

# **RBWM Comments on the Regulation 14 Consultation draft of the Maidenhead Neighbourhood Plan**

**December 2024**

Thank you for providing the opportunity to comment on the Regulation 14 draft Maidenhead Neighbourhood Plan and congratulations on reaching this stage. Thank you too for the constructive dialogue we have had as you have prepared the Plan.

We are aware that you have not had an opportunity to address some of the comments that we made on your working draft so we have included those comments again in our comments below on the Regulation 14 draft Plan.

We have the following comments to make on behalf of the Royal Borough on the Regulation 14 draft Maidenhead Neighbourhood Plan:

## **General**

The plan is clearly laid out and well-presented so well done.

You will be aware that the Government has just published a revised version (Dec 2024) of the NPPF – you will want to consider the Plan against this new NPPF **MNF 1.1** as part of ensuring you satisfy the basic conditions, subject to the transitional arrangements in Annex 1 of the new NPPF.

## **Chapters 2 and 3**

In the Borough Local Plan (BLP), Maidenhead is identified as one of three growth areas to which the majority of growth in the Borough is directed. The extent of development allocations in the BLP in Maidenhead mean that Maidenhead is the area with the most growth identified and hence the key location for delivering the spatial strategy of the BLP.

A key consideration for the Maidenhead Neighbourhood Plan (MNP) is whether the policies in the MNP individually or cumulatively adversely affect the delivery of the town's strategic role in the BLP. We have some concerns that it may do, particularly the cumulative impact of policies that could affect housing delivery, in particular policies relating to car parking policies.

The Plan would benefit from including a small subsection setting out the strategic planning context for Maidenhead early on, perhaps in section 3, so the reader understands the growth plans for the town in the BLP. This could include reference to key policies in the Borough Local Plan such as SP1 Spatial Strategy and also highlight the scale and broad location of where BLP growth is planned in Maidenhead – e.g. Maidenhead Town Centre and South West Maidenhead etc. At the moment there is just passing reference to the scale of growth. **MNF 1.2**

## Chapter 4 Design

### Policy DE1 – Design Principles, Town Centre

We welcome the general approach in this policy and its consistency with the Building Height and Tall Buildings SPD. In bullet point 2 it would be helpful to refer to not just the SPD but also the parent policy of the SPD, i.e. Policy QP3a of the BLP – so bullet point 2 of the policy could read:

- *Development proposals must demonstrate full regard to the key principles set out in **Policy QP3a of the Borough Local Plan and in the Building Height and Tall Buildings SPD [Part 2, 2.13]** as they apply to Maidenhead **MNF 1.3a***

On a point of detail, none of the South West Maidenhead Placemaking Area and related SPD are within the town centre boundary, so the last sentence of this section would be better amended as follows:

*South-West Maidenhead is covered by separate SPDs and BLP policy, ~~so~~ **and** is not included in the town centre **MNF 1.3b***

### DE-3 Liveable Buildings

We welcome the consistency with the Borough Design Guide space standards.

## Chapter 5 Housing

### Policy HO-1 – Affordable Housing

2<sup>nd</sup> bullet point part (a) requires 20% of affordable housing to be affordable home ownership or shared ownership

The BLP requires 20% as intermediate but the Affordable Housing SPD is more specific, indicating a preference for shared ownership. Although the wording in the Neighbourhood Plan above is not the same as the BLP, it delivers broadly what we are looking for and is not inconsistent with the BLP 20% intermediate requirement, given that shared ownership is part of the intermediate tenure. You may be aware that the Council has now adopted the Affordable Housing Delivery SPD.

The only issue is whether the reference to affordable home ownership might open the door to other products, such as First Homes, which are not supported by RBWM, but you will see in the Affordable Housing Delivery SPD the transitional arrangements that are in place in relation to that product.

