

South West Maidenhead Development Framework Supplementary Planning Document – Consultation Statement

Appendix 2 Summary of Representations on the Draft South West Maidenhead Development Framework SPD and the Council’s response

Introduction

This appendix sets out a list of all those who made representations on the draft South West Maidenhead Development Framework SPD. It summarises the main comments made in those representations and sets out the Council’s response to those comments. Where the Council believes that it is appropriate to make a change to the SPD in response to a comment, this is highlighted as bold in the Council’s response section.

The summary of the comments is set out in the order of the different sections of the SPD, with a separate schedule for each of the main sections of the SPD. More general comments not specifically highlighted as relating to a particular paragraph of the SPD are set out at the beginning of the summaries.

List of those who made representations

Adrian Field	Dave Scarbrough on behalf of the Climate Community in Windsor and Maidenhead	K Titford	Rohan Mohindra
Alexa Culver on behalf of Environment Bank	David Grey	Katherine Platt	Roy Bloomfield
Andrew Hill	Deborah Ludford	Kathy Quin	Sandeep Mittal
Andy McCoy on behalf of Binfield Badger Group	Derek Roberts on behalf of the Rushington Area Residents Association	Katy Williams	Sarah Bowden
Ann Redgrave	Edward Hands	Kieran Phillips	Sarah Fogg
B Fidler	Edward Phillips	Lee Bradfield	Sarah Wallace
Barbara Brown	Elizabeth Chan-A-Sue	Lena Walton	Savills on behalf of Taylor Wimpey
Barry Giggins	Fiona Tattersall	Lesley Trivedi	Sibylle Luger
Barton Wilmore on behalf of Maidenhead United Football Club	Gareth Dos Santos	Lynn Bradley	Simon Bond
Beeta Ginn on behalf of National Highways	Helal and Marion Stephan	M Bajaj	Solve Planning on behalf of Elivia Homes
Bob Dulson on behalf of Maidenhead Civic Society	Helen Phillips	M Wood	Stephen Perrett
Bob Sharples on behalf of Sport England	J Earley	Mark Loader	Sue Sewell
Boyer Planning on behalf of Berkeley Homes	Jane White	Mrs M A Owens	Susan Daniel
Bray Parish Council	Jeanette Williams	Nathan Preston	Tanya Condon
Brain Ball	Jennifer Pardoe	Nick Evans	Teresa Burton
Brian Davies	Jo Faulkner	Paul and Kim Erie	Teresa Coles

Bridget Fox on behalf of Woodland Trust	Jo Holden	Paul Bradley	Thames Water
Chris Bailey	John Hudson	Paul Butt Planning Ltd on behalf of Staxlink Ltd	Tim Murphy
Claire Earl	John Lucas	Philip Manning	Timothy Lloyd
Claire Elizabeth Milne on behalf of Windsor Ascot and Maidenhead Community Land Trust	John Sewell	Rachael Piga	Tina Quadrino on behalf of Maidenhead Great Park Interest Company
Craig Thomson	John Walton	Richard Whyte	Toby Lant
Tulley Bunting Ltd on behalf of Cala Homes (Chiltern) Ltd	Woolf Bond Planning on behalf of Anita Thomas and Siobhan McElhinney	Zsofia Macho	

Summary of Representations and Council response

General Comments on the draft SPD

Summary of Representations	Council Response
GENERAL	
Object to building on Green Belt land	The South West Maidenhead Strategic Placemaking Area is one of the sites released from the Green Belt upon the adoption of the Borough Local Plan on 9 th February 2022. The Inspector’s Final Report concluded that the exceptional circumstances necessary at a strategic level to justify the release of this land from the Green Belt had been demonstrated.
The land is part of Maidenhead Heritage	<p>Policy QP1b presents a Vision specifically for South West Maidenhead which will create a sense of place and distinctiveness. This vision has been translated into a series of policy principles and requirements (Policy QP1b (5)), with further site-specific requirements included in the site proformas for AL13, AL14 and AL15.</p> <p>The Strategic Environmental Assessment identifies the Heritage assets within the Placemaking area. The provisions made within the BLP and SPD regarding the conservation of heritage assets would be expected to fully mitigate impacts through conservation and enhancement of heritage assets, such as the Scheduled Ancient Monument and Listed Buildings.</p>
The SPD forms part of a suite of documents. All relevant documents to SW Maidenhead should be listed, with order of priority. Request a diagram showing the hierarchy of all relevant documents applicable to SW Maidenhead.	Paragraph 1.1.8 to 1.1.10 of the DFSPD sets out the accompanying supporting documents and Section 3 sets out the Planning Policy Framework. The plans and supporting documents are listed in hierarchical order from National Policy (top level), through Borough Local Plan and Supplementary Planning Documents (SPDs) to other relevant RBWM Corporate strategies. This hierarchical form of listing is also reflected in the location and navigation of these documents on the Council’s website.

<p>A general and repeated comment for the SPD to use firmer / more definitive language – instead of using ‘may’ and ‘possibly’, use ‘will’ and ‘must’</p>	<p>Because the SPD is guidance and not planning policy that is set out in the Borough Local Plan, it is not always appropriate to use firmer language, as this may be construed as using the SPD to write policy.</p>
<p>Many of the requirements in the SPD have not been reflected in the Berkeley Homes Spring Hill Development application.</p>	<p>The South West Maidenhead DFSPD will carry greater weight in decision making once it is adopted. In the meantime, any applications submitted for planning permission on the allocated sites AL13, AL14 and AL15 will be assessed against relevant policies and supporting documents, as set out in Section 3 of the draft DFSPD.</p>
<p>Concern that the SPD may be introducing new policy and hence not compliant with the national Planning Practice Guidance</p>	<p>Some amendments to the wording in the draft SPD have been made to ensure that the SPD is not introducing new policy, including in relation to Housing Mix and Zero Carbon</p>
<p>RBWM has chosen the summer holidays for a major consultation, a year in which many will be abroad this summer for the first time in 3 years. Would a delay of 6 weeks not have made a more meaningful consultation without unduly delaying any development timetable.</p>	<p>Paragraph 1.1.11 explains that the public consultation was two weeks longer than required by the Regulations to reflect the fact it was being held over the summer holiday period, consistent with the Council’s Statement of Community Involvement. Public consultation events were organised in person at different venues, and online, and spaced throughout the 6 week period in order to facilitate community engagement.</p>
<p>There is no reference to the circular economy applied to the built environment in the SPD. Developers should adopt principles of design for longevity, adaptability and flexibility to ensure that built assets are fit for purpose for longer.</p>	<p>Paragraph 6.7.3 of the DFSPD highlights Policy QP1b of the BLP indicates that one of the key principles for the South West Maidenhead placemaking area is that development includes measures to reduce climate change and environmental impacts including suitable approaches to sustainable energy, recycling and construction. The circular economy is listed as one of the 4 themes of the adopted Environment and Climate Strategy.</p>
<p>Suggestion that a man made hill is created in the south east corner of the site to provide panoramic views of the surrounding area and to provide a recreational area for locals.</p>	<p>The DFSPD adds detail to the broad principles and requirements set out in the BLP, in particular, as set out in the proformas for AL13, AL14 and AL15, and also in the placemaking policy for the area, Policy QP1b. However, it does not set new policy, nor is it able to change policy in the BLP. Consequently, the introduction of a large man-made hill would not be consistent with the BLP.</p>
<p>Having this huge housing estate will cause chaos to what is already a busy built-up area</p>	<p>The SPD identifies the need to address the impacts of the development including tackling congestion and improving connectivity. Policy QP1b (c), (e) and (f) set out the need for infrastructure ahead or in tandem with development, measures to minimise the need for travel and maximise non-car transport modes, and enhancement of existing and</p>

	provision of new vehicular and non-vehicular connections the whole of the SWMSA .
The development will do nothing for Climate Change and the Council should be stopping all developments on open areas and green field sites.	Policy SP2 of the BLP requires all developments to demonstrate how they have been designed to incorporate measures to adapt to and mitigate climate change.
The DFSPD must be free from any conflict of interest and should therefore be paid for entirely with public funds, with no payments contributed by developers	There is no conflict of interest. It is common for developers to enter into planning performance agreements, including in relation to the preparation of SPDs relating to sites or areas. The PPA does not commit the local planning authority to a particular outcome but is instead a commitment to a process for progressing the SPD. It is right that the Council engages with developers as part of the process of preparing the SPD. Decisions on the content of the SPD lies solely with the Council through approval at Cabinet and the PPA does not imply any obligation on the council to approve any subsequent planning application for the proposal.
The consultation statement does fairly summarise a huge range of concerns raised by residents but fails to address many of the key concerns.	The SPD does address a wide range of issues, including those referred to in the draft consultation statement. It may not go as far as some people would like on some issues as it inevitably balances a range of competing factors, and also the content of the SPD has to work within the framework for the area set out in the Borough Local Plan.
The development is incompatible with the RBWM Corporate Plan. There remains only 3 years to achieve the 50% reduction in carbon emissions required under the RBWM Environment and Climate Strategy 2020. The SPD makes it impossible to achieve this goal (as the SEA indicates unlikely to fully mitigate the adverse impacts associated with net increases in greenhouse gases.)	Applications that are brought forward for the SWMPA will be required to comply with relevant BLP policies, including SP2, QP1b, QP2, NR1, NR2, NR3, EP1, EP2, EP3, EP4 and IF2. These policies contribute to the Council's ambition of achieving carbon emission reductions across the Borough whilst balancing the new for new housing. Ensuring that new development uses less energy, supplies energy efficiently, and incorporates renewable energy will assist, long-term, in the deliverability of this goal.
The SPD fails to map out a lawful framework for achieving the climate change goals. Climate change goals will not be met and the SPD cannot be adopted in this form. It is unlawful.	It is not the role of the SPD to do this. The SPD is intended to add detail to the broad principles and requirements set out in the Local Plan for the SWMPA. The Local Plan was examined by an independent examiner who concluded that the Local plan is sound and legally compliant. The SPD is not unlawful.
Use excess housing numbers in the BLP to reduce building in the area.	The issue of the housing target in the Local Plan, including the need for a 'buffer', has been agreed through the Local Plan process, and supported by

Do not build on AL21 and AL26, Bray Lake. This will maintain the Green Gap between Windsor and Maidenhead – better for traffic and air quality. Reduce the housing numbers on AL13 and AL15 for the same reasons.	the independent Inspector who examined the Plan. This SPD cannot re-open that issue or consider sites such as A21 and AL26 that are outside the area covered by this SPD. Similarly, this SPD cannot prescribe different housing numbers for the AL13 site, although the numbers for AL13 in the Local Plan are expressed as “approximate”. AL15 is not a housing site and hence there are no housing numbers attached to it.
Welcome the notion of distinct neighbourhoods, varied in character, well designed with a mix of housing types and quality spaces. However, concerned the SPD lacks sufficient detail to ensure some of the objectives are met.	The SPD cannot be too prescriptive but has given clear indication as the different character areas within the SWMPA and how cohesion can be achieved, particular through the presence and function of the ‘Green Spine’.
Maidenhead is in danger of becoming an urban sprawl. The beauty of Maidenhead must be protected for the benefit of all	This is recognised in ‘The Vision’ for the SWMPA, which includes protecting and enhancing the special qualities of the Borough’s built and natural environments as well as promoting sustainable development and high quality design.
A supply of housing in future will come from the business parks which can be demolished and become estates as the offices close and people continue to work from home.	This is not relevant to the matters addressed in the SWM SPD. Whilst this comment does not relate directly to any content within the SPD, it is noted that the BLP includes Protected Employment Sites, and there are no current proposals advanced to wholesale redevelopment employment sites for housing. It is therefore unlikely this suggestion will form a feasible solution to the Borough’s housing needs.
BIODIVERSITY	
The Council must be committed to whole-life net zero emissions and immediate biodiversity net gains	This commitment is reflected in Policies SP2, QP1b and NR2 of the BLP and the Interim Sustainability Position Statement, as well as the measures identified in the SPD.
Suggestion that all sites in the BLP create as many new water habitats for wildlife as possible, preserve all plant life (shrubs and trees) older than 30 years (and 60 years)	It is appropriate to consider the biodiversity requirements specific to each allocated site within the formal planning application process. Each site is individual with its own specific set of considerations and requirements, a one-size fits all approach would therefore not be appropriate.
The development will destroy wildlife	Biodiversity mitigation measures will be required and assessed through the planning application process. The Vision for the Placemaking Area includes a <i>“flourishing network of green streets and spaces which will accommodate biodiversity and people</i>

	<i>harmoniously</i> ". The BLP site proformas for AL13 and AL14 also require the conservation and enhancement of the biodiversity of the area.
There should be no development on the land to the south of Harvest Hill Road (AL13). It should instead be turned into a wildlife conservation area with some public access. The land has high wildlife value, parts of it flood seasonally, the site contains ancient oak, ash and willow trees, and the south west part, in particular, contains mature grassland.	This area is part of the housing allocation AL13 in the Local Plan. As such the principle of housing development in this area is already established. The SPD does, however, indicate that a "southern green fringe" should be retained which has the potential for biodiversity enhancement and informal recreation and ensure that development does not take place on areas prone to flooding.
The connectivity corridors need to be a meaningful width for wildlife; 3 to 5 metres with a pedestrian path in the middle is unlikely to accommodate existing protected species which currently inhabit the golf course site. Suggested the corridor should be 50 metres wide, which may not be feasible on the western boundary but should be feasible on the eastern boundary due to the sloping topography.	The planning application(s) for the golf course site will need to set out more detailed proposals for the green infrastructure including connectivity corridors, and demonstrate that they will be meaningful and achieve their objective.
Bats are present on the golf course site; they are a European Protected Species. The LPA is reminded of its Legal duties in this respect.	Ecology reports and assessment of the impact of development on Protected Species generally, not just bats, would be required and considered at planning application stage.
The development purports to be sustainable, however, no plan has been communicated to offset the carbon emissions resulting from the construction of the development site.	The draft SPD encourages developers to consider the 'whole life carbon' emissions of development.
We have a climate emergency and water authorities have declared in many areas that new developments should be stopped as there is not the water resource for them. This is particularly acute in the south-east. The development will further increase pressure on water sources, result in loss of trees and destroy ancient woodland; this is an environmental disaster.	It is recognised that the SPD area is an area of water stress. The Council's Position Statement on Sustainability and Energy Efficient Design provides guidance on designing development to be more water efficient and reduce water consumption. Amend SPD to refer to the area being one of water stress and that the opportunity should be taken to reduce water consumption and design development that is water efficient, cross referencing to the Council's Position Statement.

