### 3.3 Viability Impact

These extraordinary costs would have significant implications for development viability:

- Research from the National Housing Federation (2024) demonstrates how exceptional site costs impact affordable housing delivery
- The National Housing Federation's Development Economics Model (2023) quantifies how infrastructure costs affect overall scheme viability

#### 4. Environmental Impact

### 4.1 Wetland Ecosystems

The area south of the A4 contains valuable wetland ecosystems:

- Natural England's Priority Habitat Inventory (2023) identifies areas of wet woodland and floodplain grazing marsh
- The Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust surveys (2021) document protected species including water voles and great crested newts
- The UK Biodiversity Action Plan identifies these habitats as priority conservation targets (Joint Nature Conservation Committee, 2022)

### 4.2 Hydrological Functions

The existing landscape performs important hydrological functions:

- The Environment Agency's Working with Natural Processes Evidence Directory (2021) documents the flood attenuation value of natural floodplains
- The Chartered Institution of Water and Environmental Management's Natural Flood Management Guide (2022) quantifies the benefits of preserving natural hydrological features
- Provides important surface water drainage supporting the water table

#### **4.3 Water Resources Infrastructure**

Within the area there is the Taplow groundwater source, which is a line of five boreholes along the eastern bank of the Jubilee River north of Mill Lane. This groundwater source sends water to the Dorney Water Treatment Works (WTW), located to the south of the A4 (opposite Tesco's). The assets and associated infrastructure that link the groundwater source to the WTW would need to be protected, and access would need to be maintained for both planned and unplanned activities. (*Thames Water FOI Response, April 2025*) This area also acts as the catchment area for the water extraction. Loss of the catchment area would be problematic.

This critical water infrastructure represents an additional development constraint that would:

- Require substantial protective easements around boreholes and pipeline routes
- Necessitate permanent access corridors for maintenance vehicles
- Create restricted zones where certain development activities would be prohibited

• Demand additional engineering solutions to prevent contamination of the drinking water supply

#### 5. Conclusion

The combination of severe flood risk, mineral extraction considerations, prohibitive engineering costs, and significant environmental impact renders the land south of the A4 fundamentally unsuitable for substantial housing development. These flood constraints would prevent Taplow from meeting the Task Force's principle of environmental sustainability, which explicitly requires 'flood risk mitigation.'

The NPPF paragraph 181 is clear that "development should only be allowed in areas at risk of flooding where... it can be demonstrated that: within the site, the most vulnerable development is located in areas of lowest flood risk," which would be impossible to achieve in this location.

## **Appendix C: Heritage Assets and Environmental Constraints**

## 1. Heritage Assets and Designations

### 1.1 National Significance Heritage Assets

The proposed development area contains or directly impacts several heritage assets of national importance:

#### Cliveden Estate

- One of the National Trust's most visited properties (National Trust Annual Visitor Report, 2024)
- Historic seat of significant government influence and political intrigue for centuries
- Grade I listed house and Grade I registered historic park and garden (Historic England, 2023)

#### Taplow Court

- Significant historical connection to the modern Olympic movement
- o The property played a pivotal role in the formulation of modern Olympic principles (International Olympic Committee Archives, 2022)
- o Grade II listed building with extensive grounds (Historic England, 2023)

## Taeppa's Mound

- o Archaeological site of national importance dating to the Iron Age
- o Contains the second most significant Anglo-Saxon burial site in the country (British Archaeological Association, 2023)
- Scheduled Ancient Monument with statutory protection (Historic England, 2023)
- Development would fundamentally alter the historic landscape context of this significant monument

## • Dorney Court

- o Grade I listed medieval manor house
- o Continuously occupied by the Palmer family since the 16th century
- One of the finest examples of medieval domestic architecture in England (Society for the Protection of Ancient Buildings, 2023)
- Setting would be directly impacted by the scale of development proposed

## 1.2 Conservation Areas

The proposed development area encompasses or directly impacts several designated conservation areas:

## • Taplow Village Conservation Area

- Designated in 1975, extended in 1992 as documented in Historic England's National Heritage List (2023)
- Encompasses the historic core of Taplow including St. Nicholas' Church and surrounding buildings
- o The Conservation Area Appraisal (Buckinghamshire Council, 2021) specifically notes the sensitivity of its setting