Reasoned justification:

The section on private rented states that there were 207 properties for rent with a monthly rent of £2,650. Presumably this is meant to say “with average monthly rent of £2,650”? **MNF 1.4**

## Policy HO-2 Market Housing Mix

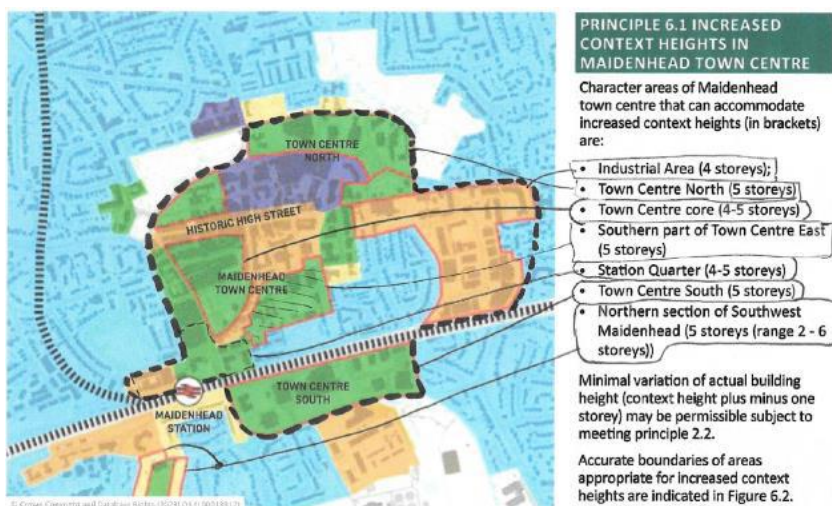
The aspiration of securing more family housing outside of the town centre is welcomed. There will be site specific circumstances where this cannot always be achieved, and this should be recognised in the policy, as the BLP supporting text also recognises that there will be local circumstances that will need to be taken into account.

In addition, the BLP allocated sites outside of the town centre provide an opportunity to deliver more family housing. Site proformas in the BLP set out site specific requirements for the allocated sites. In relation to the largest of these, site AL13, this sets out detailed requirements in relation to the form of development in the two distinct neighbourhoods that will make up that development area. The South West Maidenhead SPD develops this thinking further in terms of what it means for dwelling mix across the site. In this instance, achieving 80% 3 and 4 bed units may prove to be unrealistic and not consistent with the BLP policy proforma requirements across the allocation as a whole.

As such the following amendment to the second bullet point of the policy is recommended, which also

- *Subject to local circumstances and requirements in the Borough Local Plan site proformas (Appendix C of the BLP), outside Maidenhead Town centre the market housing **element of** development proposals are expected to provide 20% flats (1 and 2 bed) with 80% maisonettes and houses (3 bed and above).* **MNF 1.5**

Town Centre Boundary – the town centre boundary referred to in this policy is the one shown below in Policy DE-1 – extract below.

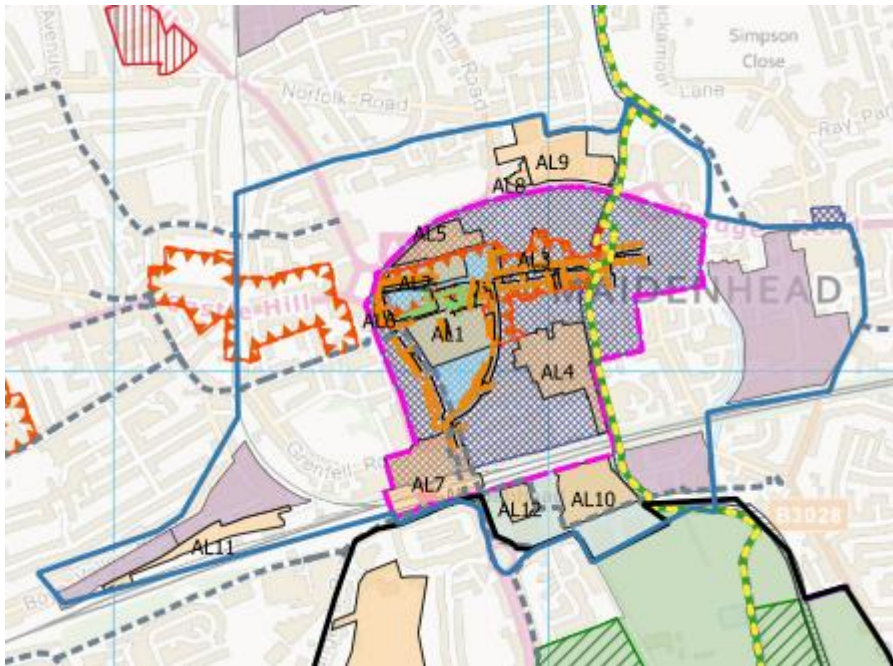


We note this is different to the town centre boundaries shown in the BLP. There are 2 different town centre boundaries in the BLP, one relating to retail policies and the other to show the placemaking area for Maidenhead Town Centre (see below), so across the two plans there could be three different town centre boundaries.

