



Maidenhead Civic Society

Planning Policy (BLP)
RBWM
Town Hall
St Ives Road
Maidenhead
SL6 1RF

20 September 2017

Dear Sirs,

**Re: Civic Society Response to the Reg 19 Consultation on the Borough Local Plan
(Submission Version)**

Thank you for the opportunity to comment on the final draft Submission Version of the BLP. Our observations are outlined in the accompanying pages.

In summary, our overriding concern is the practical impact of so many dwellings, an estimated increase of 45%, on the compact town centre of Maidenhead and the lifestyle of residents.

We recognise that some growth is inevitable and necessary but we believe that the numbers of homes proposed are unsustainable and inappropriate. The Society is a strong supporter of the Green Belt but we feel that much greater effort is needed – including an uncomfortable debate on green field sites – to reach an acceptable compromise.

We hope you find our comments helpful.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Bob Dulson', written in a cursive style.

Bob Dulson
Chairman



Response from Maidenhead Civic Society on the Borough Local Plan Submission Version (BLP)

Headline Comments

- Clearly there is a need for more housing, including affordable homes, to meet existing demand, anticipated growth and, especially, housing for the elderly and young families.
- The assessed need of 14,260 new homes over Plan period equates to 24% increase across the Borough. We would have preferred to see:
 - a simple strategy of adding 24% to each existing settlement to share the load, or
 - the creation of new settlements but we understand this was not considered.
- Maidenhead seems destined to take 70% of the total, i.e. 9,982 new homes, which equates to a 45% increase in population and cars. We believe this undermines the admirable aspirations of the Spatial Vision for a safe, healthy, sustainable environment and has serious implications for traffic, parking and the flood plain. There is little comfort in the Infrastructure Delivery Plan which is merely a wishlist. We are also expected to accept that SPDs (as yet unwritten) on key issues like heritage assets and character & design will deliver the necessary guarantees.
- With its Thames Valley location, unrivalled accessibility and leafy suburbs, Maidenhead is a desirable place to live, offering quality homes in a high quality environment. This is its main appeal. A Local Plan that advocates higher densities, 10,000 mainly flatted new dwellings (there is no stipulation for variety) and relaxed rules on infill development, threatens both its appeal and its character.
- A key concern is the removal of restrictions on the location and height of tall buildings in the town centre. The Maidenhead Town Centre Area Action Plan (AAP) represented a community consensus on town centre rejuvenation. Its policies were firm but flexible and encouraged growth. We believe the AAP policies on tall buildings and the need for a sustainable mix and choice of housing in the town centre should be retained.
- Notably absent from the BLP is anything constructive on Arts, Culture and Tourism in Maidenhead. It also comes without vital supporting documents like an up-to-date Transport Plan, Parking Standards and the anticipated Design Guide. The Heritage Strategy Supplementary Planning document (SPD) is also absent.
- In essence, we feel we're being asked to agree a Plan which paints a less than comprehensive picture of how the Borough should evolve. Other options could and should have been explored with the community. Criticism about a lack of public engagement during the process was justified. The Plan pursues a political imperative. Whilst purporting but failing to protect Green Belt, it overturns much of the community-approved Town Centre AAP to doggedly deliver the numbers.

Below, we select topics and statements from the BLP Submission Version and add our comments, **headlined in bold**.

Spatial Portrait

3.4.11 ARTS & CULTURE: This **sketchy reference** does not reflect the plethora of musical and artistic activities or the need to encourage and accommodate them in future.

3.6.5. Water Usage is said to be a key consideration. Maidenhead is in a Source Protection Zone I where groundwater supplies are at greatest risk from development. As well as climate change, supplies will also be affected by the huge numbers of homes planned for the town. Where are the policy plans for this or is to be left to the Water companies?

Key Spatial Issues

p.21 **Admirably sets out the stall** and covers the ground

4.2 SPATIAL VISION: **A good, positive statement of intent.**

Objectives

Obj 2: Meeting housing needs: Includes the statement “provide housing to meet the needs of all sections of the community”, **but nowhere is there any guidance on the style or type of housing expected.**

Obj 9: Talks of need to protect/enhance natural environment, including the water environment. **Nowhere is there any specific requirement to protect or maintain Maidenhead Waterway** which is a key element of the town centre regeneration. This is a serious omission.

