

Planning Policy  
RBWM  
Town Hall,  
St.Ives Rd.,  
Maidenhead,  
SL6 1RF

24<sup>th</sup> April 2019

Dear Sirs,

**Sunninghill & Ascot Parish Council: Response to the Borough Wide Design Guide Consultation.**

Our Parish Council welcomes the Borough Wide Design Guide as issued for Consultation. The guidance provided is generally positive and should enhance the quality of development.

In particular:

- We welcome the statement that it sits alongside made Neighbourhood Plans, and
- We support the Strategic Design Themes set out in Section 3.

We do have areas of concern, and we present these below:

**4: Design Process Expectations:**

Table 4.1 defines the design process steps.

- We welcome community engagement at the concept plan stage (step 3), but believe the devil can be in the detail and community engagement is also required at the masterplan / development brief stage (step 4) in accordance with the AS&S Neighbourhood Plan.
- Principle 4.1 only states that “medium and large developments should also provide a Concept Plan”. We consider they should be a requirement. If not provided there is no Community consultation at all on the development.
- Paragraph 4.8 only recommends that developers and designers seek the views and opinions of the local community. It should be a requirement for them to do so.
- Paragraph 4.9 only states that a statement of community engagement should be presented. Again, it should be a requirement.

The NPPF, Paragraph 128 stresses the importance of early discussions about the style and design of emerging schemes, including with the local community.

The Ascot, Sunninghill and Sunningdale Neighbourhood Plan (AS&S NP) requires community consultations, and this should be a borough wide requirement.

## **5: Character**

Although not reflected in Principle 5.1, paragraph 5.6 allows developers more flexibility in how they respond to character. It allows them to define a new and distinctive character (likely to be appropriate for larger developments).

While we are open to proposals of new and different character developers must be required to consult the community when their proposals are sufficiently developed.

## **6: Layouts:**

This section sets sound design principles on a number of key design aspects.

We find that parking provision is a regular area of concern in planning applications.

The borough parking standards are out of date, and don't respond to the high car ownership in our parish, the increasing size of cars, less thoughtful parking habits, our Victorian villages, etc. As a result developments are permitted with too little or no on-site parking. This is particular concern in Sunninghill where there is a recognized shortfall in the parking provision in the village centre and surrounding streets, but it is also wider issue.

We urge the borough to update their parking standards, reflecting the above issues, as permitted in para 105 of the NPPF, and for the design guide to set different standards in problem areas (in section 11).

## **7: Built Form**

7.1 – 7.4 and principle 7.1 encourage higher densities at sustainable locations, subject to certain conditions.

We consider the conditions are too weak.

NPPF Para 123 requires that where there is a shortage of land to meet housing needs policies should avoid homes built to low densities. 123 a) states that plans should set minimum densities for town centres and locations well served by public transport. 123 b) allows min density standards to be considered for other parts of the plan area.

Our view is that higher densities aren't required or appropriate in our parish as:

- Our parish meets / exceeds its contribution to the OAHN on the emerging BLP
- Ascot isn't a town.
- Whereas there is a train station the bus services to many of the surrounding destinations are poor and not sustainable.

NPPF paragraph 51 on allows planning controls to be tailored to local circumstances, and there is an opportunity to provide guidance specific to our area in section 11. This should include area specific guidance on density. It is accepted that higher densities may be required for genuinely affordable homes for key workers.

7.5 – 7.7 and principle 7.2 encourages a mix of uses, densities, form, sizes and tenures. Our experience is that the planners are reluctant to influence the housing types and mix proposed by developers on the grounds that they will build what the market demands and planners can't challenge this. The result is that recently permitted planning applications have delivered a high percentage of flats. This is contrary to the NPPF, emerging BLP and the design guide.

Whereas the emerging BLP provides some guidance on housing mix (Table 6 section 7.5. Meeting Housing Need) it doesn't differentiate between houses and flats. There is an opportunity in this guide to clarify percentage of houses and flats

There is a real need for genuinely affordable homes for key workers and the borough requirements / guidance need strengthening in this area.

7.16 – 7.22 and Principle 7.5 address building heights.

7.19 supports buildings of 3+ storeys in town centres, but Principle 7.5 allows heights above 3 storeys in tight urban locations such as local and town centre environments (with qualifications). This will allow heights above 4 stories in both Sunninghill and Ascot.

Principle 7.5 should be brought into line with 7.19.

Buildings above 2 1/2 stories aren't appropriate in Victorian Sunninghill. In Ascot there is a case for some 3 storey buildings and a limited number of 4 storey buildings might be acceptable in specific locations, but nothing higher.

Specific guidance on building heights should be included in Section 11, as allowed by the NPPF.

#### **8: Amenity.**

No comments

#### **9: Curtilage**

Fig 9.1 doesn't support low railings in villages, yet they are a popular feature in Sunninghill.

#### **10: Further guidance for householder developments.**

No comments

#### **11: Further Guidance for specific locations.**

The NPPF allows plans to set different standards for different areas where appropriate.

We have noted areas, above, where there is a good case for providing specific guidance for Ascot and Sunninghill.

#### **12: Further guidance for non-residential development**

No comments

Yours faithfully,

Cllr PM Deason, vice chair planning

For and on behalf of Sunninghill & Ascot Parish Council