<p>The Thames Valley Environmental Records Centre (TVERC) Biodiversity Report (2021-05-10) identifies dozens of species on AL13 in the “protected and notable species” appendix. The SPD ought to have expressly acknowledged and discussed in detail this report in the sections on biodiversity, set out the appendices of species and addressed the impact of development on these notable protected species.</p>	<p>It is for the developers to undertake detailed ecology surveys of their application sites, including identifying protected species and identifying the impact of development on them and their proposed mitigation measures.</p>
<p>Building on an undeveloped green site is not sustainable and consequently the development cannot be carbon neutral</p>	<p>The Vision for the South West Maidenhead Strategic Placemaking Area, includes more sustainable patterns of living. Policy QP1b(5i) identifies the need for measures to reduce climate change and environmental impacts including suitable approaches to sustainable energy, recycling and construction. The objective of carbon neutral development is reflected in the Council’s Interim Sustainability Position Statement, as well as the measures identified in the SPD.</p>
<p>The proposals will result in smaller, fragmented habitats</p>	<p>The development proposals will inevitably result in the loss of some habitat, but overall development proposals will have to deliver biodiversity net gain. The Local Plan and the SPD sets out principles for delivering a green infrastructure network that will ensure ecological connectivity.</p>
<p>HOUSING</p>	
<p>There is no real clarity in the consultation as to the placement of the housing and what level of greenspace will be maintained or improved along the border of AL13.</p>	<p>The SPD provides high level design guidance and principles that planning applications should follow, but it is not intended to provide a detailed masterplan setting out the precise location of housing and greenspace – that is for the planning application stage. The Local Plan and the SPD does highlight the importance of retaining boundary planting, and this is illustrated in the framework plan within the SPD.</p>
<p>The Site Allocation Proforma (p100) states the Golf Course development is 89.93 ha to accommodate 2,600 houses, which equates to a density of 12 dwellings per acre. Berkeley Homes are proposing 20 dwellings per acre which is too excessive.</p>	<p>This planning application will be assessed on its own merits; once the SPD is adopted it will carry greater weight in decision making.</p>
<p>There is no huge demand for housing in Maidenhead, the population has only grown by 10% in the last 20 years and is slowing down further. You have already built enough to house any future growth over the next 20 years.</p>	<p>The issue of how much housing is required in the Borough has been determined through the Borough Local Plan process, and the outcome supported by an independent planning inspector who examined the Plan. It is not for the SPD to amend the housing targets in the Local Plan.</p>

<p>The SPD fails to highlight any guidance on building aesthetics and misses an opportunity to set the bar for architectural flair and individuality, which is lacking in the town centre developments. The SPD also misses the opportunity to increase significantly housing stock for families and adds to the over-flatted nature of the town</p>	<p>The SPD focuses on establishing good design principles for developers to incorporate in their planning applications to ensure high quality development. Detailed architectural considerations can be addressed at the planning application stage.</p>
<p>How many of the new dwellings will be 3 or 4 bedroom family affordable homes with gardens. These are what I have read are needed accommodation in Maidenhead to keep young families here</p>	<p>The DFSPD recognises there is an opportunity to provide a mixed community at the South West Maidenhead site whilst accommodating the 2,600 homes. The SPD provides more guidance on the housing mix, having regard to the policies in the Local Plan and supporting evidence.</p>
<p>The plan for high rise (8 storey) buildings is completely out of character with the current 2 storey neighbourhoods, this is in no way in keeping with the local residential areas. It also does not address the need for family housing that the council states is actually required. Maidenhead has a sufficient supply of flats; many of the town centre recently built flats are still vacant a considerable time after completion.</p>	<p>The Local Plan policy for the AL13 site indicates that the northern neighbourhood will be orientated towards the town centre and will make the most of its proximity to the railway station and town centre. Building heights, densities and typologies will reflect those in the town centre, but it is recognised that building heights need to be “stepped down” towards the edge of the site in areas adjacent to residential area. Further guidance on building heights is set out in the draft Building Height and Tall Building SPD.</p> <p>Amend design guidance to emphasise and illustrate the importance of building heights stepping down from centre of the site to the edge of the site adjoining residential areas</p> <p>The SPD outlines the importance of delivering family housing as part of the mix of housing on the site and as part of the affordable housing to be provided. However, the SPD would benefit from greater clarity, including linking it more closely to the evidence base, such as the Berkshire SHMA (Strategic Housing Market Assessment) which indicates that across the Borough, 55% of new dwelling should be 3 and 4 bed properties.</p> <p>Amend the Housing Mix section to link the need for family housing more closely to the evidence for family housing, and set out further evidence where necessary on housing mix (see new Appendix 3).</p>
<p>Need more smaller houses for first time buyers and older people downsizing. These two groups would like smaller properties that are</p>	<p>If the demand for these types of properties exist then developers may provide an element of them in their schemes, but these are too specific for the</p>

<p>not leasehold. Bungalows would be preferable for older residents rather than retirement flats, which have initial costs and high maintenance costs. Providing smaller freehold units for older people could free up a lot of existing properties for young families.</p>	<p>Council to require in terms of general market housing. General or retirement flats would also free up family housing.</p>
<p>The SPD should include specific housing targets for 3 and 4 bedroom homes. As well as the ratio of family homes to flats, densities should be indicated and building heights.</p>	<p>The Berkshire SHMA provides targets for 3 and 4 bedroom houses but the SPD would benefit from referring more directly to this evidence</p> <p>Amend the Housing Mix section to refer more directly to the Berkshire SHMA evidence on 3 and 4 bedroom houses.</p> <p>The ratio of family homes to flats is best addressed by reference to the Berkshire SHMA and other related evidence (see above).</p> <p>The SPD provides some broad guidance on density and design principles relating to different part of the AL13 site where different densities and typologies will prevail, but it is not necessary to prescribe detailed density guidelines in the SPD. The Building Height and Tall Building SPD addresses the specifics of building height.</p>
<p>If there has to be flats there should be a cap on the height</p>	<p>The SPD does provide some general design guidance on appropriate heights, but the maximum acceptable height at the site is a matter that is being addressed in the emerging Building Height and Tall Building SPD.</p>
<p>INFRASTRUCTURE – HIGHWAY NETWORK</p>	
<p>Do not believe the effect on traffic flow in the area of Harvest Hill has been modelled and considered correctly. No provision has been made for the significant traffic increase that 2600 new homes will bring. The only other access is via the town centre/station and this is also congested at peak times.</p>	<p>Traffic modelling has been undertaken both for the Borough Local Plan and updated for the work on this SPD. This assessed the impact of development on the traffic network in the area. A series of junction improvements are identified as being required (see section 6.6 of the SPD and Appendix 2) to mitigate the impact of the additional traffic on key junctions.</p>
<p>What incentives have been considered for residents to use green vehicles</p>	<p>The Council’s Position Statement on Sustainability and Energy Efficient Design seeks the provision of electric vehicle charging points (see section 6.7 of the SPD) and new Building Regulations means that this will become a more general requirement in the future</p>

<p>The SPD should provide guidance on ways that the area can effectively manage and reduce the number of vehicle trips for waste collection and deliveries in the access and movement section.</p>	<p>This is too specific for this SPD and would be a matter for the planning application stage. It should, however, be noted that Section 9 of the Borough Wide Design Guide SPD contains guidance on waste and recycling storage in new development.</p>
<p>The proposed access point from the end of Rushington Avenue into the site will be impossible to implement; there is a steep bank into the houses at Courtlands, and any access road or path will lead to problems.</p> <p>The junction of Rushington Avenue into the Braywick Road roundabout is already congested at peak times, and clogged up with people dropping off or picking up passengers. Adding traffic will make this junction even more dangerous.</p>	<p>This is something to be explored further as a walk/cycle access point at the planning application stage. It would improve the connectivity of the site, further encouraging walking and cycling.</p>
<p>Harvest Hill Road is not wide enough for pedestrians, bikes and cars without removing yet more hedgerows and trees. How will people be able to safely walk and cycle along here when cars already drive too fast?</p>	<p>The SPD proposes a new segregated walk/cycle route on the north side of Harvest Hill Road to enable people to walk and cycle safely in this area. Speed limits on Harvest Hill Road are likely to be lower once residential development is becoming established.</p>
<p>What is the plan to add access to Shoppenhangers Road through Courtlands/ the neighbouring care home?</p> <p>Where is the plan to improve the junction of Shoppenhangers Road and the A308? Currently all traffic for Windsor / Bracknell has to travel through the town centre adding congestion and pollution.</p>	<p>The Framework Plan in the SPD indicates that this could be a pedestrian access through, using the existing footpath. There is no intention to provide a vehicular access through here.</p> <p>There are no specific plans to improve the Shoppenhangers Road/A308 junction, but the developers for the golf course site will need to assess the impact of their proposals on that junction as part of their transport assessment accompanying their planning application.</p>
<p>How will existing access points be protected, what will the road system and parking be in the northern area? Will private vehicle parking be adequate or will we need residents parking only parking in the surrounding streets?</p> <p>What is the planned parking per dwelling, what are the planned roads within the development?</p>	<p>One of the identified overarching design principles of the development is to deliver development that is highly connected both within the development areas and to the surrounding areas, with focus on enhancing connectivity for walking, cycling and public transport. The approach to and level of parking will be determined at the planning application stage based on a number of factors including the nature of the housing, its location and design factors.</p>

<p>The Green Spine is unlikely to diminish car use to any great extent and the traffic generated by 2,600 homes, plus schools and health facility will be considerable.</p>	<p>It is important that the design of the development provides very good opportunities for people to walk and cycle, as alternatives to using the car. The green spine is an important component of achieving this. Providing facilities on site such as schools and a local centre help to “internalise trips” within the development, thereby reducing the need for people to travel further (and hence more likely use the car) and making it more likely they will walk or cycle</p>
<p>It is noted further SPD documents will be produced to support the BLP and impact the allocations within the draft SWMSPD. Of particular interest will be the new parking SPD as it is identified that one of the biggest opportunities for managing down traffic demand on the Strategic Road Network (SRN) is associated with limiting parking spaces at a destination. This is particularly successful when guidance such as this is supported by the delivery of other sustainable transport measures and infrastructure, which are substantial in the draft SWMSPD.</p>	<p>Noted. A Parking SPD is in the process of being produced.</p>
<p>It is observed that now the footbridge over the A308(M) connecting AL13 and AL14 is no longer the preferred option, we look forward to reviewing the proposed alternative design to be included at the Braywick Road roundabout junction with the A308(M). The potential impact on the operation of the junction with the addition of further facilities is highlighted.</p> <p>The impact of the upgrade of the Harvest Hill Road / Braywick Road junction on the SRN is also noted, and a request made to be consulted for any design / modelling if there is to be interaction between the two junctions.</p>	<p>Noted</p>
<p>INFRASTRUCTURE – COMMUNITY</p>	
<p>Health and Wellbeing: What are the plans for the Borough to ensure that there will be adequate health provision given the proposed scale of the development in Maidenhead, including South West Maidenhead?</p>	<p>The SPD indicates that consideration is being given for a health hub on the site to meet the needs of the development. It may also help to help improve primary health care for a wider area, subject to the views of the health providers.</p>

<p>The golf club land provides a leisure facility that should not be destroyed; it was given by Lord Desborough to the local people for outdoor recreation</p>	<p>The principle of the development has been established by the BLP. The Inspector’s Final report for the BLP considered the arguments of the loss of the golf club as a leisure facility / green lung and concluded that the development of this land would not result in an actual loss of open space useable by the general public.</p>
<p>There is already insufficient local Infrastructure to support the population, doctors, dentists, etc. This will only be made worse. The recycling centre frequently smells, especially in hot weather.</p>	<p>The SPD includes a detailed section on infrastructure provision and Appendix 2 of the SPD sets out a more detailed infrastructure schedule. The local centre on the housing site will also provide new local facilities to support the new housing and this may include a health hub.</p>
<p>The left hand turn only from Shoppenhangers Road to Braywick Road should be changed to turn right hand only as when the development is built it will cause a bottleneck into the town centre and cause a highway hazard.</p>	<p>The developers for the golf course site will need to assess the impact of their proposals on that junction as part of their transport assessment accompanying their planning application. There is a risk that introducing a right turn at this junction will lead to additional delays on the Braywick Road, as it would reduce the ‘green time’ at the traffic lights to allow the additional right turn movements.</p>
<p>There is no need for a new secondary school</p>	<p>The Borough Local Plan policy indicates that both a primary and secondary school should be provided. Whilst there is not a need for an additional secondary school at the moment, pupils generated from development in South West Maidenhead and other developments across Maidenhead will mean that it is needed towards the end of the period that the Local Plan covers (i.e., up to 2033).</p> <p>Provide further information on education provision in a new appendix (Appendix 4)</p>
<p>ENVIRONMENT</p>	
<p>Who will be responsible for maintaining the greenspace? What protections are in place to ensure the borders will not be reduced?</p>	<p>This is a detailed matter to be determined at the planning application stage.</p>
<p>Where are the plans to add trees along Braywick Road to provide shade, absorb pollution, make walking/cycling more pleasant to encourage people to walk and not drive into the town centre?</p>	<p>The Local Plan and the SPD sets out a range of plans to improve walking and cycling provision both within the development areas, but also improving wider links – this includes links to the town centre. The SPD also seeks theretention and enhancing of boundary trees and landscape buffers.</p>