Spatial Strategy

5.2 Policy SP1 Spatial Strategy and elsewhere throughout the document **assumes that “sustainable” means near a rail link.** Sustainability can be achieved in many other ways.

Quality of Place

6.1 Context - **admirable aims**

6.3 Policy SP2 Sustainability and Placemaking: **Welcome the statement that developments should “positively contribute” to their location** and foster a sense of community and place through high quality design.

DESIGN

6.4.4 A Design Guide SPD is promised. **We hope this will include guidance on minimum space standards,** in line with the RIBA code for minimum dwelling sizes. But we think this should also be included **as a policy requirement.**

6.4.6 This paragraph implies that **tall buildings would be considered outside the area of Maidenhead town centre. Surely this is not the intention.**

6.5 Policy SP3 Character & Design

A paragraph in the Reg 18 version stipulated the delivery of “adequate levels of parking that is logical, safe and secure for users and not dominating the landscape”.

This has disappeared. SP3 also replaces Reg 18 HO5 (Housing Layout & Design) which required “convenient, accessible parking close to the housing being served”. This too is deleted.

Instead, there is now just a line stipulating that the design of new developments should “minimise the visual effects of traffic and parking”.

Maidenhead has one of the highest levels of car ownership in the country. This will not change in the foreseeable future. Government guidelines may be trying to insist that public and alternative forms of transport are preferable. But for the majority of Maidenheadians the car is an essential asset and accords with the lifestyle. It is naïve to assume that the influx of new residents anticipated with Crossrail will be any different. New arrivals will be attracted, as current residents were, by the lifestyle that Maidenhead has to offer. We don’t have buses passing our door every five minutes or a tube station at the corner. **Without a seismic shift in public transport provision, which is unrealistic, the car has to be accommodated.**

Recent examples have shown that major employers will not relocate to or expand in Maidenhead unless parking is provided; and residential estate agents say flats without associated parking are virtually impossible to sell.

We would like to see a policy which stipulates that all new development should be self-sufficient in parking, preferably with provision underground. Recent developments in the town centre prove this is viable.

Tall Buildings

SP3 Para 2 overrides AAP MTC 6 to allow greater flexibility on tall buildings "within and near to Maidenhead town centre". ***i.e. no height or location restrictions***. The Town Centre AAP, which represented a consensus of public opinion, acknowledged the need for modest growth while retaining a small-town feel, with tall buildings in a few selected areas.

The effect of SP3 Para 2 will be to change dramatically the character of Maidenhead town centre and nearby areas. If this is intended, it should have been communicated as such and consulted upon. If not, it should be redrawn, or MTC 6 re-instated.

Clustering small flats in town centre will adversely affect the mix. Police advice should be sought on the potential for social behavioural problems.

RIVER THAMES CORRIDOR

6.7 Policy SP4 River Thames Corridor

Pleased to see this. The River Thames Society with Civic Society support were instrumental in getting a River Thames policy added into the LDF back in 2006/7.

Para 3.d could more specifically protect and enhance sustainable leisure facilities.

Maidenhead Waterways

Amazed and disappointed at the absence of any reference to the Waterways, except a desire later in the document to see it enhanced by appropriate development. Such a key element of the town centre regeneration surely **should have a Policy to govern its protection and maintenance in future**. The waterway in the town centre has dried in the recent past. It must not do so again.

GREEN BELT

6.8 The Civic Society is a staunch supporter of the Green Belt. We note the intention to remove some PD rights and look forward to the Green Belt SPD which promises more guidance.

6.8.24 If Green Belt has to be used, rather than a glib but broken promise to protect it, we believe **more effort should be made** – including an uncomfortable debate with the community – **to identify areas which are more brown than green.** .

We question the proposed use of Maidenhead Golf Club for development. As the town expands in future, as it surely will, this land could provide useful parkland close to the town centre. The Borough is below par on green space in built-up areas.