It may be beneficial and less confusing to use one of the town centre boundaries in the BLP for policies in the Neighbourhood Plan to relate to, and we would recommend the Placemaking area boundary, having regard to the policies that specifically relate to the town centre boundary (e.g. housing mix and car parking).

**MNF 1.6**

*Placemaking area town centre boundary in the BLP - see blue line below:*



## **Section 6 Getting Around**

### GA-1 Cycling, walking, bus routes

We welcome the principles set out in this policy.

In relation to bullet points 6 and 7 relating to the 500m from a bus stop, we welcome the principle but feel it will be important that consultation takes place both with bus companies and RBWM to ensure that there are practical means of improving bus stop provision in the area where that is required to support new development. **MNF**

**1.7a**

Regarding the provision of laybys with bus stops, whilst this form of provision exists in the Borough, best practice is to not have laybys for bus stops as it is slower for the buses and bus users – in terms of slower approach speeds and delays for buses in reintegration with other traffic on exit. We would recommend reference to laybys to be removed. **MNF 1.7b**

### GA-2 Parking and Cycle Storage

In relation to residential parking, we note that although the parking standards in this section are similar to those set out in the Council's 2004 standards, we are not convinced that these standards work on sites in a town centre setting. The standards in the town centre are too high and we recommend that you review these further to ensure that they do not undermine the deliverability of development, particularly residential development. This is particularly the case for higher density, higher rise development in the town centre where there is a particular need for flexibility. We raise this because delivery of a substantial element of flatted development, often involving significant height, is an important element of the Borough Local Plan strategy for delivering housing growth in the Borough and it is important not to undermine it. **MNF 1.8a**

It is important that the standards set out in GA-2 are applied flexibly to take account of site-specific circumstances and locations, and particularly in, or close to, the town centre where accessibility is much better and there are better opportunities to use public transport – two key factors highlighted in the National Planning Policy Framework. It is important that flexibility is applied to ensure development is facilitated wherever possible. As such we believe it is still better to refer to “optimal standards” in the policy. **MNF 1.8b**

We also note that the town centre boundary is drawn fairly tightly and there will be development opportunities close to the town centre that are still in accessible locations where the higher levels of provision may not be appropriate (see also our comments above about the definition of the town centre boundary).

- *New purpose built residential developments or conversions will be expected to provide off-road allocated parking spaces and cycle storage as indicated in the optimal standards set out specified in Table 6.2-1. Account will also be taken of local and site-specific circumstances including accessibility and availability of public transport and the need to avoid potential impacts of overspill parking in the local area.* **MNF 1.8a see above**

The policy or supporting text should acknowledge that RBWM is preparing a Parking SPD and that when adopted this too will be a material consideration. **MNF 1.8c**

We note that there is no reference to disabled parking at the moment – this should be included. For instance, this could be by reference to the current RBWM 2004 standards or successor document (such as the Parking SPD). **MNF 1.8d**

Re commercial parking, we note that this distinguishes between warehousing and other office, commercial and retail uses. However, parking requirements will vary considerably between different uses. We believe there should be further disaggregation of this standard between different uses – e.g. different types of retail, industrial, office – as the level of parking needed can vary significantly between these uses. This is notwithstanding the fact that some of these uses may be part of the same use class in the Use Classes Order. The use of the term “commercial” is too general when it comes to parking standards. **MNF 1.8e**

Again, Bullet point 5 should refer to optimal standards and build in similar wording to that suggested above for residential to ensure there is sufficient flexibility in the way standards are applied.