<p>What measures are proposed to reduce noise and air pollution from increased traffic</p>	<p>Planning applications will need to consider the need for any mitigation measures to ensure they create satisfactory living environments for new residents, in relation to noise and air pollution. The Local Plan and SPD set out a series of sustainable travel measures to help reduce reliance on the car, although it is recognised that there will still be increased traffic associated with the development. Over time air pollution linked to cars will reduce with the introduction of more electric cars and continued improved emission standards from existing petrol and diesel cars.</p>
<p>There is an over reliance on the use of public transport and active travel to mitigate the dreadful impact on air pollution by this development. There is no evidence that people will start using this more in the borough and indeed there is no actual plan to improve accessibility to these modes of transport.</p>	<p>It is important that public transport and active travel measures are integral to the new development and are connected to wider walking, cycling and public transport networks. The proposals set out in the Local Plan and elaborated on in the SPD will ensure that new residents and workers in the SW Maidenhead development areas will have better access to these modes of transport.</p>
<p>The golf club land is an important green space which helps to reduce the air quality problems in the area. Building on this land will add to pollution, not reduce it</p>	<p>The principle of the development has been established by the BLP. The SPD highlights that the Sustainability Appraisal (SA) for the BLP found that whilst there might be a minor negative impact on air and noise pollution, the promotion of non-car travel would help reduce transport related emissions.</p>
<p>EXISTING RESIDENTS IMPACT</p>	
<p>How will impacts on existing residents, through noise dust and congestion, be managed during construction?</p>	<p>Where appropriate, conditions are imposed on the development to help manage these issues during the construction period, using relevant powers available to the authority.</p> <p>Developers are encouraged to join the “Considerate Constructor scheme”.</p>
<p>Will existing residents on Rushington Avenue whose homes are adjacent to the golf course have their views and privacy protected?</p>	<p>Impacts on the residential amenities of existing properties will be considered during the planning application process.</p>

Section 1 Introduction

Paragraph Number	Summary of Representations	Council Response
1	Include information regarding who has funded the SPD and consultation process and by how much	This is not relevant to the content of the SPD. The Cabinet report accompanying the final SPD for adoption sets this out.
1.1.1	The area is referred to at this paragraph, and throughout the draft SPD, as SWMSPA. In the BLP it was referred to as SWMPA. Consider it helpful if the various references in the SPD were consistent with the BLP.	It is considered that the abbreviation SWMSPA for South West Maidenhead Strategic Placemaking Area is suitable clear and is used consistently throughout the SPD.
1.1.3	This plan has not taken into consideration all of the elements highlighted in this paragraph. Local infrastructure, water supply, sewerage and air quality will all be stressed. Consultation with the community is a falsehood with the majority of the current residents of Maidenhead vehemently opposed to this level of development, and in particular any development on the golf course.	The SPD includes a wide range of considerations into account, although water infrastructure was not included in the draft SPD but should be included. It is recognised that there is much local opposition to the development but the principle of development has been established through the Local Plan. Add section regarding water infrastructure.
1.1.5	Update to make clear that comments will be taken into account before the document is finalised	Agree that this needs to be made clear but better done in the section on community engagement Amend Section 2 to make clear the document has been amended to take account of comments where appropriate
1.1.6	How will the timely delivery of new infrastructure required to support the development be achieved? Please share the plans	The infrastructure section of the SPD provides more detail on infrastructure delivery and provides some guidance in relation to priorities in terms of delivery. The detail of timing will be developed through individual legal agreements linked to planning permissions and through the collection of funding through the Community

		Infrastructure Levy and planning legal agreements (section 106 agreements).
1.1.15 Strategic Environmental Assessment (SEA)	Pg 3 of this document states Lepus prepared the report for the use of Buckinghamshire Council. If this is factually correct then why is RBWM using it and if this is an error it begs the question how many other fundamental errors have been made in this document.	This is not correct; the Environmental Report has been prepared on behalf of RBWM. It appraises the Draft South West Maidenhead Development Framework Supplementary Planning Document. The Post-Adoption Statement will note this error.
1.1.15 (SEA)	Disagree with the statement at p.11, N16, that the SPD has the potential to deliver enhanced multi-functional GI and biodiversity net gain	The development will be required as a matter of policy, and soon to be law, to deliver biodiversity net gain. Policy also requires delivery of green infrastructure network.
1.1.15 (SEA)	This is a strategic environmental assessment and as such I expect it to provide real measures that have to be implemented in order to meet the current regulations and ensure the borough can meet its environmental targets.	The SEA Directive's objectives are to provide a high level of protection to the environment and contribute to integrating environmental considerations into the preparation, adoption and implementation of plans and programmes to promote sustainable development. If 'real measures' are provided by the plan maker, the SEA process will appraise them. It is not for the SEA process to provide 'real measures' although it may make recommendations.
1.1.15 (SEA)	Please explain how Lepus came to the conclusion that this development will rule out residual adverse effects in relation to: <ul style="list-style-type: none"> - biodiversity - air quality - water provision / consumption 	See Table 6.2 of the Environmental Report on page 61.
1.1.15 (SEA)	Surprised the HRA concluded that there would be no adverse effects on any Natura 2000 sites as a result of the BLP. Please provide copies of the HRA assessment.	The final HRA produced for the BLP is ref. PS/043 (March 2020). This concluded that the BLP in isolation would have no likely significant effect on the Natura 2000 sites. The BLP Inspector confirmed in paragraph 15 of her final report (ID-34) that the BLP "will not give rise to an adverse effect upon the integrity of any relevant sites, either alone or in combination with other plans or projects".
1.1.15 (SEA)	This assessment has been carried out without a visit to the area in question. It is preposterous that an assessment of a development of this scale, that will irrevocably impact the lives	The site has been visited in the past by Lepus team members working on the BLP. The nature of SEA is such that the process is strategic and high level. Site based evaluation is rarely undertaken since the process relies principally on secondary data, much of which is

	of everyone living in Maidenhead, can take place via desk top research.	obtained over longer periods of time. The SEA is only as good as the data available to it. However, it should be noted that SEA is also ‘top’ of the assessment sequencing hierarchy, with the next step being EIA. The EIA process will include many site visits and collect ‘real time data’ at the site scale to inform the EIA.
1.1.15 (SEA)	Welcome the recommendations in Table 6.4 but suggest they do not go far enough. Request the “responsible authority” provides details of all the monitoring that has been undertaken as part of its environment and climate strategy that was adopted in December 2020.	This SEA is not intended to report on the monitoring of the Environment and Climate Change Strategy. Updates on the delivery of the Environment and Climate Change Strategy can be found on the Council’s website .

Section 2 Community and Stakeholder Engagement

Paragraph Number	Summary of Representations	Council Response
2	The fundamental principle of taking the golf course out of the green belt and releasing it for housing development was never discussed at a community level. The community was unable to affect that decision, nor the amount of development required.	The decision to take the golf course out of the green belt was part of the Local Plan process which was subject to extensive public consultation.
2	It is disingenuous to state that this was community engagement given that this was simply telling the community what has already been done. There has been no indication at any of the events that anything would be amended based on community opinion.	The issues raised during the early community engagement helped to shape the preparation of the draft SPD. Further changes to the document have been made following the consultation on the draft SPD.
2.2.1	The community is very concerned about selling off woodlands and greenspaces when we are facing a climate, biodiversity and mental health crisis. The development is not going to benefit the people of Maidenhead. It will degrade our quality of life and our ability to adapt to the effects of climate change. Losing our green lungs will	Development in the area will provide new homes, including affordable homes, and new jobs in the town. The Local Plan policies and this SPD will help to ensure that environmental impacts are properly addressed, including ensuring that there is a strong green infrastructure framework to the new development, biodiversity net

	make air pollution worse. This is going to dramatically affect the health of our community.	gain is secured and good sustainable travel options are available for new residents and workers.
2.2.1	The SPD does not address the environmental concerns raised as a consequence of the DFSPD Engagement. It also does not address the lack of infrastructure to support the development, increased traffic volumes and more green space for mental health.	The Local Plan policy and the SPD seeks to address all of these concerns, by setting out a framework for securing development with high quality design standards, a strong green infrastructure framework, and sustainable travel measures embedded into the developments and connected to the wider network. A section of the SPD is dedicated to infrastructure, setting out the measures that are necessary and their costs, together with mechanisms to secure the necessary funding to deliver those measures.

Section 3 Planning Policy Framework

Paragraph Number	Summary of Representations	Council Response
3.2	<p>Berkeley Homes have recently submitted an application for 214 dwellings south of Harvest Hill Road yet there does not appear to be a plan in place yet for improving the eastern end of Harvest Hill Road for safe vehicular, cycle and pedestrian traffic movements. When will this be in place?</p> <p>The Berkeley Homes application does not appear to address green infrastructure, biodiversity and net gain or measures to reduce climate change and environmental impacts</p>	<p>The design section of the SPD (in section 6) sets out an approach to addressing Harvest Hill Road, recognising it as a key corridor in the new development. It includes proposals for a new walk/cycle route along its length providing a safe route for pedestrians and cyclists. The character of this corridor will change as new development comes forward. Traffic speeds will be reduced.</p> <p>The Berkeley Homes application will need to be assessed against the policies in the Local Plan and have regard to the SPD which will be a material consideration in determining that application.</p>
3.2.3	<p>The text in the table at 3.2.3 is not consistent with BLP. The word “need” should be omitted as this was not referenced in the BLP. Suggest instead the table acknowledges “not all of the site will be developed for employment”. Removal of the word need will ensure</p>	<p>Agree the word “need” does not appear in the relevant Local Plan policy.</p> <p>Amend to remove the word “need” from the Table re site AL14</p>

	that the importance of the Triangle Site in addressing the borough's requirements for employment space is not constrained by the text of the SPD, given the flexibility within the Local Plan itself.	
3.2.3	The table states that the use of site ref. AL15 (Braywick Park) is "Strategic Green Infrastructure". This is not fully consistent with the description contained in the Site Allocation Proforma AL15 at Appendix C of the BLP, which defines the allocation as: "A mixed use Strategic Green Infrastructure site to serve Maidenhead..." For consistency recommend the table under 3.2.3 is amended to refer to 'a mixed use Strategic Green Infrastructure'. Also suggest the table at 3.2.3 is amended with: "...and provision of a range of sporting facilities (indoor and outdoor)."	Agreed that AL15 refers to wider uses Amend uses referred to in the table relating to AL15 to reflect the wider uses set out in the Policy for the site
3.2.8	It is noted the traffic impact modelling is based on the BLP submission. Confirm that as and when individual planning applications come forward the modelling will be reviewed, however, paragraph 3.2.8 of the draft SPD states: "the priority (across RBWM) should be to deliver smaller 'flexible' units..." This change in employment type for AL14 is likely to impact the level of trips and distribution through the network. National Highways advise, where flexible industrial, office and warehousing is proposed they would expect the 'worst case' scenario in terms of potential trips to be modelled and form part of any planning application submissions for AL14.	Noted. This is a matter for the transport assessment submitted by developers at the planning application stage to address.
3.2.8	Given the limited availability of sites for employment space the text of the SPD should not seek to impose restriction on sizes of units beyond that provided within the policy. As the policy states that larger units are appropriate, the word 'will' in the last sentence of paragraph 3.2.8 must be replaced with 'should' thereby ensuring consistency.	Noted. Amend the text to accurately reflect the Local Plan policy (ED1)
3.2.10 & 4.9.1	Mention should be made of the site provisions, conditions and restrictions applied to mineral extraction – dust control, working	This is not necessary. There is no proposal for mineral extraction at this stage, only a requirement to undertaken an assessment of the viability and practicality of prior extraction of minerals. Policies in the

	hours, etc. Also, time scale and limits before mineral extraction must cease	new Minerals and Waste Local Plan would be applied should any such proposals come forward.
3.3.2	When will the tall buildings SPD published for consultation and adopted?	It was published for consultation at the end of August 2022. We hope to adopt the SPD as soon as possible in 2023.
3.4	This section mentions several policies, both adopted and draft, that cannot be implemented if this SPD is developed as written.	Development in the SW Maidenhead should contribute towards delivering a number of the policies and strategies in this section.
3.4.1	The development is incompatible with RBWM's Climate and Environment Strategy which highlights the value of greenspace and trees for climate change mitigation.	The Local Plan policy and the SPD highlight the importance of a strong green infrastructure framework for any development. Whilst it is recognised there will be some tree loss, significant new tree planting will also be necessary and biodiversity net gain secured.
3.4.1	Reference made to "Position Statement on Sustainability and Energy Efficient Design". The Council advise this is an 'interim' position statement pending adoption of a Sustainability and Climate Change SPD. As a 'statement' this does not have the weight of an SPD and this should be made clear.	It is a matter for the decision taker the weight to be attached to this statement. It is clearly that it is not an SPD.
3.4.2	Does the Council have a Biodiversity Action Plan?	A Biodiversity Action Plan is being prepared and is expected to be adopted shortly

Section 4 Area Analysis

Paragraph Number	Summary of Representations	Council Response
4.1.2	Statement is out of date; the plan has not been updated to accommodate climate change emergency, pandemic legacy, heatwaves, pollution and water shortages that has happened in the interim. The only way to meet these is to evolve the plans to remove the golf course land from the development.	The site is allocated in the Local Plan following an extensive public examination by an independent planning inspector, who considered all the relevant evidence. The Plan was only adopted in February 2022. The SPD cannot "de-allocate" the site and hence remove the site from development.
4.2	Braywick Park and Ockwells Park are separated from the development area by motorways and dual carriageways and access	There remains significant green spaces at both these locations but it is recognised that it is important to improve pedestrian and cycle

	will only be granted from a few key places, and not accessible for wildlife. Braywick Park will lose a large area of its green space to a huge new football stadium and associated car parking and has already lost a significant proportion of green space to a new leisure centre and car parking. The accessible green spaces will not be as significant as suggested in the SPD.	connections to both Braywick Park and Ockwells Park as open space and recreation/leisure destinations. These improvements are part of the infrastructure package.
4.2.2	There is an inaccurate assessment of the existing context in the northern section of the site. The buildings here are 2 storey and elevated on a prominent hill. The proposed buildings should therefore not be above 3 storeys in height. 8 storey high density buildings to the north of the site ignores the local context of surrounding developments, a green leafy low density suburb.	This assessment of the context has been re-drafted to more accurately reflect the scale of development in the northern section of the site.
4.2.2	Braywick Park is no longer a significant area of open space as at least a third of it has already been lost to development (leisure centre, car park and school) and more is going to be lost when the football ground is moved to Braywick.	It remains an important open space but also an important leisure/recreation destination
4.2.2	Suggested wording to distinguish between the different character of the green spaces at Ockwells Park and Braywick Park: “Ockwells Park is located to the south-west of the SWMSPA and forms a significant green open space. Braywick Park, which is located to the east of the SWMSPA, accommodates a number of uses and buildings (including indoor and outdoor sports, food/drink and education) and forms a significant sports and recreation hub.”	This more detailed explanation is not necessary for what is intended to be a very brief overview.
4.2	The assessment of the building heights is wrong but also the SPD makes no reference to the topography of this part of the site. There is no evidence on the impact of the long distance views.	Agree that the description should refer to topography. Amend 4.2.2 to refer to the land falling away south of the golf course
4.3	Triangle Warehousing Site should remain green; it floods and is unsuitable for warehousing. Access to this site will be problematic as large vehicles visiting the site can only use the Braywick roundabout. The A330 in Holyport is narrow and cannot accommodate large vehicles.	The site is allocated for industrial and warehousing development in the Local Plan – as such the principle of development is established. The flood risk issues were fully considered as part of the decision to allocate the site in the Local Plan. Similarly the suitability of the site from a highway perspective would also have been considered.