#### • Maidenhead Riverside Conservation Area

- o Borders the proposed development to the south
- The Royal Borough of Windsor & Maidenhead Conservation Area Statement (2022) emphasises the importance of maintaining its riverside character

#### Taplow Riverside Conservation Area

- o Includes the riverside areas
- Contains multiple listed buildings and structures as documented in the Buckinghamshire Historic Environment Record (2023)

#### 1.3 Listed Buildings and Structures

The proposed development area contains an exceptional density of listed buildings:

- Approximately 76 listed entries within the proposed development area and immediate surroundings (Buckinghamshire Council Heritage Register, 2024)
- Historic England's "Setting of Heritage Assets" guidance (2021) emphasises the importance of preserving the setting of these historic structures

#### 1.4 Archaeological Significance

The area has substantial archaeological importance:

- The Buckinghamshire Historic Environment Record (2023) documents Saxon burial mounds at Taplow Court (Scheduled Monument) and findings of multiple Bronze Age artifacts throughout the area
- Archaeological investigations documented by Oxford Archaeology (2021) confirm Roman settlement evidence along the Thames corridor
- Taeppa's Mound contains the second most significant Anglo-Saxon burial site in the country (*British Archaeological Association*, 2023)

#### 1.5 Historic Landscape

The historic landscape character would be fundamentally altered:

- Historic England's Thames Valley Historic Landscape Characterisation Study (2021) identifies ancient field patterns dating to the medieval period
- The Chilterns Conservation Board Landscape Character Assessment (2022) classifies the area as having high historical landscape value
- Multiple historic routeways and rights of way with centuries of documented use
- These features contribute to the historic setting of Taplow and its surroundings, requiring protection under NPPF paragraph 210

## 2. Planning Implications of Heritage Constraints

## 2.1 Development Density Limitations

Heritage constraints would significantly impact development potential:

- Historic England's guidance on "Tall Buildings and Heritage" (2022) recommends building height restrictions near heritage assets
- Research by the Heritage Alliance (2023) demonstrates how heritage constraints typically reduce overall development capacity

## 2.2 Infrastructure Routing Challenges

Heritage designations would create significant challenges for infrastructure provision:

- Historic England's Heritage Impact Assessment Methodology outlines the process for assessing impacts on heritage assets
- Case studies published by the Institute of Historic Building Conservation (2021) demonstrate how heritage constraints affect infrastructure delivery
- Infrastructure routing options would be severely limited by the need to protect heritage assets
- View corridors and setting protection requirements would fundamentally fragment any coherent New Town layout

#### 2.3 Planning Process Complexity

The density of heritage assets would create exceptional planning process challenges:

- The Planning Advisory Service's "Heritage in Planning" guide (2022) details the additional processes required for development affecting heritage assets
- Historic England's "Managing Significance in Decision-Taking" guidance (2021) outlines the extensive pre-application archaeological investigation required
- The likelihood of heritage-based legal challenges is assessed as "extremely high" (*Chartered Institute for Archaeologists Assessment, 2023*)

### 2.4 Comparative Heritage Impact Assessment

Comparative analysis of designated heritage assets across the region demonstrates:

• Taplow's density of listed buildings is 3.8 times higher than the regional average, according to a 2023 Historic England data analysis. This indicates a significantly higher concentration of historically significant buildings in Taplow compared to other areas in the region. (Historic England Data Analysis, 2023)

#### 3. Environmental Designations and Features

#### 3.1 Biodiversity Resources

The area contains significant biodiversity resources:

- Natural England's Priority Habitat Inventory (2023) identifies wet woodland along the Thames corridor
- The Thames Valley Environmental Records Centre biodiversity report (2022) documents:
  - Water vole populations (legally protected)
  - o Great crested newt breeding sites (legally protected)
  - Bat foraging routes and roosts (legally protected)
- The British Trust for Ornithology's Bird Atlas (2021) confirms the presence of 20+ bird species on conservation priority lists

#### 3.2 Tree Preservation Orders

The proposed development area contains extensive Tree Preservation Orders:

- Buckinghamshire Council's Tree Preservation Order Register (2023) documents 40+ individual TPO trees within the development boundary
- The Woodland Trust's Ancient Tree Inventory (2022) identifies several veteran trees within the site
- The Arboricultural Association's Development Site Tree Assessment guidance outlines the significant constraints these create for development layouts

#### 3.3 Ancient Woodland

Ancient woodland within and adjacent to the site creates additional constraints:

- Natural England's Ancient Woodland Inventory (2023) identifies Hunts Wood as ancient semi-natural woodland
- The Forestry Commission's "Standing Advice for Ancient Woodland" (2022) requires buffers of 15-30m to protect ancient woodland habitat

#### 3.4 Landscape Character and Visual Amenity

The site has significant landscape value:

- The Chilterns Conservation Board Landscape Character Assessment (2022) identifies the site as part of the characteristic Thames Valley landscape
- The Landscape Institute's "Visual Representation of Development Proposals" (2021) provides methodologies for assessing landscape impacts
- Natural England's National Character Area profile for the Thames Valley (2022) highlights the importance of maintaining the distinctive character of riverside settlements
- The Thames Valley landscape character provides a distinctive setting that contributes to local identity
- The juxtaposition of nationally significant heritage with a rural setting creates a unique sense of place
- Taplow has a Site of Special Scientific Interest (SSSI): South Lodge Pit. This geological site is a former chalk quarry. It's a significant site for geological conservation due to its late Cretaceous chalk phosphorite deposit, which is unique in Britain and comparable to those in the Paris Basin

#### 3.5 Special Areas of Conservation

The proposed development area has significant constraints related to protected conservation areas:

#### • Burnham Beeches Special Area of Conservation (SAC)

- Burnham Beeches (Corporation of London) and Cliveden (National Trust)
  already receive 700,000 annual visitors, straining these sensitive environments
  (Corporation of London Annual Visitor Survey, 2024)
- o The entire development area falls within the Burnham Beeches SAC 5.6km buffer zone (*Natural England*, 2023)
- SACs are afforded the highest level of protection under the Conservation of Habitats and Species Regulations (2019)
- Formal mitigation agreements exist between the Corporation of London and local authorities specifically to manage population impact (South Bucks Local Plan Evidence Base, 2023)
- Natural England's Impact Risk Zones assessment (2023) identifies that residential developments within the buffer zone require specific mitigation measures
- Within this area developers are required to pay a Strategic Access Management and Monitoring Strategy (SAMMS) Contribution of £2,023.87 per net home. For a 20,000 houses development this would be over £40m of additional costs

#### Wildlife Corridor Function

- o The area forms an essential wildlife corridor between Cliveden and Colne Valley Regional Park (*Buckinghamshire Biodiversity Action Plan, 2023*)
- The Buckinghamshire Wildlife Trust Ecological Networks Map (2023)
  identifies this corridor as a priority habitat connection
- o The corridor supports protected species movement between these larger habitat areas (*Thames Valley Environmental Records Centre*, 2023)

Fragmentation of this corridor would conflict with NPPF paragraph 192(a)
 which requires planning to "identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks"

#### • Legal and Planning Implications

- The Habitats Regulations Assessment process requires rigorous evaluation of impacts on SACs (Natural England, 2022)
- Recent case law (e.g., People Over Wind v Coillte Teoranta, 2018) has strengthened protection for SAC buffer zones
- Development of this scale would require comprehensive and costly mitigation measures that would fundamentally affect viability

### 4. Strategic Green Belt Function

#### 4.1 Settlement Separation

This particular section of Green Belt serves a critical strategic function:

- The Buckinghamshire Green Belt Assessment (2016) specifically identifies this area as preventing the coalescence of Maidenhead and Slough
- Mapping from Ordnance Survey confirms the current separation is approximately 3.5km (Ordnance Survey, 2023)
- NPPF paragraph 143(b) explicitly identifies preventing neighbouring towns from merging as one of the five key purposes of Green Belt land

#### **4.2 Green Belt Assessment**

The most recent Green Belt assessment for the area rated this land as making a strong contribution to Green Belt purposes:

- The Buckinghamshire Green Belt Assessment (2016) methodology provides a robust assessment framework
- The site scored highly on multiple Green Belt purposes including preventing neighbouring towns from merging and safeguarding the countryside from encroachment
- The Planning Advisory Service's Green Belt guidance (2021) confirms the particular importance of protecting strategic gaps between settlements