6.9 Policy SP5 Development in the Green Belt – **Concise and clear**

6.11 Policy SP6 Local Green Space designates only Poundfield as LGS. **We need a commitment to address the fact that the Borough is below par on green space in built-up areas.**

N.B: A further Policy has been dropped from the Reg18 version - SP7 on Countryside Character. This may be covered by the Green Belt policy but there is little on the need to preserve/improve character.

Housing

7.2.7 Promises a step change in provision of housing in Maidenhead town centre that will bring higher urban intensity through mixed use sites, increasing the number of residents and enhancing vibrancy and vitality.

With the same aims, **the AAP proposed a variety of 750 homes across six OAs. The BLP proposes around four times more, with a preponderance of high-rise flats.** No matter how well designed, **we have grave concerns about the implications of such a scale of development** for facilities, infrastructure, traffic, movement and public safety.

The town centre is reliant on its ease of access and convenient parking. We threaten those at our peril. And **Traffic modelling of the BLP does not bode well.**

AAP Policy MTC12 Housing stipulated that all proposals in the town centre should contribute to **a mix and choice of housing.** (Total was 750 in six OAs.) MTC12 is overridden by HO1 which is all about sites and numbers. There is a broad requirement in HO2 for an appropriate mix of types and sizes, in line with SHMA evidence. **But there is no stipulation for the types of dwelling in HO1 or HO2,** so nothing to encourage, say, terraced or town houses in the town centre mix.

7.4 Policy HO1 Housing Development Sites

Mindful that recent comments by Communities Secretary Sajid Javid could increase RBWM's annual housing requirement from 712 dpa to 778, we welcome **the further call for sites,** recently announced, and hope this **may provide an opportunity for compromise on some existing allocations.**

7.5.1 Mix & Type: NPPF says LAs should identify size, type tenure and range required, according to local demand. **We could see no such stipulation. When/where does this happen?**

7.11.1 States that a minimum net density of 30dph is deemed appropriate across the “district” (undefined). We appreciate that **sensitive, good design can offer higher densities in attractive packages**, e.g. terraced or mews-style houses can deliver higher densities than 3-storey flats.

However, Reg 18 HO8 on **Development in Residential Gardens** has been deleted. It is not covered adequately anywhere else. So, in the absence of any restriction, **back garden infilling is given the green light, threatening the character of many suburbs in Maidenhead**, which are the main attraction for home owners.

Town Centres & Retail

9.4.1 Retail studies support the view that a successful retail sector is key to securing a vital and viable town centre. **Agree but it has to remain accessible with easy parking.**

9. 8.7 Agree that The **Waterways Restoration is a key driver** for town centre rejuvenation but would **like to see a specific policy to protect and maintain it.**

9.8.8 **Agree** that a review of the AAP should seek to reflect the changing retail circumstances while maintaining requirements for high quality development.

9.9 Policy TR3 Maidenhead Town Centre

Para 4 **Welcome** the statement that proposals to expand the cultural, entertainment and food offer will be encouraged. We are particularly **keen to see York Road OA develop to become a “destination” civic and cultural quarter.**

Para 5 Encourages proposals that make efficient use of sites by intensification, higher densities or innovative design. **We would welcome architectural features that reflect the town’s history.**

Para 6 Encourages tall buildings of exemplar design, as long as they don’t compromise the character and appearance of the centre or the Conservation Areas. As phrased, this invites a free-for-all. **We prefer MTC 6’s more considered approach.**

Para 7 Welcomes proposals for residential use on upper floors and those that would enhance the town’s waterways. **Agree.**

Visitors & Tourism

10.4 Policy VT 1 Visitor Development - minor re-write & incorporates former VT2. **A statement re. the importance, protection and enhancement of Maidenhead Riverside** as the town’s main tourist attraction **would have been welcome.**

Historic Environment

11.3 Policy HE1 Historic Environment.

This promises a register of heritage assets at risk. **The Civic Society with others has sought to protect the setting of Ockwells Manor (Grade I). In 2012 RBWM Cabinet agreed to do this** and designate a field opposite as Green Belt **but this is not reflected** in the BLP.