4.3	<p>The character of Maidenhead will be irrevocably changed by the scale this proposed development.</p> <p>This section needs to be changes to reflect how this development will irrevocably change the current landscape, character and views of Maidenhead to one that is much less green and leafy.</p>	<p>This section is an overview of what the area is like at the moment. It is recognised that its character will change as a result of development but the aim is to secure high quality development in the area, based on a strong green infrastructure framework</p>
4.4.2	<p>Ecology AL13 and 14: +10% in the same area should be a prerequisite and mandatory for developers with immediate effect not in 20+ years time. Lack of information with regards to what will happen to existing wildlife.</p>	<p>The DFSPD states that biodiversity mitigation measures will be required and assessed through the planning application process. Section 3 of the DFSPD identifies the relevant planning policies which any application would be assessed against include QP1b, NR2 and the Site Allocation Proforma for AL13 which include biodiversity measures.</p> <p>Monitoring Indicator 9 of the BLP identifies the target that all developments to result in biodiversity net gain (at least 10%)</p>
4.4.2	<p>Only at risk flora and fauna to be considered but no mention of mandatory way of finding and protecting these areas.</p> <p>There is no mention of how the negative impact on wildlife areas elsewhere will be identified and addressed.</p>	<p>Detailed ecological surveys will be required to accompany planning application and appropriate mitigation measures will need to be identified and implemented by the developers. Applications will need to demonstrate biodiversity net gain.</p>
4.4	<p>More detail is required here to provide reassurance. What will be required and how will the planning process make sure that mitigation stays in Maidenhead and indeed within the borough.</p>	<p>See response above. Section 6.7 of the SPD sets out the approach to securing biodiversity net gain and makes clear that biodiversity mitigation and net gain should be focused on the area covered by the SPD, and if necessary on land outside but near to the SPD area, and certainly within the Borough.</p>
4.5	<p>Many of the trees on the golf course are not protected and consequently significant numbers of matures trees must be at risk. Development right up to Rushington Copse will prejudice the survival of these ancient trees. Recommended that more trees across the site are protected, including most of the land within AL13 that lies to the south of Harvest Hill Road and a copse on the Triangle site.</p>	<p>It is not the function of the DFSPD to identify the full extent and number of TPO trees within the development site. The scale of woodland and TPO trees is described without requiring detail. The impact of development on specific trees/ groups of trees would be considered at application stage.</p>
4.5	<p>No clarity as to what trees will be lost and the associated impact on wildlife. There is no mandatory requirement on developers to ensure development will be sufficiently distant from trees to ensure their long-term survival.</p>	<p>Detailed Tree Surveys and Tree Protection Plans would be required at planning application stage.</p>

4.5	All TPO trees need to be retained	Generally TPO trees should be retained. Occasionally there may be very good planning and design reasons to not retain trees. This would need to be fully justified and there would need to be replacement planting.
4.5.1	Will RBWM be conducting a survey to assign TPOs as this land is being transferred to the developer? Under 4.5.1 suggest adding after “there are several large TPO areas that cover most of the land within AL13 that lies to the south of Harvest Hill Road” the words “RBWM will additionally undertake a survey of all the trees and plants at Maidenhead Golf Course to identify all trees and plants that require TPO to be imposed on.”	Detailed tree surveys will be required by the developer for the golf course land, as indeed they will be required for other areas of development within the SW Maidenhead area It is not for the SPD to determine the approach to the use of TPOs
4.5.1	Note that there is a line of trees with TPOs running along the border of where the five houses on Oaklands Grove (SL6 2EQ) meets the south-east edge of the proposed development area. This area should be marked out on the 'Illustrative Framework Plan' (6.2.2) map as style "9" (<i>Retained existing and new planting along the rear of neighbouring properties</i>) - currently this is missing from the map . This would be consistent with the markup of the trees at the rear of the houses on the west-side of Walker Road that is shown to be protecting/saving their treeline.	The Illustrative Framework Plan is a high level plan – it is not intended to show all the detail but to illustrate principles.
4.5.1	Reference is made to several large TPO areas that cover most of the land within AL13 that lies to the south of Harvest Hill Road. Aware of two TPO’s that relate to individual trees; not aware of ‘most’ of the land that lies within AL13 south of Harvest Hill Road being covered by TPO.	The areas referred to are covered by area TPOs.
4.5.2 & 4.13.1 Figure 3	The draft SPD suggests that the tree clump on The Triangle Site has the “potential to be categorized as ancient woodland”. Whilst it then indicates this will be investigated further, figure 3 (p19) infers it is Ancient Woodland. The landowners of the site have commissioned a specialist consultancy (Sylvan) to assess whether the clump on the Triangle Site fulfils the criteria for classifying the site as Ancient Woodland.	Natural England currently maintain an Ancient Woodland Inventory which identifies and maps the extent of ancient woodland nationally. The site referred to in the SPD as “the clump” is identified on the Ancient Woodland Inventory as ancient woodland. This is the factual position. Amend text to state the factual position that the tree clump is identified as ancient woodland on the Ancient Woodland Inventory

	The report concluded it does not, and as such, the clump must not be referred to as ancient woodland in the SPD.	
4.6	No mention under Conservation and Heritage as to the history of the golf course	We are not aware of any designated heritage assets on the golf course, which is what this section is summarising.
4.7.2 & 4.13.4	The current 40mph speed limit along Harvest Hill Road is too fast and often exceeded, there is no footpath in many places, crossing the road is very dangerous as there is no footpath and no street lighting. Implementing the development plan changes as soon as possible would be well received by local residents. A reduction in speed limits will make it safer and quieter, installation of roundabouts, footpaths, cycle track and lighting will provide pedestrians and cyclists immediate benefits.	Noted and welcomed.
4.7.2	No detail on how traffic will be managed. Existing roads are heavily utilised and assessment of traffic increase looks very small for an additional 2,600 dwellings plus business transport. The suggestion of a cycle lane and potentially a bus lane will add further to congestion and goals of a major percentage of movement being on foot or bicycle seem exaggerated and need to be scientifically assessed.	The SPD sets out a range of traffic and transport measures to manage the traffic such, including a range of junctions that will need improving and guidance on the approach to Harvest Hill Road which will change in character as new development comes forward. New walking/cycling routes will be segregated from the main highway carriageway wherever possible, such as those alongside Harvest Hill Road and along the green spine through the housing development, so they should not add to traffic congestion.
4.7.2	The northern part of the SWMPA adjoins Maidenhead Town Centre Air Quality Management Area (AQMA). Have you quantified the increased traffic and congestion that will result, with the impact on air quality and the health of residents? How can this be mitigated? What are the detailed proposals?	Additional traffic modelling has been undertaken to inform the infrastructure package set out in the SPD. More detailed transport assessments will be undertaken at the individual planning application stage that will quantify traffic congestion and set out proposed mitigation. The package of sustainable travel measures identified in the Local Plan and the SPD will assist in mitigating impacts.
4.8	The Flood map shows some areas in Flood Zone 2 on the land to the south of Harvest Hill Road. The lower part of these fields flood regularly in winter, and increasing the impermeability of the golf course plus removing mature trees will exacerbate this. The lower lying area more prone to flooding should therefore not be developed.	The Local Plan proforma for the AL13 site requires this to be considered through a flood risk assessment to accompany planning applications.

4.8	Concern that the removal of green space and increase of hard surfaces will lead to the amount of run-off exceeding the capacity of the drainage system and lead to flooding of homes (which historically have flooded). What are the Borough's plans to ensure this does not happen?	The Local Plan requires that development proposals will need to demonstrate the sustainable management of surface water runoff through the use of sustainable drainage systems. This will need to be addressed by developers at the planning application stage.
4.8	A request was made that the following text be added with regards to surface water drainage: <i>"It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding."</i>	The SPD contains a section on water infrastructure and this cross refers to Policy IF7 in the BLP. It adds that developers should contact the water/wastewater company at the earliest opportunity to discuss their development proposals. As such, it is considered that it is unnecessary to include the suggested text in the SPD.
4.8	Braywick Park now floods behind the new leisure centre demonstrating the flood risk in this part of Maidenhead. Not only does this section fail to address flood risk management with AL13 and AL14 (where AL14 already has a major flood area by the M4 slip road) but additionally fails to record any figures regarding likely significant increase risk with the loss of a major part of AL13 grassland and tree cover which currently absorbs rainwater.	This section of the SPD is highlighting the constraints. Section 6.7 of the SPD considers this further and the Local Plan proformas for the development sites address flood risk further, including the need for more detailed flood risk assessments at the planning application stage.
4.8.1.	Would like to see the calculations for the sequential test and would also like to understand what is meant by "no sites at lower risk are reasonably available".	The sequential test was undertaken as part of the evidence to inform the allocation of the site in the Local Plan. The SPD provides a footnote to the sequential test report.
4.8.2	The penultimate and last sentence of this paragraph can be omitted given the acceptability of the site for employment uses; the NPPF identifies employment uses in flood zones 1, 2 and 3a as less vulnerable.	The developer will need to undertake a flood risk assessment to determine the ultimate developable area of the site, even though the principle of industrial and warehousing development as a whole is accepted through the Local Plan allocation. However, it is accepted that these two sentences are not necessary in a section that is summarising the nature of the flood risk on the site. Delete last two sentences of paragraph 4.8.2

4.9.1	The site lies within a mineral safeguarding area. The negative impact noted in the SEA on minerals is not similarly noted or resolved in the SPD. How long will extraction take and what are the consequences for infrastructure delivery?	Section 3 of the SPD explains that the purpose of the minerals safeguarding area is for an assessment to be undertaken of the assess the viability and practicality of mineral extraction. If any extraction is considered appropriate, matters of timing and infrastructure implications would be considered at that stage.
	The SPD has not investigated and set out a strategy for mineral extraction and sewer infrastructure	See response above re mineral extraction. Re sewer infrastructure, this is a matter for the developers to liaise with Thames Water. However, it would be helpful to provide some high level guidance and signposting to policy on water infrastructure. Add short section on water infrastructure in section 6.7
4.9.1	The SPD is misleading where risks to future food supplies are concerned, stating most of the land is classed as Grade 4 agricultural land, but contains no reference to Grade 3 investigations	The Council produced a note for the Inspector as part of the BLP Examination (RBWM_062) explaining why Grade 3a Agricultural Land was not included in the site selection process. When undertaking this work in 2019, the Council found that the available GIS data did not differentiate between Grades 3a (good quality) and 3b (moderate quality). The Inspector accepted that this approach was proportionate and appropriate.
4.10	Doctors' surgeries in Maidenhead are already under extreme pressure; new medical facilities should be provided to meet the needs of new residents, not just relocating an existing surgery to the site, moving services further away from existing residents.	The SPD sets out proposals for including a health hub as part of the local centre. This would meet the needs of new residents of the development, as well as potential involving relocation of existing facilities, subject to further consideration by health providers.
4.10	The Green Lane allotments are located a long way from the south of the development site. Allotments are already much sought after in and the South West Maidenhead area should provide its own allotments for local residents. This will also help in keeping some biodiversity on site.	The Local Plan proforma for the site indicates that the infrastructure provided on the AL13 site should be capable of accommodating food production. Section 6.7 of the SPD highlights this and suggests different forms of food production that could be provided, including food production.
4.10.2	This paragraph is not supported by any meaningful evidence base and as such must be removed.	This paragraph is based on discussions with health providers both as part of preparing the infrastructure delivery plan for the Local Plan and subsequent discussions as part of preparing this SPD.
4.11	Pressure on existing facilities such as water, sewage, energy, etc; commitments must be secured from suppliers to increase provision in advance of the new development not once problems arise.	Key suppliers (eg Thames Water) have been consulted as part of the preparation of this SPD. The Local Plan requires necessary