In addition, the approach needs to recognise the role that town centre parking plays in new development. **MNF 1.8f** For instance, it would not be expected for a new retail development in the High Street to providing its own bespoke parking provision – this would not be practical or appropriate. The policy needs to be amended to provide flexibility.

We note the reference to roof top parking but consider that is unlikely to be practical or viable in the vast majority of cases and is unlikely to be viable given the extensive ramps that are likely to be required to achieve it. It is best not included in the policy **MNF 1.8g**, though if it was felt strongly that some reference should be retained, to include it in the supporting text.

### GA-3 Public Transport Interchange

Whilst we do not have any objection to this policy per se we do not really see the need for it because it is difficult to see where there is likely to be new station/rail development taking place during the lifetime of the Plan and the current Maidenhead Railway Station has public transport interchange facilities anyway. **MNF 1.9**

## **Section 7 – Climate**

### CL-1 – Net Zero

We welcome the objective of seeking net zero development. This is in line with the objectives of the Council's Climate Change policy in the BLP and its wider Environment and Climate Strategy. We also welcome the evidence base you have prepared to support this policy.

## **Section 8 Built Heritage**

Thank you for working with us on this section. We have re-iterated some of our earlier comments below where you have not had a chance to address in the Regulation 14 document.

### BH-1 Buildings in Conservation Areas

Second bullet point – please omit reference to buildings identified as having a 'negative effect'. Each case must be assessed upon its own merits and the principle of demolition cannot be established based on such an identification. It is suggested that the wording is amended to '*Existing buildings should be retained in order to preserve the character and appearance of the conservation area. Loss of any buildings must be robustly justified as part of the application submission.*' **MNF 1.10a**



#### BH-2 Gardens, open spaces, street patterns and parking in Conservation Areas

First bullet point – omit reference to ‘*unless identified in the conservation appraisal as having a negative effect*’ **MNF 1.10b**

#### BH-3 Setting of Heritage Assets

Third bullet point - The setting of a CA includes both the environment within and surrounding the CA. The wording of this point needs to be amended. Reference to ‘*pattern of the conservation area*’, it is not clear what is meant by ‘pattern’ – suggest replacing with the word “grain”. **MNF 1.11a**

General point: The policy wording only focuses on conservation areas and listed buildings, no reference is given toward other heritage assets such as those included on the proposed local list. The wording should be robust to cover all heritage assets, including non-designated ones. **MNF 1.11b**

#### BH-4 Local List of non-designated Heritage Assets

Bullet point 1 – for clarity, suggest amending to “Existing buildings should be retained”. **MNF 1.12a**

Bullet point 4 - The word ‘*compatible*’ should perhaps be amended to ‘in keeping with’ or ‘preserve’. **MNF 1.12b**

Bullet point 6 - Views cannot be considered as NDHAs and should be ideally considered separately. Views relate to spatial, and townscape assessments, and important views are not just heritage related. Suggest changing wording to “landscapes”. **MNF 1.12c**

#### Other Comments on Built Heritage section:

- A map showing all heritage assets located within the Maidenhead NP area would be a useful addition to this plan. **MNF 1.13a**
- The plan has made no consideration towards archaeology. Maidenhead is rich in history including below ground archaeology and it is disappointing to see it has not been mentioned at all. **MNF 1.13b**

### **Section 9 Biodiversity**

Map 9.1.1 – we note that Maidenhead Golf Course is shown in purple on the plan but with green areas and corridors within it. As the BLP allocates the site for housing the purple colour should be removed and it should be left as a background grey colour, similar to the housing allocation at Spencer’s Farm. **MNF 1.14a**

We welcome showing the green corridors on the Golf Course site but as per the note accompanying the map we suggest that the alignment for the north/south corridor at its southern end is not correct and should be further east to align with Kimbers Lane, as shown in Framework diagram at Figure 4 (page 27) of the South West Maidenhead Development Framework SPD (Dec 2022) – see small extract below: **MNF 1.14b**



### SS-2 Local Green Spaces

Third bullet point - this refers to “complying with other policies in this plan” and lists things like changing rooms, pavilions etc. This is slightly confusing terminology as the Plan does not include policies on the matters listed, so there is nowhere in the plan to refer to. Suggest this needs amending. **MNF 1.15a**

Paragraph 108 of the NPPF indicates that policies for managing development within Local Green Spaces (such as SS-2) should be consistent with the policies for Green Belt in the NPPF. A key requirement of NPPF policy for Green Belts relates to keeping land open – this could be more fully reflected in Policy SS-2 to ensure consistency with NPPF Green Belt policy. **MNF 1.15b**

### **Section 11 Infrastructure and Developer Contributions, and Section 12 Delivery and Implementation**

We would welcome the opportunity to comment on these sections when they are available.