Natural Resources

12.2.2 FLOOD RISK: Highlights the need to adapt to climate change through careful flood risk management.

12.2.7 If not effectively managed, new development will affect the severity of flooding due to the resulting physical loss of floodwater storage capacity on a site and by impeding the flow of floodwaters across a site. **Agree. This is a key sentence.**

12.3 Policy NT1 Managing Flood Risk & Waterways. **Reads well - agree**
We accept that significant areas for housing development must be identified within the Local Plan although we are concerned to protect the Green Belt from unnecessary incursion. **But we are equally concerned at increasing flood risk -** not only for the new developments but existing residential areas.
Making new build properties resilient to flooding (by raising floor levels etc.) does not address the issue of water displacement and increased run off which impacts existing properties.

Flooding is not restricted to fluvial overflow. **Ground water or standing water are just as problematic.** Indeed the persistence of flood waters after river levels have subsided is a result of ongoing saturation of the water table. Proposed sites prone to ground water or standing water will have continual drainage problems if developed. Flood risk and water management are an inherent element of sustainable development and the NPPF "presumption in favour of sustainable development" should take due notice of flood related issues. **We would like this to be addressed in the Policy.**

Infrastructure

SUSTAINABLE TRANSPORT

14.4.2 Make fullest use of public transport, walking cycling. Focus significant development in the most sustainable locations. **Admirable objective, but the effects of such concentrated masses of development may be counterproductive, e.g. in Maidenhead town centre.**

One Solution – Maidenhead Parkway?

This is not a new idea but **consideration should be given to creating a railway "halt" in the Cannon Lane/Woodlands area.** This would give residents in Cox Green and surroundings areas their own rail access and provide an alternative for commuters from the west of the Borough, thus helping to reduce the large number of passengers and traffic that we expect to be drawn to Maidenhead by Crossrail.

With the same aim, RBWM should also **explore with South Bucks the opportunities for expanding the parking provision at Taplow station** to assist residents from the east and north of the Borough.

14.4.14 Development proposals with zero parking in town centres will be considered, if it does not create or exacerbate parking problems. **This and the following paragraph need careful thought.** (See our response to 6.5 above)

14.4.15 Minimum standards will be set for residential development but these will not undermine the sustainability objectives of the BLP

14.6.3 Says that parking provision should be consistent with the Council's Parking Strategy (which is still awaited). **We hope the promised SPD** will not simply set minimum standards on the basis of "sustainability" but **will recommend that new development, whether residential or commercial, will incorporate adequate, convenient levels of parking.**

OPEN SPACE

14.10.5 Acknowledges that the Borough has an under provision of open space against recommended local standards and underlines the need to protect and increase provision, particularly with new development. **Pleased to see this.**

14.10.6 Suggests new schools grounds should be available for community use. **Good idea**

RIGHTS OF WAY

14.13 Policy IF5 Rights of Way and Access to the Countryside: Spells out the need to protect existing 300km network of paths and cycleways. Encourage new walkways and pedestrian links. Improve public transport links to the countryside. This is **an improvement on the initial draft, however it could usefully reiterate the Council's ability to invoke a Path Creation Order if appropriate.**

NB: HA2 (Reform Road) and the proposed footbridge across The Cut from Cedars Road provide **an opportunity to create a pedestrian route from the civic centre to the riverside at Guards Club Park.**

BRAYWICK LEISURE CENTRE

14.15 Policy IF6 New Sports & Leisure Development: We're told the choice of site was arrived at through sequential assessment. We understand the Council's rationale and the idea of **a new, well-equipped centre is very welcome but we have heard questions about the chosen location** and worry for the effect on the HighStreet. The Magnet is very popular and an assessment of the current users, their travel arrangements and where they come from would be useful. As proposed, **there is an opportunity to incorporate wildlife features in the grounds.**

COMMUNITY FACILITIES

14.17 Policy IF7 Community Facilities: Supports the idea of new or improved community facilities with a proven need, without being specific. The Civic Society believes that **a cultural facility in the York Road area, alongside the town hall, library, museum and amphitheatre, could provide a "destination attraction".**

OPEN SPACE STANDARDS Appendix G

These are well meant and welcome but might benefit from a re-working with professional help from the likes of BBOWT, National trust and RSPB

BD

20/9/17