		infrastructure to be provided in advance or in tandem with development.
4.11	A water usage target should be mandated in the draft planning document and it should also mandate the installation of water butts on the new development.	It is not the role of this SPD to mandate targets such as this. However it would be helpful to refer to guidance on more efficient use of water/reduction in water consumption. Add reference in section 6.7 to the guidance in the Council's Position Statement on Sustainability and Energy Efficient Design regarding water efficiency measures
4.11	Thames Water acknowledges upgrades to infrastructure in Southwest Maidenhead will be required after 2025, which is the period in which most development is set to take place. Without upgrades the system is likely to become overwhelmed. This SPD is an opportunity to coordinate the upgrades, however, section 7.2 does not consider utilities. This should be addressed.	The Local Plan Infrastructure section sets out policies in some detail in relation to utilities, notably water infrastructure, although it would be helpful to signpost this from the SPD. Add additional text in relation to water infrastructure in section 6.7
4.11	The SPD relies on old evidence, why has this not been updated with the latest evidence on climate change? Little attention given to more frequent droughts. There is no evidence on water sustainability.	It is recognised that this is an area of water stress Add additional text in relation to water infrastructure in section 6.7, and signpost to the Council's Position Statement re Energy Efficiency and Design regarding water efficiency measures
4.11	There is no mention here about the provision of clean water for this development. Is water supply covered in the "Statement of Common Ground in 2020" signed by the Council and Thames Water, and has it been revisited in light of more recent projections for sustained water storages in this area?	See above responses re water infrastructure. The Statement of Common Ground was specifically for the Local Plan process. There is no need to revisit it but the Council has engaged with Thames Water on this SPD and will continue to do so through the planning process. However developers will also need to work closely with Thames Water to ensure there is adequate water supply and sewerage provision.
4.11	Paragraph 4.11 remains valid, but state it should also be taken into account the timescales involved in providing new wastewater infrastructure (18 months to 5 years). It is therefore vital the Council and Developers work alongside Thames Water so they can build up a detailed picture of what is being built where, get	Noted and agreed. The proposed text is already addressed in Local Plan policy IF7 but it would be helpful to refer to this in the SPD

	confidence of when that development is going to start and what the phasing will be. Request developers engage with Thames Water at the earliest opportunity. Additional text recommend.	Add section re water infrastructure, including a cross reference to Policy IF7.
4.11	Additional text requested as follows: <i>“When considering sensitive development, such as residential uses, close to the Sewerage Treatment Works, a technical assessment should be undertaken in consultation with Thames Water. The technical assessment should confirm that either: (a) there is no adverse amenity impact on future occupiers of the proposed development, or; (b) the development can be conditioned and mitigated to ensure that any potential adverse amenity impact is avoided.”</i>	The Local Plan already sets out a range of environmental protection policies that cover matters such as air pollution, noise and odour. These detailed technical assessments can be addressed in discussions with developers and assessed against the relevant Local Plan policies.
4.11	Thames water support the mains water consumption target of 110 litres per head per day as set out in the NPPG and support the inclusion of this requirement in the policy. In order to achieve this the following text is recommended: <i>“Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption) using the ‘Fittings Approach’ in Table 2.2. of Part G of Building Regulations. Planning conditions will be applied to new residential development to ensure that the new water efficiency standards are met.”</i>	As noted in earlier responses, it is recognised that the placemaking area is in an area of water stress. Whilst it is not for the SPD to set new water efficiency targets, it is appropriate to refer developers to guidance in the Council’s Position Statement on Sustainability. Add reference to the guidance in the Council’s Position Statement on Sustainability on water efficiency
4.11.3	Suggested wording: “New fibre optic/latest technology cabling will be provided to all new and existing properties in the South West Maidenhead area to offer improved data speeds to everyone.”	This is a matter for broadband providers, working with the developers, to deliver.
4.12	Noise and air quality issues could both be improved by protecting all the mature trees currently on the site. Noise from air source heat pumps could be an issue	Section 6.7 of the SPD sets out the approach to trees. The sustainable travel measures outlined in the SPD combined with improving environmental standards such as the introduction of electric vehicles will help reduce air pollution over time.

4.12	The reference to “vibration” should be omitted as it does not add any further detail that that in the BLP.	Agreed Agreed – remove vibration from the title of this section and the content page
4.12	Areas in Maidenhead exceeded the WHO target for safe air quality during the Heatwave demonstrating the impact of high density development	Earlier responses have highlighted how a combination of high quality sustainable travel measures and changes to vehicle emissions over time should improve air quality
4.12	It is disappointing that proposed protection from increased road noise and pollution considers new residents but not existing ones.	See response above
4.12	Air quality must be consistently measured before development starts to give a baseline and then carefully monitored.	Monitoring does take place in the areas most affected, namely the Air Quality Management Areas
4.12	Care must be taken that existing local residential roads do not become car parks/rat runs and that the resulting increase in traffic from such a huge development is properly accounted for, not just ‘wishful thinking’ that the new residents won’t have cars or need to drive to work	Noted. This is a matter for detailed parking standards in the development. These are likely to vary depending on how accessible the development is to the station and the town centre, and the type and size of homes provided.
4.12	Bus services in Maidenhead have been declining for many years which will only decline further with future budget cuts	The SPD sets out measures to ensure that bus services can be properly integrated into the development. Funding will be sought from the development to secure this.
4.12.1	How is RBWM going to promote non-car travel?	This SPD sets out a range of measures to promote non-car travel, notably the provision of high quality walk/cycle links, integration of public transport into the development and the inclusion of a local centre enabling people to access local community facilities without have to use their cars.
4.13	The map of this area does not reflect that Braywick Park has been developed with a leisure centre and a school and has plans for a football stadium.	The Plan is intended to show the main planning and environmental constraints in the area rather than where existing areas of development area are or where plans may be being proposed.
4.13.1 Figure 3	Whilst SPD figure 3 illustrates the extent of flood zone 3, given the acceptability of employment space within flood zone 3a, this should be recognised through a footnote to this illustration.	This is not necessary or appropriate. The Plan is intended to show the constraints at a high level, not explain the detail of how they might be applied on a site-by-site basis.
4.13.2	The weaknesses identified for accessibility for pedestrians also applies to all the wildlife currently located on this site.	Noted – the text indicates poor connectivity generally, not just for pedestrians.

4.13.6	Please share the mitigation plans, in particular for the increased pressure on existing facilities and infrastructure, including on the highway network.	Section 6.6 of the SPD sets out transport mitigation measures, section 7 explains the approach to infrastructure more generally and Appendix 2 sets out a fuller list of infrastructure projects that need funding through section 10 agreements and Community Infrastructure Levy. Other infrastructure (eg utilities) will be provided direct by the developers in consultation with utility providers
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Section 5 Vision

Paragraph Number	Summary of Representations	Council Response
Section 5 General comment	The vision would be noble if it were not to the detriment of 132 acres of publicly owned Green Belt land with many areas of dense woodland containing thousands of mature trees. This plan decimates biodiversity that has been established for hundreds of years.	Section 6 of the SPD sets out the approach to a range of environmental matters, including biodiversity, trees, and delivery high quality design in the development
Section 5 General comment	Concerned that developers will not adhere to biodiversity policy requirements; no detail on how the +10% gain is to be achieved. If Biodiversity Net Gain cannot be achieved within the placemaking area there is no indication of how or when RBWM intends to engage with possible offset providers.	Biodiversity requirements and biodiversity net gain are policy requirements in the Local Plan and, in relation to the 10% net gain, will become legal requirements later in 2023. Section 6.7 of the SPD sets out more information on the approach to securing net gain, seeking to maximise biodiversity mitigation within the development area and then within the placemaking area. Developers are expected to work with the Council to secure the best biodiversity solutions locally.
Section 5 General comment	Plans on show at the consultation events showed very little 'green', particularly on Maidenhead Golf Course and no mention of 'blue'; it seems the SPD has already moved some way from this 'vision'.	Disagree. A strong green infrastructure framework underpins the design principles in the SPD. However, the Policy requirement in the Local Plan proforma for site AL13 for a central green space on the site in the transition area between the two neighbourhoods is not as well represented on the Framework Plan (Fig 4) as it could be.

		Amend Figure 4 Framework Plan to highlight the transition zone between the two neighbourhoods where a central green area would be located include appropriate explanatory text in the key.
Section 5 General comment	Wildlife will not be able to move from pockets of green areas across Braywick Road and the A404. There are no green underpasses planned.	Development will need to provide, as part of the green infrastructure network, good ecological/wildlife connectivity through the development areas to allow wildlife movement
5.1.2	The approach to Maidenhead from the motorway as a result of this plan will be an industrial estate and warehousing, not green fields. A large new school will front Harvest Hill Road, not hidden behind a leafy buffer. The green space at Braywick has been reduced and both Braywick Park and Ockwells Park are separated from the development site by busy roads. It is hard to see how building a high density development on green space makes for a greener existence, or increases biodiversity.	The SPD recognises the importance of the Triangle site as a key gateway to the town of Maidenhead, and this is reflected in the Pro forma for the allocated site AL14 and policy QP1b of the BLP which requires high quality new development. The SPD expresses a vision that will create continuity across the development area through the use of strategic green infrastructure to ensure that the identity of the new development reflects the perception of Maidenhead as a green town.

Section 6 Design and Delivery Principles

Sections 6.1 – 6.3 Design

General Comments on Design Section

Para No.	Summary	Council Response
6	The Windsor, Ascot and Maidenhead Community Land Trust welcome a wide range of housing types, densities and tenures. Seek solutions to problems of affordability / enable affordability to be passed on from generation to generation. Opportunities for community led development which are socially and environmentally sustainable.	Noted. See comments in relation to section 6.5
6	SPD refers to “Northern Neighbourhood” and “Harvest Hill Neighbourhood”. BLP refers to “northern” and “southern” neighbourhoods. It would be helpful if the references in the SPD were consistent with the BLP.	Noted and agree clarification is needed. Amend to make clear that the Southern Neighbourhood in the Local Plan proforma is now called the Harvest Hill Neighbourhood in this SPD
	<p>The strategic rationale for the green spine south of Harvest Hill Road (HHR) is reduced if there is no longer a requirement for the bridge over the A308M.</p> <p>It should be replaced with a network of green streets south of the HHR.</p> <p>The Green Spine is too wide south of the HHR. This will lead to design problems and isolated blocks of development. It would also</p>	The ‘Approach to the Green Spine’ section already focusses on legibility and directness of access to the Local Centre as the purpose of the green spine (north and south of HHR) as well as overall good connectivity via sustainable means. The removal of the bridge over the A308 does not affect this, the primary reason for an intact and legible green spine extending to the south of HHR.

	<p>affect parking layout. If it is to be retained then it should split at the local centre and extend further to the east.</p>	<p>The proposal to split the green spine and locate it further east would dilute its coherence and legibility, as would replacing it south of the HHR with a network of green streets.</p>
	<p>The role and function of the Southern Green Fringe needs to be clearer</p>	<p>Noted.</p> <p>Amend text at: Annotation 6 on the Framework Plan for the southern green margin, paragraph 6.3.25, and annotation to 3rd row to Green Spine diagrams at 6.3.26, to reflect the intended combined biodiversity and informal recreation function of the southern green fringe.</p>
<p>Building Heights generally</p>	<p>Development of 5 or 6 storey blocks (or 6-8 storeys) are too high – this is high ground and development of this scale will dominate the surroundings and be clearly visible from Cliveden.</p> <p>The site is not in the town centre or even the town centre fringe.</p> <p>Building heights would not be sympathetic to the surrounding area which is mainly 3 storeys and would affect quality of life of nearby residents including due to overlooking. Site is already higher than properties on eastern side.</p> <p>Taller buildings separate people from the street, are not good for people’s health and are not suitable.</p>	<p>The Local Plan proforma for the AL13 site distinguishes between the two neighbourhoods, highlighting that the northern neighbourhood will be orientated towards the town centre with building heights and densities reflecting those in the town centre.</p> <p>The northern neighbourhood is close to the town centre.</p> <p>Concerns are recognised about the relationship with the surrounding residential areas, and there should be a principle that building heights step down from the centre to the edge of the site as a result.</p> <p>Amend the guidance to highlight the issue of the relationship with surrounding properties and illustrate with a diagram the principle of stepping down heights towards the edge of the site</p>

	The SPD fails to highlight any guidance on building aesthetics and misses an opportunity to set the bar for architectural flair and individuality which is lacking in the town centre developments viz the new car park (eyesore) on Stafferton Way.	The SPD is intended to focus on design principles. Detailed architectural considerations will be considered fully at the planning application stage.
	The SPD states that the dense flats may be 6-8 storeys high and this is supported by flats in Broadlands which are this height. This is incorrect. These flats are only 3-4 storeys high and are all below the development on golf course and indeed cannot be seen. The heights of dwellings at town end of development should be of similar height to Rushington Avenue. Should be more guidance on building heights.	Noted. Further guidance on the approach to building heights at this northern end of the AL13 site is set out in the Building Height and Tall Building SPD, a draft of which was consulted on recently.

Comments on Illustrative Framework Plan (Figure 4)

Para No.	Summary	Council Response
General	When finalising the document, it is considered that a clearer key with larger symbols would be beneficial.	Noted – will increase symbol sizes in Figure 4 to make them clearer

4d	<p>There are significant changes in existing levels, as well as unregistered land and existing residential properties, which would prevent a frontage onto Kimbers Lane from being feasible. Feedback from public engagement has also identified significant concern about any proposals, which include development fronting this location. Accordingly, notation 4d should be reworded to remove reference to built form fronting both sides of Kimbers Lane.</p>	<p>The note sets out an important planning and design principle with regard to built frontages onto Kimbers Lane. The developer should look to identify solutions that respect the principles set out in the SPD where there are constraints</p>
5	<p>Reference is made to the 'Harvest Hill neighbourhood' however, this has not been defined in the draft SPD and accordingly it is unclear which elements of the allocation this note relates to.</p>	<p>The Harvest Hill Neighbourhood is defined variously at annotation 2, 4b and 5 of Figure 4, within the 'Approach to Harvest Hill Neighbourhood' section, the 'Approach to Green Spine' section, as well as housing and community needs sections.</p>
6	<p>This notation identifies that the southern green margin will contribute to biodiversity gain across the South West Maidenhead area. At present, no agreements are in place between the stakeholders and this land is in private ownership. It is unclear what role this area is expected to make, nor how this will be delivered or secured, or how it will relate to the wider South West Maidenhead area. It should not be expected or assumed that these areas should (or indeed can) offset other developments within the wider allocation. Site specific strategies should be provided with each application and if unfeasible to deliver on site, and where there are multiple applications, a strategic approach should be taken to securing off-site credits</p>	<p>The role of the southern green margin is identified as contributing to biodiversity gain across the South West Maidenhead area, as well as informal recreation. As an ecological facility it should connect to the wider network of wildlife corridors and habitats.</p> <p>It is for developers to ensure there is coordination across different application sites</p>

10	Reference is made to “ <i>a series of key junctions</i> ”, however, only one label has been included on the diagram and, as such, it is unclear which other junctions are also considered to be key. We would suggest that the other key junctions are also identified, which could also be ordered in relation to their scale and therefore, significance.	Agree clarification would be helpful. Amendment - Label '10' duplicated to refer to every symbol of the same type denoting 'key junction'.
Green Spine	Suggest the addition of an annotation to the Plan that, in the area south of Harvest Hill Road, this function of the green spine could be accommodated via green streets, enhancement/management of existing boundary vegetation and through the incorporation of good planning and design practice.	No change to the function of the Green Spine Amendment - Clarification added to the Green Spine table (at 6.3.26: row 5, 2nd sentence) identifying that it will be distinguishable from the surrounding green streets which feed in to it, creating a hierarchy between the spine and surrounding streets.
Table at p.26 Item 4	This description of the green spine does not reflect its different requirements along its length and as such contradicts the SPD elsewhere where it acknowledges the ‘form and function’ of the green spine will vary.	The function of the green spine remains unchanged, however: Amendment: the text has been amended to reflect a more flexible use language whilst ensuring it continues to serve its purpose.
Illustrative Framework	Where green streets are shown in the Illustrative Framework Plan on the land south of Harvest Hill Road, on our client’s land in an east-west direction, the potential for such links and their location(s) are limited by land ownership constraints and physical features – principally, the existing hedgerow which borders our clients land to the west. Whilst only an illustrative plan, we consider it important that what is shown is ultimately deliverable.	It is important that landowners/developers in preparing their planning applications work together to deliver green streets and good east/west connectivity.