### **Appendix 2 Maidenhead Design Code**

See the comments at the end of this response. **Please see MNF responses added**

### **Appendix 4 Local List of non-Designated Heritage Assets**

We would refer you to our earlier comments on this Appendix and trust that you have taken these into account.

**The following updates have been made in list dated 4-Mar-2025:**

- a) Selection criteria extracted from English Heritage Advice Note 7
- b) Compilation and selection method summary provided
- c) Description and Justification for each asset updated and linked to selection criteria
- d) Asset numbering and system added



e) Views replaced by Landscapes and updated

f) "The Ark" pub now included

## Detailed comments on Appendix 2 Maidenhead Design Code

Section / Principle	Comments
<i>General comment</i>	GB01 Eco-design and Sustainability, MN01 Active travel and integrated Neighbourhood MN02 Public realm enhancements and traffic calming – best sections, very well written. The bulletin really helps to skim though.
<i>General comment</i>	There doesn't appear to be much encouragement of innovative design in this document in line with paragraph 135c of the NPPF. In fact, the word innovation (or any variation thereof) is not used once in the document. The "opportunities" presented mainly seek development to conform with the existing character and built form.
<i>General comment</i>	Within most character areas, buildings "must" or "should" be no more than 2.5 storeys. This may be challenging for new non-residential development, new blocks of flats, or even upward extensions.
SE01 <b>MNF 1.17c:</b> <b>Request AECOM to rewrite</b>	The code is a little confused by points jumping from townscape to signage to shopfront and back to signage again. Town/streetscape should perhaps be separated out from signage and shopfronts. Reference to materials of shopfronts and signage should be included in this section particularly in relation to historic environments and historic buildings alongside traditional shopfront designs/features. Point 3 – This point is too open ended, 'signage should be improved' would provide clear direction of this code. However, how it should be improved needs to be included, i.e. avoiding internally illuminated signage, box fascias, materiality of signage etc. Point 6 – Amend the word 'old' to 'historic' buildings. The listed building and area's historic character and setting should be preserved. Recommended this point is reworded.
CA1.01 <b>MNF 1.17d:</b> <b>Request AECOM to rewrite</b>	Building heights reference would be contrary to Tall buildings SPD in relation to back land sites particularly along the northern edge of this character area. This needs to be rethought.
CA1.03 <b>MNF 1.17e</b>	"Refer to Figure 07 for illustrated shopfront design guidance": should this refer to Figure 44?
CA1.04 <b>MNF 1.17f:</b> <b>Request AECOM to update</b>	The following sentence needs to be reworded, ' <i>Historic facades should be preserved in every way possible, particularly through avoiding replacement uPVC windows...</i> ' The replacement of uPVC windows for more traditional materials is encouraged from a conservation perspective. This sentence reads rather counterintuitive. Reference to a ' <i>uniform colour scheme</i> ' – what colours?
CA2.01 <b>MNF 1.17g</b>	Rather than describing the rear of High Street and West Street, it would be better to add a figure to illustrate the issue rather than have a vague description in the design code.
CA4.01 <b>MNF 1.17h</b>	Does this height restriction of 2.5 storeys only apply to single new/replacement dwellings, or does this apply to new build flats? Cautious about the use of the word "must" in this code.
CA4.03 <b>MNF 1.17i:</b> <b>Request AECOM to remove</b>	This is a normal planning assessment approach. I think this should be removed, as codes like this are causing repetition and making the document look hefty and difficult to peruse.
CA4.05 <b>MNF 1.17j:</b> <b>Request AECOM to remove</b>	Any backland development would inevitably alter street pattern and density to some degree, so should all backland development be avoided? BWDG principle covers this so as CA4.03 perhaps remove to avoid repetition.
CA5.03 <b>MNF 1.17k:</b> <b>Request AECOM to update</b>	There is backland development in this character area (rear of 80 Portlock Road, rear of 17 Wellington Road, rear of Belmont Crescent and Spencers Road). Noted that this may not mean it is an established character, but there is backland development in this character area. Noted the use of the word "should" in this instance, and not "must" be avoided.