#### 4.3 Precedent Concerns

Development at Taplow would create significant precedent concerns:

- Research from the Campaign to Protect Rural England (2023) documents the progressive erosion of Green Belt gaps in the Thames Valley
- The Royal Town Planning Institute's "Green Belt: Future Directions" report (2022) emphasises the importance of maintaining strategic Green Belt functions

## 5. Community Identity and Local Opinion

## **5.1** Sense of Place and Local Identity

The distinctive heritage assets and preserved rural setting have generated a powerful sense of place:

- The proximity to London (approximately 25 miles) makes this rural character particularly valuable
- These established characteristics directly contradict the Task Force's principle of establishing 'new towns with a clear long-term vision with a distinct identity'

#### **5.2 Community Sentiment**

Comprehensive local surveys demonstrate unequivocal community opposition:

- Parish-wide consultation conducted in April 2025 showed 100% opposition to the New Town proposal (*Taplow Parish Council's and Hitcham and Taplow Society's Consultation*, 2025)
- Stakeholder engagement exercises demonstrated unanimous opposition from local community organisations, businesses, and resident groups
- These findings align with Buckinghamshire Council's own community engagement outcomes (Buckinghamshire Council Strategic Planning Consultation, 2024)

#### 5.3 Evidence of Proportionate Growth

It is important to note that local opposition is not to development per se:

- The population of Taplow has increased by 50% in twenty years through organic sensitively designed building and is still growing (National Census 2001, 2021)
- This growth has been achieved while maintaining local character and identity
- The Riverside Taplow, Mill Lane development (approximately 220 homes) received the Buckinghamshire Design Award in 2023
- This growth demonstrates a constructive and balanced approach to meeting housing needs

## 6. Assessment Against National Planning Policy

#### **6.1 NPPF Heritage Policies**

The proposed development would need to address multiple provisions in the National Planning Policy Framework (December 2024):

- Paragraph 207: Requirement for applicants to "describe the significance of any heritage assets affected, including any contribution made by their setting"
- Paragraph 210(a): Need to take into account "the desirability of sustaining and enhancing the significance of heritage assets"
- Paragraph 212: Requirement that "great weight should be given to the asset's conservation" when considering impact on designated heritage assets

#### **6.2 NPPF Environmental Policies**

Development would need to address environmental protection policies:

- Paragraph 187(a): Requirement to protect and enhance "valued landscapes, sites of biodiversity or geological value and soils"
- Paragraph 192(a): Need to identify, map and safeguard "components of local wildliferich habitats and wider ecological networks"
- Paragraph 193(d): Principle that "opportunities to improve biodiversity in and around developments should be integrated as part of their design"

#### **6.3 NPPF Green Belt Policies**

Green Belt release of this scale and strategic importance would face significant policy hurdles:

- Paragraph 145: Green Belt boundaries should only be altered where "exceptional circumstances are fully evidenced and justified"
- Paragraph 147: Need to demonstrate that authorities have "examined fully all other reasonable options for meeting its identified need for development"
- Paragraph 151: Requirement to plan positively to enhance the beneficial use of Green Belt land

#### 7. Conclusion

The exceptional concentration of heritage assets, environmental designations, and strategic Green Belt function create insurmountable constraints for the proposed Taplow New Town development. In accordance with NPPF paragraph 153, "substantial weight" should be given to any harm to the Green Belt, including harm to its openness, which would be inevitable with development of this scale.

The density of nationally significant heritage assets, strong existing sense of place, and unanimous local opposition represent significant material considerations in planning terms that would fundamentally undermine the feasibility and sustainability of a New Town development.

The area's demonstrated willingness to accommodate proportionate, sensitively designed growth offers a constructive alternative approach to meeting housing needs while preserving the exceptional heritage and character that makes the area distinctive.

These constraints directly conflict with multiple Task Force principles, particularly regarding 'accelerated delivery,' 'higher density development,' and the establishment of 'a clear identity' for new communities. The substantial evidence presented demonstrates that Taplow represents one of the least suitable locations for New Town development within the wider region.

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