<p>Triangle site Annotation 3</p>	<p>It is essential that the text at annotation 3 of the Illustrative Framework Plan notes the internal arrangement and layout of the site will have regard to market needs at the time of formal application submission/determination.</p> <p>It should also recognise the requirements associated with larger units which are acceptable on the site and that this could readily result in divergence from the illustrative layout.</p>	<p>The layout included in this section is clearly indicated as illustrative. It would not be appropriate or necessary to change the text to refer to market needs at application stage, as the Local Plan policy provides the framework for what should be provided on site.</p> <p>Annotation 3 has been amended to reference the acceptability of larger units, only where they are required to secure a delivery of a mix of units as part of a comprehensive scheme, in line with Local Plan policy.</p>
<p>Triangle Site Annotation 3</p>	<p>Point 3 references consideration of street scene and public realm matters, the needs of operators/users of the buildings are important, especially with respect of servicing arrangements which could hinder the aspirations in the SPD. Additionally, given the limited opportunities within the borough to meet the needs for employment floorspace, this will impact upon the ability to achieve extensive separation of vehicular and pedestrian movements on the site.</p>	<p>The creation of good public realm in this development is critical.</p> <p>The text at the 4th sentence of annotation 3 of the Illustrative Framework Plan has been amended to reference servicing arrangements, however, this is not incompatible with achieving a high quality and safe public realm.</p>
<p>Triangle Site Annotation 3</p>	<p>The last sentence of annotation 3 is considered to be overly detailed for the SPD in referencing 'active elevations', given the evolving needs and demands of the Borough's business market.</p>	<p>The SPD is seeking to establish important design principles and this reference is not considered to be inappropriate or too detailed</p>
<p>Braywick Park</p>	<p>Appropriate to show existing facilities located within the park</p>	<p>Whilst this is not considered necessary, the changes to Figure 4 more clearly distinguish the built form and green space at Braywick Park, and the leisure and recreation facilities are regularly referenced throughout the SPD.</p>

<p>Braywick Park Annotation 8</p>	<p>Suggest that a distinction is made between Braywick Park and Ockwells Park given the important indoor and outdoor sports provision at Braywick Park, rather than the informal outdoor recreation space at Ockwells Park.</p> <p>Suggested change to text: “In addition to being a strategic green space, Braywick Park accommodates a range of indoor and outdoor sports and leisure facilities, a SEN school, a restaurant and a garden nursery. and Improvements.....”</p>	<p>It is not considered necessary to distinguish between the characters of the two parks at Braywick and Ockwells given that, combined, they provide important strategic green spaces and leisure facilities for the whole of Maidenhead. The policy context section of the SPD already sets out the appropriate uses in the AL15 designated area.</p>
<p>Figure 4 and Annotation 13</p>	<p>Annotation 13 of Figure 4 shows a proposal for a station forecourt on land the Council / developer do not have control of so it would be impossible to implement. It shows a key junction with links to the station and a high density hub which if implemented would result in the loss of a strip of ancient woodland.</p>	<p>The pink shaded area labelled ‘Station Forecourt’ has been removed from Figure 4 as it has been misinterpreted as a redevelopment area.</p> <p>The text for annotation 13 remains unchanged as it reflects the vision to create a direct access to the station.</p>
	<p>A footpath / cycleway link to the station is proposed but there are ownership constraints, and the land is so steep it would not be possible to implement to a standard that is safe and would meet Highway standards. It would also require the removal of mature trees.</p>	<p>Pink shading removed (as comment above)</p> <p>Annotation 13 suggests development form should safeguard the long-term potential to realise the possibility of connecting the SWMPA with the Station and Town Centre beyond. As a consequence, the green spine is shown extending to the northern-most boundary of the development area where it would meet the existing footpath and a key junction indicated.</p>
	<p>The landscape buffer for Courtlands and Crescent Dale would be removed and replaced with 8 storey high, high density buildings set on significantly higher ground.</p>	<p>The AL13 proforma in the BLP and the SPD indicate that building height, densities and typologies in the northern neighbourhood will reflect those in the town centre given its proximity. Despite the indication that densities are likely to be higher in the northern</p>

		neighbourhood the SPD encourages a variety a of building heights to be considered and is not prescriptive in this regard.
	A safe pavement/cycleway needs to be built that goes up the length of Harvest Hill Road	The Harvest Hill Road section of 6.3 and Appendix 2 (Infrastructure Schedule) identifies the need for a walk/cycle route on the north side of Harvest Hill Road

Comments on Access and Movement Diagram (Figure 9)

Para No.	Summary	Council Response
Figure 9 and annotation i	The delivery of additional frontage onto Kimbers Lane is not considered feasible. Further it is considered that the incorporation of further development along this frontage would also detrimentally impact the existing character of the country lane.	This is an important planning and design principle with regard to built frontages onto Kimbers Lane. The developer should look to identify solutions that respect the principles set out in the SPD where there are constraints
	It is unclear how the southern green margin can successfully perform a role as a legible and accessible pedestrian and cycle route through the development, whilst also still delivering biodiversity enhancements as referenced in the Illustrative Framework Plan.	<p>Pedestrian and cycle connectivity and biodiversity are not considered to be mutually exclusive.</p> <p>The descriptions of the southern green margin within the SPD are sufficiently flexible to enable a variety of design solutions to combined ecological and informal recreation uses.</p>

	<p>Concerned regrading the compatibility of the aspirations for Kimbers Lane and the nearby surroundings given the existing waste transfer facility, which does not appear to be adequately addressed in the draft SPD as an existing constraint. This issue would be further exacerbated by the pending appeal decision (ref:APP/T0355/W/21/3289347) associated with the waste transfer facility, which would increase the number of HGV movements along Kimbers Lane substantially.</p>	<p>Paragraph 4.12.4 identifies there is an existing inert waste recycling site to the western end of Kimbers Lane.</p> <p>It is unclear how this existing use would restrict improvements to make links to Ockwells Park safer and more legible.</p> <p>The outcome of the appeal is unknown at the time of preparing this response.</p>
Item 9	<p>The existing planting to be retained and new planting should be a meaningful width (3-5m) with a pedestrian path in the middle, but unlikely to work for some Protected Species. Widths should be 50m</p>	<p>This is not considered to be appropriate or necessary</p> <p>A suitable planting width would be determined at planning application stage and could be specific to any individual situation, such as existing planting, length/ nature of existing property, rear boundary type, which will vary.</p>

Comments on Other Diagrams in section 6.3

Para No.	Summary	Council Response
Figures 4 and 9	Question the proposed location of the green spine as shown on Figures 4 and 9 because it would direct pedestrians and cyclists to the outer extremity of the southern green margin to an area of scrub vegetation. It therefore does not represent the likely desire line for journeys from the local centre southwards.	<p>The green spine provides a continually connected and legible route for pedestrians and cyclists throughout the South West Maidenhead areas, from the station and the northern neighbourhood, through the local centre and southern (Harvest Hill) neighbourhood, connecting to the southern green margin at the furthest southern point, which could be used for informal recreation as well as biodiversity gain. It is a key route into which other pedestrian and cycle routes can make their way to, gathering up pedestrian and cycle movements.</p> <p>Amend text at Annotation 6 of Figure 4 to reflect the potential dual function of the southern green margin to include informal recreation, which makes the continuation of the green spine to this point in keeping with the legibility.</p>
Figures 5 and 6	Suggest show Braywick Road on these diagrams	<p>Agreed</p> <p>Diagrams amended to show Braywick Road including the appropriate annotation</p>
Figure 7	Suggest the title is amended to: “Illustrative cross sections – Accommodating family housing”	<p>Agreed</p> <p>Amend title to include ‘Illustrative cross sections’ and additional text included before the illustrative sections to clarify they are not intended as a specification of building heights.</p>

P47 – 48	<p>Section C indicative cross section for the green spine demonstrates an inefficient use if the space and discords with the text box at p45 where it refers to an ‘oversized residential street’.</p> <p>Suggested redesign of the layout of the green spine.</p> <p>Also observed if parking in area ‘F’ is not allowed for more than occasionally it will have the effect of pushing parking into rear parking courts which can be undesirable from a design perspective.</p>	<p>The cross sections are for illustrative purposes and do not show a definitive design for the layout of the green spine, rather they set down some general principles</p> <p>The SPD establishes that the approach to parking will vary in the different character areas</p>
Figure 11 (b)	<p>Surely a better junction for vehicular access will also be required between Shoppenhangers Road and Harvets Hill Road?</p>	<p>The text referenced here is explaining how best to improve provision for cyclists and pedestrians at either end of Harvest Hill Road; it is not concerned with vehicular access.</p>
Figure 11 (d)	<p>The individual TPO trees along the south side of Harvest Hill Road in section d may prevent a segregated cycleway being provided on this side of the carriageway.</p> <p>Suggested the best location for an east-west cycleway would be along the north side of Harvest Hill Road. Do not need one on both sides of the carriageway.</p>	<p>Retention of TPO trees need not prevent a segregated walk/cycle route, however, the route may need to deviate to accommodate the trees</p> <p>It is possible that a cycle way may not be needed on both sides of the road, however, a footway will be required on the south side as well as the north.</p> <p>Amend text at Figure 11 d: to reflect the above</p>
Figure 12 (p56)	<p>Object to the requirement that the green spine to the south of Harvest Hill Road (HHR) should be greater in width than HHR. Do not agree it is necessary or justified in the location south of the HHR, and certainly not beyond any ‘way finding’ function (i.e. beyond the entrance of our development parcel).</p>	<p>As stated above, the purpose of the green spine is more than just way finding.</p>

Detailed points in relation to the text (sections 6.1 – 6.3)

Paragraph Number	Summary	Council Response
6.1.2	<p>The overarching design principle below is just ludicrous when this plan is set to destroy 200 acres of green belt land including the 132 acres of the golf course land.</p> <p>“Ensure that development is designed to incorporate measures to adapt to and mitigate climate change, including the delivery of net zero carbon development on site where this is feasible.”</p>	<p>The Local Plan proforma for AL13 includes a series of measures to mitigate the impact of the development, many of which are reaffirmed within the SPD.</p>
6.1.2	<p>The principles focus on AL13 and AL14 but should also cover AL15 and suggest adding:</p> <p>“Create a high-quality strategic sporting hub for Maidenhead, comprising a range of high quality indoor and outdoor sporting facilities which meet identified needs.</p> <p>And Braywick Park is visible from A308 and QP1b requires a strong and identifiable gateway into Maidenhead from the South, so add:</p> <p>Create a distinctive, sustainable, high quality new development which provides a strong and identifiable gateway into Maidenhead from the south.”</p>	<p>The text suggested is not considered to be compatible with the Local Plan proforma for AL15, where it is identified as a ‘Strategic Green Infrastructure site’, with a variety of uses, not just a sports hub.</p> <p>The suggested text on providing a gateway into Maidenhead is the same wording used in clause 5b of Policy QP1b in the BLP and there is no need to repeat this in the SPD.</p>

6.1.2	<p>Bullets 2, 3 and 4 seem to have been ignored in the northern neighbourhood. How can high-density flatted developments 'include varied residential character and mix of housing types'. Where are the 'centre of activity' and 'vibrant local centre' which will 'facilitate more sustainable lifestyles'? Are they both the 'town centre'?</p>	<p>The 'varied residential character and mix of housing types' relates to the whole of the SWMPA rather than a particular area within it.</p> <p>The northern neighbourhood is identified as comprising a low traffic, high density development due to its proximity to the town and station. The southern (Harvest Hill) neighbourhood includes residential areas to the north and south of Harvest Hill Road and is focussed around the school and local centre and is therefore intended to primarily comprise family housing.</p> <p>The SPD has been amended to include an area of transition between these two neighbourhood areas to the north and south. This area would mark a distinctive transition through green space from one neighbourhood area to the other. This recreation and ecological space would serve the northern neighbourhood as well as the southern and the legible green spine would encourage a sustainable connection from the northern neighbourhood to the local centre.</p>
6.1.2	<p>There is a risk that the 'higher hierarchy' version of the green spine would have the effect of dividing and isolating some residential development blocks, contrary to paragraph 6.1.2 which seeks to avoid piecemeal or isolated part of development.</p>	<p>The continuous nature of the green spine on the north / south axis is the legibility and coherence that would ensure developments do not appear isolated or piecemeal.</p>
6.1.2	<p>Suggest paragraph 6.1.2 wording is altered from "... including the delivery of net zero carbon development on site where this is feasible" to "...unless it can be demonstrated that this is not feasible, in which case the requisite contribution to the Carbon Offset Fund should be secured as a planning obligation." It should be a requirement, not a preference, that net carbon is achieved on the site</p>	<p>Amend text to remove reference to delivery of net zero carbon development.</p> <p>This is because the subject is considered at length in Section 6.7.</p>

