



Maidenhead Civic Society

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NPPF Consultation
Planning Policy
MHCLG (by email)

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Dear Sir/Madam,

On behalf of Maidenhead Civic Society, thank you for the opportunity to comment on proposed changes to the National Planning Policy Framework (NPPF).

Our Society supports the idea of delivering high quality design through the planning system and welcomes the aims of the Building Better, Building Beautiful Commission (BBBC) to:

- Promote better design and style of homes, villages, towns and high streets, to reflect what communities want, building on the knowledge and tradition of what they know works for their area
- Explore how new settlements can be developed with greater community consent, and
- Make the planning system work in support of better design and style.

Consequently, we welcome the attempt to reflect the government's response to the BBBC and through the National Model Design Code (NMDC), and we are encouraged by the emphasis on early engagement with local residents.

However, this appears to be at odds with the process proposed in the Planning White Paper (PWP). The PWP suggests that once a design code has been set, development will be allowed to go ahead without further consideration by local councillors or communities. If this is the intention, we object strongly. Excluding the public from commenting on planning applications hardly accords with "world-class civic engagement", to which the Government aspires elsewhere in the PWP.

Our LPA is the Royal Borough of Windsor & Maidenhead, comprising Windsor, Maidenhead, Ascot and other towns and villages in an area which includes 82% Green Belt and large tracts of floodplain.

Maidenhead Civic Society was established in 1960. In the absence of a Parish Council, it provides the only recognised community voice - apart from vested interests - on planning matters for the unparished wards of Maidenhead. The Society is totally independent, apolitical and has 300 members.

We are frequently consulted on proposed developments and, on average, scrutinise objectively around 180 applications each year, commenting on 50 of them. Our criteria include scale, visual impact, design, character and compatibility, living and amenity space and, crucially, appropriateness in flood plain, conservation area or green belt.

We believe that communities and society are best served by enabling public engagement throughout the planning process.

Our key concerns are:

- We welcome earlier engagement, but communities must still be given the right to consider and respond to individual planning applications.
- We fear the NMDC will be undermined by the PWP proposals for reformed community engagement in planning
- The delivery of high quality design will be undermined by the widening of permitted development rights preventing a planned approach to our town and city centres and by limited local authority resources.
- Detailed examination often highlights idiosyncrasies vital to the character of an area which may well get overlooked in a streamlined system, e.g. design elements, which are usually the first to suffer from budget paring

Our specific comments on Proposed Changes in selected Chapters of the NPPF are as follows.

Chapter 2: Achieving Sustainable Development

Broadly agree with the proposed changes but the principle relies on the existence of Local and/or Neighbourhood Plans that have been adequately researched and drawn up with local community involvement – a requirement missing from both this document and the Planning White Paper (PWP). We believe there has to be a commitment to community involvement throughout the planning process.

Chapter 3: Plan-making

Agree entirely that local plans should “provide a positive vision for the future of each area” but this needs to take account of the context, the compatibility and connectivity with neighbouring sites/areas, as well as providing an opportunity “for local people to shape their surroundings”.

Agree that a longer-term vision (of at least 30 years) is appropriate when planning for new settlements.

This Chapter (Paras 24-27) also refers to the Duty to Cooperate which we believe should be enforced and monitored.

Chapter 4: Decision making

We objected strongly in December to the proposals to extend Permitted Development Rights primarily because of the potential damage it could do to the character of our high streets and town centres but also because it further undermined the ability of communities to have a voice in the future of their area.

We do not agree to the proposed changes to Para 53. To preserve and enhance the character of streets, places and areas in their responsibility, Local Authorities should be encouraged to consider Article 4 directives as part of the strategic planning process, albeit applying them to the smallest possible geographical area.

Chapter 5: Delivering a sufficient supply of homes

We'd be more encouraged if this chapter was headed *Delivering a wide choice of high quality homes*, as in the accompanying consultation document, rather than version above from the NPPF, and that Para 60 was amended accordingly.

We have no objection to other changes proposed in this chapter.

Chapter 11: Making effective use of land

We agree that Area-based character assessments, codes and masterplans *should be* tools in ensuring that developments make optimal use of the potential of each site.

Chapter 12: Achieving well-designed places

We welcome:

- the new emphases placed on good design and creating better places (in Paras 125, 127 & 133)
- the need to involve local communities in devising the policies to support that (Paras 126 & 128), and
- the commitment to ensuring that all new streets are tree-lined, and to retaining existing trees (Para 130).

However, as stated earlier in this response, we are seriously concerned by the implications in the PWP that community participation will cease once the development zoning and design codes are agreed. It's one thing setting up priority areas for development; it's another to retain some control on what exactly is built.

As well as being drawn up with community involvement, the implementation of Design Codes should be closely monitored too. Design elements are usually the first to suffer from budget paring.

Moreover, we would advocate the introduction of a Community Right to Appeal under which a prescribed number of objectors can challenge an approved application. This seems even more appropriate in a world of "fast-tracked" applications.

Chapter 13: Protecting the Green Belt

We have no objections to changes proposed in this chapter.

Chapter 14: Meeting the challenge of climate change, flooding and coastal change

We have no objections to changes proposed in this chapter.

I hope you find this helpful.

Yours faithfully,



Bob Dulson
Chairman
Maidenhead Civic Society