

RBWM EMAIL ADVISING NO TO AREA Nov 24th 2021

Ian,

I hope this email finds you well. Apologies again for the delay in getting this response back to you.

Further to your email of 20th September, thank you for sending us the draft application for the designation of the Maidenhead Neighbourhood Plan area for consideration. We have now fully considered the draft application and would like to feed back the following informal comments to you.

At the last meeting on 8th July, we discussed at length the potential for the designation of the proposed area. We asked you to further consider this designation and provide justification for the appropriateness of the area to be designated. A good starting point when considering any proposed designation is to assess whether the boundary makes sense to that community and is also logical in spatial terms.

The 'rationale' for the designation is set out within your submission. It states that within RBWM, 'there are Made Neighbourhood Plans, or designated Neighbourhood Plan areas covering all parts of the Borough, except for the Town of Maidenhead itself'. Essentially there is a 'Maidenhead shaped hole'. The submission then sets out a list of considerations as per the Locality guidance.

There is a sense when reading the submission that the area proposed is put forward because it's the area that has not yet been designated, and that if this area isn't designated, it would result in many smaller Neighbourhood Plans. However we consider that this may not be the case, as the area could logically be split into 2 or 3 areas with a smaller number of wards in each. It is noted that Planning Practice Guidance suggests that "Electoral ward boundaries can be a useful starting point for discussions on the appropriate size of a neighbourhood area; these have an average population of about 5,500 residents." (Paragraph: 033 Reference ID: 41-033-20140306).

Multiple Neighbourhood Plans are not detrimental, in fact the resultant policies could be more localised and have more of a positive impact on the communities involved. Although this may be 'impractical to resource and co-ordinate' this is not a reason to designate a large single area of some 70,000 people.

The submission refers to a number of community groups operating in the area including the football club, the civic society and the local paper, however these are not specific to this area alone. People from other designated areas would also support the football club and read the Maidenhead Advertiser, so although these networks are related to the area, they are not local enough to connect or tie the area for designation.

There is no evidence submitted which details the characteristics of the area, and how these might connect the communities that the area covers. The submission states that it 'seems unlikely that employment areas or industrial estates would be motivated to form a Neighbourhood plan group' but there is no evidence that any surveys or consultation has been undertaken to support this statement. Neither the infrastructure / physical boundaries or the area's natural setting and features have been used to justify the appropriateness of the designation.

You state that of the considerations, 'none point to a clear subdivision of the prospective area that would have an identifiable benefit in planning policy terms', however the benefits that you have identified for designating the area are very generic.

It would be useful to understand what conversations / consultation has taken place to support this designation and also where the support for this designation derives from. At present there is no evidence to suggest that the desire for this designation is being driven by the communities that it will affect. We do not get the sense that these unparished areas collectively form a community or a neighbourhood of their own. There is no clear identity that explicitly ties these communities together any more than they have with other neighbouring designated areas. If this area were to be designated, it would preclude others from coming forward with designation proposals of their own, and as of yet, it has not been confirmed to us that this is not their intention.

Our recommendation to you is to further consider splitting the area into at least 2, with 3 unparished areas in each, and to establish clear local connections supported by evidence.

Whilst we note that this area in addition to the Cox Green ward was designated in 2013, we are conscious that the planning system has radically evolved since then, and the guidance around designating Neighbourhood Plan areas is much clearer. As such, we strongly believe that designating areas should be appropriate and logical. At present, the draft proposal submitted to us is not considered to be either appropriate or logical, other than it consists of all of the unparished areas which are not yet covered by a Neighbourhood Plan.

We very much appreciate you taking the time to share the draft submission to us, however our view at this time, is that the area proposed for designation is still not appropriate. There has been no strong evidence to suggest that the boundary makes sense to the communities that it would cover, and as such we do not consider it to be logical.

We trust that this feedback is useful to you at this time. If you would like to discuss this further, please do get in touch with us.

Regards,

Rebecca Raine

Principal Policy Officer

Royal Borough of Windsor and Maidenhead