6.2	<p>The level of information contained in the draft SPD does not enable Thames Water to make an assessment of the impact the proposed development will have on the waste water/sewerage network infrastructure and sewage treatment works. To provide more specific comments details of the type and scale of development together with the anticipated phasing would be required.</p>	<p>It is not appropriate for the SPD to contain this level of detail; this is a matter for the developers to liaise with Thames Water at the planning application stage.</p> <p>However, it is considered appropriate to provide some high level guidance and signposting to policy on water infrastructure.</p> <p>Add short section on water infrastructure in section 6.7</p>
6.2 Figure 4	<p>It would be impossible to build a 4m wide footpath / cycleway linking the train station as the developer would not have control of the land. The steep topography would make the footpath / cycleway unsafe. Widening the path would result in the removal of a strip of ancient woodland.</p>	<p>The green spine is indicated to extend up to the northern boundary of the site, where an existing footpath connects to Shoppenhangers Road and the station forecourt beyond.</p> <p>Whilst it may not be achievable in the short term, the text for annotation 13 remains unchanged as it reflects the long-term vision to create a direct access to the station from the SWMPA.</p>
6.2 Figure 4	<p>The gardens at Rushington Avenue should not have to retain their planting along the rear gardens to contribute to connectivity for wildlife benefit. If private gardens are removed from the hatched area, what remains is a narrow strip of 10m. A 10m buffer zone is inadequate to provide any landscape screening or mitigation against the impacts of the proposal on neighbouring properties and would not be sufficient to protect existing mature trees.</p> <p>The green hatched area should remove land outside of the Council's control and the green hatched area should be extended within the development area by up to 30m.</p>	<p>The SPD does not require neighbouring properties to retain existing planting within their rear gardens. Annotation 9 refers to retaining planting along the rear of neighbouring properties.</p>

Figure 4 & Figure 9	If the continuation of the green spine is needed south of Harvest Hill Road, a more appropriate location would be for the green spine to split in the local centre and then extend further east before crossing Harvest Hill Road	Disagree. This would dilute the continuity and legibility of the green spine.
6.2.2	A masterplan for the whole SW Maidenhead development will be required before anyone planning application can be considered for a particular phase. It is not possible to comment on individual planning applications without seeing how each piece of the jigsaw fits into the entire development. The principal developer for SW Maidenhead must prepare a phased masterplan illustrating the sequence, layout and areas of build. This must be produced prior to the submission of any detailed planning application.	The SPD is intended to provide a framework for planning applications to come forward in a way that delivers comprehensive and coordinated development, by both providing design principles and a coordinated approach to infrastructure delivery. The Council is unable to prevent planning applications being submitted prior to the adoption of the SPD.
6.2.2	Table makes a number of statements using the word “should” – needs to be more affirmative by using “must” or “will” or “need to”	Use of the words suggested risks using the statements being interpreted as policy rather than guidance which would not be appropriate in an SPD.
6.2.2 Illustrative Framework Plan Item 12 on Map	As an owner of a property on the south side of Harvest Hill Road (HHR) it is critical for us that the junction of HHR and Braywick Road is improved / reconfigured before construction on the south side of HHR begins. It is already very dangerous to cross as a pedestrian from HHR over Braywick Road to Bray/Braywick Nature Park and School. Before the crossing is made busier with construction traffic and large lorries a safe crossing needs to be constructed.	Section 6.6 of the SPD and Appendix 2 (Infrastructure Schedule) identify this junction as being in need of improvement. It is agreed that this should include crossing facilities across Braywick Road for pedestrians and cyclists, connecting up with the proposed new pedestrian/cycle route on Harvest Hill Road.

<p>6.2.2 Illustrative Framework Plan Item 12 on Map</p>	<p>A safe pavement / walkway needs to be built and made available that goes up the length of HHR at the beginning or an early stage of the development. Currently there is no safe pavement or cycle route up the full length of HHR from Braywick Road to Shoppenhangers Road. Once construction traffic starts using HHR it will be very dangerous to walk or cycle up HHR in its current condition.</p>	<p>Agreed. The SPD proposes that a segregated walk/cycle route should be provided on the north side of Harvest Hill Road. Section 7.2 of the SPD highlights that this is one of the pieces of infrastructure that should be delivered early on in the development.</p>
<p>6.2.2</p>	<p>Pocket parks are not going to be sufficient for wildlife and health. Significant areas of greenspace and woodland are required to have healthy habitats for wildlife, clean air, shade and a place for recreation and improved mental health and wellbeing.</p> <p>The plans currently show high density development abutting the Ancient Woodland of Rushington Copse.</p>	<p>Pocket parks are not the only open space proposed. A central green area, a green infrastructure network including green spine, and a southern green fringe will all contribute towards open space, recreation and habitats for wildlife.</p> <p>The Local Plan proforma indicates that buffers will need to be provided to protect Rushington Copse.</p>
<p>6.2.2</p>	<p>The Illustrative Framework Plan is misleading as it shows Braywick Park as being entirely green but there are large buildings and a car park there. There are also plans to build a new football stadium there.</p>	<p>Figure 4 has been updated with the Leisure Centre and other main buildings having been excluded from the green shading at Braywick Park. They are now identifiable as built areas.</p> <p>However, the football club does not have planning permission for a new stadium and it is not allocated in the BLP, as such it would not be appropriate to reflect this on Figure 4.</p>
<p>Table at page 27</p>	<p>A clear distinction should be made between Braywick Park and Ockwells Park. Suggest point 8 in the table should include reference to the existing sports facilities at Braywick Park.</p>	<p>This is not considered necessary – the policy context already sets out the role of the AL15 allocation.</p>

6.3	Within the Design Principles (section 6.3), the proposed methodology for urban block structure should make reference to maximising opportunities for both natural heat (solar gains) and ventilation through the optimal orientation of buildings (see BLP Policy SP2(1)(a)).	Agree that reference should be made to natural heating and ventilation, but it is important that this does not compromise the integrity of a walkable and legible neighbourhood. Amend parts 1 and 5 of the section on block structure (6.3.6) to refer to maximising opportunity for natural heat and ventilation.
6.3	Disappointing that the proposal for an active-travel connection to the triangle site via a bridge over the A308(M) appears to have been discounted due to cost. We would like to see the green spine also extend south to the triangle site through the creation of a green bridge.	Section 6.6 of the SPD indicates that the option of the bridge and an alternative solution were reviewed and it was concluded that the alternative could provide comparable benefits.
6.3.1 Figure 5	In the area marked AL14 - allocated as an Industrial Site - A new, large supermarket should be mandated to be built to serve the community in this area that is increasing in size.	The AL14 site is allocated in the Local Plan for industrial and warehousing purposes to help meet the need for that type of development. The SPD cannot change the allocation in the Local Plan. The policy for the AL13 housing site includes the requirement for a local centre to include local retail facilities. This will be more convenient and accessible for those living in the new housing development.
6.3.2	This is a major change from the BLP. In that plan the northern end of the golf course is not in the town centre and is not even in the town centre fringe. This is a very significant change serving presumably to somehow justify high density multi storey development in this location	The Local Plan proforma always recognised that the northern part of the AL13 site would be orientated towards the town centre making the most of proximity to the railway station and the town centre facilities. It indicates that the building heights, densities and typologies will reflect those in the town centre. The guidance in the SPD concerning the northern neighbourhood reflects the local plan policy.

6.3.2 -6.3.4	<p>There should be guidance on dwelling types</p> <p>Should also include proportion of private rented properties and breakdown of tenure types</p>	<p>The policies relating to mix of housing and housing tenure are outlined in HO2 and HO3 of the Local Plan. This includes requirements for different tenure types for affordable housing. Section 6.5 of this SPD sets out further detail and evidence as to how this should be applied in relation to the SPD area. The design guidance discusses housing typologies at various points, particularly in relation to delivering family housing. It is not appropriate to set a proportion of private rented as the Local Plan policy and related evidence base does not provide a basis for this.</p>
6.3.3	<p>How different are the lifestyles and why? If the objective is to develop two balanced and inclusive communities with varied residential character and a mix of housing types, this plan is doing the opposite. It means that people living nearer the town centre will have a more constrained lifestyle. There is nothing very inclusive about that.</p>	<p>The Local Plan says that two distinct neighbourhoods each forming a clear sense of place, should be created. It is clear from the Local Plan that they will have different characters.</p>
6.3.5	<p>Unless money can be found for a bridge across the A308(M) it seems unlikely that the number of walkers and cyclists prepared to navigate the A308 Holyport roundabout to access the Triangle site will do much to alleviate the amount of road traffic to AL14.</p>	<p>Having reviewed the option of the bridge and the alternative, it is considered the alternative approach involving improved pedestrian and cycle access around the Braywick roundabout and to the AL13 site and to the town centre could provide comparable benefits to the bridge and is the preferred approach.</p>
6.3.8 Northern Neighbourhood	<p>What vehicular access is to be permitted? What is the public and private parking provision? These should not be down to the developer to determine. This must be determined by the planning team.</p>	<p>At the northern end vehicular access would be on to Shoppenhangers Road via the existing access to the golf course club house. Further access points would go on to Harvest Hill Road. Parking provision will be determined at the planning application stage having regard to the detail proposals at the time. The final decision on this rests with the Council who determine the planning application.</p>

6.3.8	It's contradictory to say you'll have a green spine for active/sustainable travel and wildlife but you will also accommodate cars. You say this is a sustainable development next to the station, so keep the cars out.	The SPD is clear at various points that priority should be given sustainable modes of travel in the green spine – notably pedestrians and cyclists (e.g see Box in para 6.3.26) as well as public transport. It is not appropriate to exclude cars from the development as a whole.
6.3.8	“the central green spine as the main focus of movement, activity and recreation” The central green spine, created by felling dense, mature woodland is a complete misnomer – this is just a spine!	The Local Plan and SPD make clear this needs to be a green spine and detailed guidance is included to set out the character and form of the green spine.
6.3.8 Approach to Harvest Hill Neighbourhood diagram	The shading on this diagram is unclear, and the text requiring the ‘built form’ to draw attention to the green spine is ambiguous. Does this mean higher densities, taller buildings, closer to the street frontage? This requires clarification.	The darker shading illustrates potentially higher density/taller buildings. An additional diagram is added to illustrate how buildings should step down in height towards the edge of the development which clarifies this point. Add diagram to illustrate the stepping down of building heights to the site boundary
6.3.9	<i>“Building at density must be coupled with adequate provision and accessibility to high quality public realm and a mix of open space from private to public, active and passive. The environment must be one which makes higher density living attractive”</i> . Should this not be moderate density living?	Higher density living is the right phrase to describe what is envisaged, consistent with the proforma in the Local Plan for the AL13 site. Moderate density would potentially be misleading.

6.3.9	No evidence to suggest high density development creates community. High density should be defined by persons or dwellings per hectare	This paragraph does not claim any connection between high density and community. It simply outlines that where high density is necessary there should be a series of facilities and a quality of environment which support community. (In essence agreeing with this point acknowledging that, without this high quality public realm and suitable facilities high density development will lack any ability to accommodate functional community).
6.3.10	Definition of sustainability in this plan is inaccurate and outdated. It doesn't relate to the affordability of the project but to the protection of the environment for future generations	The allocation of the site in Local Plan has been tested through a sustainability process, assessing the site against social, economic and environmental objectives and the independent planning inspector considered that the Plan, including the SW Maidenhead sites were sound, having regard to sustainability evidence. The affordability of the project was not a factor in that sustainability assessment.
6.3.9-6.3.10	Why do these and subsequent paragraphs not also apply to the northern neighbourhood? Are you creating two different classes of neighbourhood? A high density inner city flatted development in the north and a more pleasant residential neighbourhood in the south?	See response above. The two distinct neighbourhoods reflect the characters described in the Local Plan proforma. Do not agree with the description of the neighbourhoods in the comment.
6.3.12	In this case there needs to be a design statement about how big these amenity spaces should be, how near to dwellings and how they will be maintained. Otherwise community spirit and cohesion will be jeopardised by play problems which, commonly, are top of the list of resident gripes exacerbated by a blurring of defensible space.	The SPD is setting some design principles to guide future planning applications. It is not intended to provide detailed standards.