Section / Principle	Comments
CA5.04 <b>MNF 1.17l</b>	Appears to be missing.
CA6 Furze Platt (and codes from CA6.02-CA.04) <b>MNF 1.17m: Request AECOM to update</b>	This section is written very well. Although this statement - <i>Building heights should be no more than 2.5 storeys, and building typologies should reflect the immediate surrounding properties</i> , is used in several codes (can we have something generic for this statement?) furthermore, code like <b>CA6.04</b> are good but too lengthy, can we make this type of codes in points?
CA6.05 <b>NF 1.17n: Request AECOM to state "materials"</b>	'palette' of what? Materials? Colours? etc.
CA6.06 <b>MNF 1.17o</b>	“;and” not needed at the end of this code as no CA6.07. There is an unfinished sentence. ‘Victorian details’ is quite specific to a particular period, perhaps ‘original historic features, details and traditional materials’ may be more appropriate.
CA8.02 <b>MNF 1.17p: Request AECOM to update</b>	It is important to note that it applies to non-important or of poor appearance terraces. High quality patterns should be preserved.
CA8.06 <b>MNF 1.17q</b>	This could be strengthened to be “recommended to use variety of heights or architectural features etc.’ to improve sense of place.
CA8.07 <b>MNF 1.17r: Request AECOM to update</b>	“In the case of building extensions, the original building should remain the dominant element of the property regardless of the scale or number of extensions. The newly built extension ( <b>here I'd change to extension when combined</b> ) should not overwhelm the building from any given viewpoint; and”
CA9.07 <b>MNF 1.17s</b>	“Open spaces should offer a variety of uses related to the surrounding activities and buildings. Where play areas are required, these should not be <i>isolated</i> ...”
CA9.10 <b>MNF 1.17t: Request AECOM to update</b>	Biodiversity aspect should be moved from here to previous paragraph - to avoid mixing of impacts
CA9.13 <b>MNF 1.17u: Request AECOM to update</b>	“Whilst it is not expected that all trees be retained on development sites (as trees can grow with defects that make their retention undesirable),” - this part is unnecessary.
CA10.04 <b>MNF 1.17v: Request AECOM to update</b>	I think it's important to highlight that it can only be accepted if it's in keeping with wide urban grain.
CA11.05 <b>MNF 1.17w: Request AECOM to delete</b>	This looks like it is providing guidance on flood risk design. Rather than suggest flood risk approaches it is considered better to simply refer to the latest EA guidance.
Figures 128 to 131 <b>MNF 1.17x</b>	It would be useful to know where these examples are. It's unclear if these are new development examples from within the borough.

Section / Principle	Comments
Figure 134 <b>MNF 1.17y: Request AECOM to change the caption of Fig 134 to “Commercial developments”</b>	This does not appear to be an image of an industrial development.
Figure 138 <b>MNF 1.17z: Request AECOM to take all industrial areas identified in BLP policy ED2 out of the AECOM Character Areas, and label then all as “15”</b>	Is this a map of industrial character areas? This does not align with the industrial areas identified under Policy ED2 of the Borough Local Plan. The map also appears to indicate that the sewage treatment works is an industrial character area.
CA15.04 <b>MNF 1.17aa: Request AECOM to delete CA15.04</b>	<p><i>“A common material palette should be adopted and used throughout the area to provide a unified image of the industrial area.”</i></p> <p>We would disagree with this, as industrial areas should be creatively enhanced from visual perspective, instead of unified monotony - and contrary to previous and further paragraphs “Forces for change” on page 98. Stafferton Way is referred to as a successful precedent, but it has not been explained why it is successful.</p>