6.3.13	This is redundant. No need to plant any new trees. Change the policy and leave the nature trees on the site	Provision of street trees as part of new streets is an important principle to achieve a high quality development
6.3.13	A welcome paragraph though it would help to suggest that selected tree species should be a) drought tolerant mindful of predicted climate in 20 years, b) resistant to all known diseases, c) good at providing shade.	<p>Agree it would be helpful to refer to the environment in which they are located.</p> <p>Amend to add reference to them being suitable for the environment in which they are located</p>
6.3.16	Paragraph 6.3.16 of the SWMF SPD states that an element of off-site provision to meet the open space requirements of the development of site AL13 could potentially be met via the existing provision at Braywick Park. In our view, the SPD should more strongly discourage this approach. However, if an element of off-site provision is to serve that development, it will be necessary for a financial contribution to be secured towards enhancing the quality of provision at Braywick to cater for the increased demand and usage which would arise.	<p>Agree that reference to financial contributions towards playing pitches should be included in the SPD.</p> <p>Add to section on open space (section 6.5) to indicate the likely need for financial contributions to off-site playing pitch provision.</p>

6.3.16	<p>Concern that the carrying capacity of the playing fields at Braywick Park may be reaching the maximum already, without have additional demand form a new school. RBWM has recently commissioned a new playing pitch strategy which will be completed by spring 2023. The findings of PPS should inform whether or not there is enough capacity for a school's use on this site. It maybe that the school may need to pay for the installation of a hybrid pitch at Braywick Park.</p> <p>Reworded to Ideally, all the school sports facilities would be located on the main school site. Should this not be possible, an element of off site provision could be provided in Braywick Park to cater for peak usage (e. for major sporting events) <i>subject to the results of the playing pitch strategy 2023</i>. Access to the off site sports provision would need to be improved to allow safe access for the school.</p>	<p>Amendment proposed is not necessary here but as per response above, there is a need to highlight the likelihood of financial contributions to playing pitches being required in section 6.5 which should also highlight the work on the Playing Pitch Strategy.</p> <p>Include reference to playing pitch strategy in new section on playing pitch provision in section 6.5</p>
6.3.18 – 6.3.19	Must highlight that these are purely illustrative	Not necessary. The start of section 6 indicates that the diagrams in this section are illustrative. The principles in the text are not illustrative.
6.18 – 6.19	Reference to a third neighbourhood (the Triangle site) is confusing in the light of Local Plan policy – suggest referring to only the two neighbourhood on AL13 site	<p>Agree</p> <p>Delete reference to the Triangle site as a neighbourhood – refer to it as an employment area</p>

6.3.19	Planting a few new trees to create “tree lined” main routes will do nothing to mitigate the loss of mature trees from this site.	The SPD highlights the importance of protecting as many mature trees as possible and integrating new tree planting in the design of the developments.
6.3.19	Does not recognise that larger units are acceptable on the site and consequently is inconsistent with policy ED1. To address this, the word ‘could’ in the third sentence needs to be replaced by ‘should’.	Amend the text to more accurately reflect the wording in the Local Plan Policy ED1.
6.3.21 – 6.3.23	Substitute “can” with “need to”	Agree this can be made firmer. Amend “can contribute” to “will contribute” in the second line of para 6.3.21
6.3.22	This plan aims to decimate the high quality green space and replace it with a space that by the very nature of it being “multifunctional” cannot be high quality	Whilst recognizing that the character of the area will change, the aim is to provide a high quality publicly available green space in the new development
6.2.23	The Green Spine connecting the local centre to the town centre to the north is considered a strategic link. However, do not consider the Green Spine should continue at the same scale to the south of Harvest Hill Road where its purpose is no longer strategic in nature. The scale of the Green Spine south of Harvest Hill Road is not proportionate or necessary to achieve its objectives. Do not need the formal designation of a ‘green spine’ to achieve ‘green’ streets and ecological and landscaped corridors.	It is the ambition that the green spine will become the preferred route for pedestrian and cycle access to the local centre and encourage more sustainable methods of travel. It is therefore considered the green spine to the south of Harvest Hill Road remains part of the ‘strategic link’ and consequently, its continuation at the same scale is both proportionate and more coherent than navigating a ‘local network of green routes’. The alternative ‘local network of green routes’ proposed is unlikely to have the same desired effect on encouraging reduction of vehicular use and would dilute the legibility of the SWMPA.

6.3.23	There's no doubt that every one of us has to consider more sustainable forms of transport. But the idea that public transport, cycling and walking along this route will reduce traffic both within the site and on Braywick and Shoppenhangrs Roads has to be seen as aspirational rather than realistic. Two schools and a substantial medical centre are unlikely to be catered for in this way. The site is elevated and the distances are too great	Noted – but the aim should be to reduce traffic in and around the site by providing good sustainable alternatives to the car. Provision of facilities on the site mean that those living on the site will have shorter distances to travel to those facilities making the use of non-car modes easier.
6.3.25	Support the reference to provision of a “southern green margin” alongside the A404(M) and A308(M) (at paragraph 6.3.25) and that this can be used to maintain ecological continuity. However, we note later comments in respect of this land and the delivery of Biodiversity Net Gain (BNG) (e.g. paragraph 6.7.11) on which we have commented below.	Noted
6.3.26	How exactly will this green spine ensure “ecological capital”. Please define this further! There is nothing in this document that truly addresses ecology except in the context of making a place ‘look’ green. Certainly, any wildlife that is currently located on the site will have disappeared by the time the development is complete!	Developers will need to design the scheme to deliver this objective.

6.3.26	<p>There is considerable detail on creating a local centre for the Harvest Hill neighbourhood, yet no consideration of the facilities required by the Northern Neighbourhood on the grounds it is near the station and town centre.</p> <p>The schematic at the top of p45 makes the station look closer than it is, and even though regeneration of Maidenhead may eventually unite the station and the town centre, many properties in the Northern Neighbourhood will still be half a mile away and up a hill. This new neighbourhood needs a focal point of its own, with basic facilities to generate a sense of community and also deter people from using cars for small purchases, eg last minute groceries.</p>	<p>The local centre is a specific policy requirement of the Local Plan for the Harvest Hill neighbourhood, but it is not for the northern one because of its accessibility to the town centre. That does not mean to say that an element of mixed use development along the green spine at a design focal point would not be acceptable. Improved walk/cycle connections to the town centre will, however, make the town centre as the key destination for basic facilities.</p>
6.3.26 – 6.3.29	<p>The principle of the Green Spine performing a structural, functional and ecological role is laudable but without an access point at its northern tip it fails in its main aim of providing a direct link to the town centre. To be successful it will also require a seismic shift in public attitudes and bus services which seems unlikely.</p>	<p>Noted, but it is important to create the right facilities and design to enable that shift to take place. The diagrams show several potential access points for pedestrian/cycle access to the town centre.</p>
6.3.27	<p>Sustainable drainage is shown in cross sections but otherwise not covered. If sustainable drainage is not properly designed, constructed and maintained, downstream pollution and flooding may result. Some RBWM document for SW Maidenhead needs to define who is responsible for the design (in phases), interim maintenance prior to adoption, final adoption and ongoing maintenance of such schemes.</p>	<p>Policy NR1 in the BLP requires the provision of sustainable drainage systems in new development and the proforma for AL13 also requires the use of Sustainable Drainage Scheme (SuDS). The detail of how this is delivered will be determined at the planning application stage.</p>

<p>6.3.27 and Figure 9</p> <p>6.3.30,</p> <p>6.3.31 and Figure 10</p>	<p>Suggested that the junction between Harvest Hill Road and Braywick Road is a traffic light junction where cars can turn right as well as left. It should encompass also a pedestrian crossing as many residents currently cross the carriageway to access Braywick Court School, Braywick Nature Centre and Braywick Sports Centre.</p>	<p>Noted. The detailed nature of any junction improvement at this location has not been determined yet and will need to be considered as part of the transport assessment for planning applications. Agree that a pedestrian crossing is needed at this location for the reasons stated and part of that improvement and this is assumed in broad infrastructure costings in Appendix 2 of the SPD.</p>
<p>6.3.27</p> <p>Figure 9</p> <p>Item 'd'</p>	<p>When this junction is redesigned for the long-term (once the road is busier with traffic from the new residents) it is key to consider that any traffic light control (or similar measures) at this junction could cause traffic to be backed up and prevent existing residents exiting from their driveways onto the HHR.</p>	<p>As per the response above, the detailed design of the junction improvement in this location (Harvest Hill Road/Braywick Road) has not been determined yet. Concern noted.</p>
<p>6.3.27</p> <p>Figure 9</p> <p>Item 'g'</p>	<p>If a pavement were to be built on both sides of Harvest Hill Road a place for existing residents to place their bins on collection day will need to be built in to the plan so that they do not block the new pavement / cycle lane</p>	<p>Noted. This will need to be addressed in planning applications for the developments.</p>
<p>6.3.27</p> <p>Figure 9</p> <p>Item 'j'</p>	<p>Whilst the location of the access point j is noted, the further detail is considered superfluous at this stage. Building scale and orientation within the site will be necessitated by the requirements of operators, within the context provided by the plan of seeking a gateway scheme.</p> <p>Since the whole Triangle Site is within a single ownership this will provide scope for the co ordination of development within the submission of planning applications. This ability for a single application to cover the Triangle Site and the ability to provide an overarching masterplan means that significant elements of the current draft SPD are considered unnecessary;</p>	<p>The SPD provides little detail at this point in relation Fig 9 item J.</p> <p>It is important for the SPD to provide appropriate guidance to guide development and infrastructure provision and it is considered that it does. The need for the SPD and its guidance has not been overtaken by the evolving needs of the Borough's businesses.</p>

	especially where this has been overtaken by the evolving needs of the Borough's business.	
6.3.29	Mentions the possibility of improved East/West road links south of Maidenhead. Unless a corridor is safeguarded for such a link this will presumably be impossible. Suggest withdrawing paragraph 6.3.29 and provide further detail to properly upgrade Harvest Hill Road.	The Local Plan and the SPD are not proposing new road links but are proposing measure to improve accessibility and links by other non-car modes, particularly walking and cycling (eg an east/west walk/cycle link alongside Harvest Hill Road). As such, no need to safeguard a corridor.
6.3.29 – 6.3.31	An admirable ambition but it is unlikely to encourage much of a reduction in car ownership on site. Vehicular movement has to be accommodated as part of enhancing permeability	Agree that vehicular movement does need to be accommodated within the development.
6.3.31	6.3.31 deals with the Harvest Hill Road corridor. Our understanding is that RBWM will lead on the delivery of coordinated proposals for the corridor. This section should make clear that RBWM will lead on this aspect.	It is the Council's intention to lead on the delivery of proposals for the corridor, notably the East/West cycle link along Harvest Hill Road – this is made clear in the "delivery" column in Appendix 2 for this item.
6.3.31	Approach to Harvest Hill Road – Harvest Hill Road Corridor: It states under the third bullet point: <i>"To create an attractive, diverse, safe and inviting corridor that shifts mode of travel from vehicular to a more people focused approach"</i> . Surely, this should state <i>"that complements"</i> as access roads will continue to be required, particularly for elderly population?	It is clear from the SPD and the design principles that vehicular access will still be required and planned for, but the emphasis should be about shifting the approach to a more people focused one.

<p>6.3.31 p.55 'd'</p>	<p>Individual TPO trees may prevent segregated cycleway and generous pedestrian public realm on both sides of the carriageway. Consider the best location for an east-west cycleway would be along the north side of Harvest Hill Road. Do not consider there to be a need for one on both sides of the road, and p.64 refers to a “new segregated walking/ cycling route along the north side of Harvest Hill Road”.</p>	<p>Agree that north side of Harvest Hill Road is the best location for an east/west cycleway, and that a cycleway is not needed on both sides of the road.</p> <p>Amend to indicate that the preferred location for a segregated walk/cycle route is on the north side of the road.</p>
<p>6.3.1 – 6.4.1 + 6.6.1 + 6.6.12</p>	<p>More needs to be done to Harvest Hill Road than currently shown, including the junctions with Braywick Rd and Shoppenhangers Rd where both need right turns.</p> <p>Consider creating another access onto Shoppenhangers Rd (current golf course entrance is tight)</p>	<p>The SPD (Appendix 2) indicates a need to improve the Harvest Hill Road/Braywick Road junction – the detail of that improvement will need to be developed as part of the transport assessment for planning applications. The transport assessment will also need to consider the Harvest Hill Road/Shoppenhangers Road junction.</p> <p>Creating another access onto Shoppenhangers Road in addition to the golf course entrance would involve third party land/property.</p>
<p>6.3.33</p>	<p>Cannot achieve this statement without improving Harvest Hill Road at the eastern section where it is narrow, twisty and steep</p>	<p>There is limited scope to improve the road in this location due to properties on either side of the road. It is important to consider that the road will perform a different role in the future than its current role, with slower speeds throughout as it will go through the heart of a new residential area.</p>
<p>6.3.33</p>	<p>A substantial upgrade of Harvest Hill Road will be required if no other link road provided. A 20mph speed limit and footpath on one side of the carriageway will not be sufficient. The entire road will require widening, straightening, roundabouts, lighting and surfacing.</p>	<p>The character of Harvest Hill Road will change when development comes forward, with traffic slowing and responding to a different context. A new link road is not required.</p>

6.3.33 Figure 12	Object to the requirement that the green spine should be greater in width than Harvest Hill Road. Do not agree it is necessary or justified.	Would re-affirm the intention set out in paragraph 6.3.39 with regards to the “legibility of the green spine to the north and south” and it being “promoted as the preferred choice for movement for residents on both sides of Harvest Hill Road.” It is considered necessary and justified on the basis that “The continuity of the green spine helps overcome the barrier of the road corridor and ensure the cohesion of the whole community across the Harvest Hill corridor.”
6.3.38	Regarding continuity of the green spine as it crosses Harvest Hill Road (6.3.38), it is vital that this at-grade crossing with pedestrians and cyclists having clear priority in both directions.	A careful design solution is required at this location to ensure continuity of the green spine. Add sentence to indicate that a careful design of the crossing point and associated highways solutions are necessary to ensure the continuity of the green spine and pedestrian and cycle safety and legibility are maintained.

Masterplanning and Design control

Para. No.	Summary	Council Response
6.3.43 – 6.3.45	Paragraph 6.3.43 and bullet points at 6.3.45 – The wording of these paragraphs should be reviewed and reconsidered. Design Codes will not be appropriate nor required for every planning application. In some instances, including in the case of ‘Land South of Manor Lane’ (ref: 22/01717/FULL), the relevant information will be included within the Design & Access Statement which accompanies the planning application. This demonstrates how the land use and design matters have been considered and how delivery will accord with the Borough Local	The text in the SPD recognises that landowners and developers will bring forward proposals in different ways and at different scales. All sites should however adopt a consistent approach to help support the overall objective of securing comprehensive and well considered proposals. Masterplans and Design Codes are well known and used tools to help articulate and enable good design to be secured. They help in the consideration of the relationship of a site to its wider context, local character, and other important elements that contribute to placemaking.

	Plan, draft SPD and other material considerations. Accordingly, these sections of the draft SPD should be revised to reflect that Design Codes will not always be necessary.	<p>For larger multi-phase proposals Site Wide Masterplans and Design Codes will be very important and the Council will need to formally consider and approve them as part of any overall sequence of evolving detailed proposals.</p> <p>For smaller sites which are single phase and where material is submitted in detail it is appreciated that aspects which may be otherwise covered by a Site Wide Masterplan & Design Code are likely to be integrated into the detailed design drawings/material that are to be considered for approval.</p> <p>Amend text to acknowledge that for such single phase & where detailed proposals are set out, the ‘Design & Access Statement’ could be used to explain the masterplan and overall approach to detailed design for the proposals, covering matters similar to that which would otherwise be contained in a separate Design Code.</p>
6.3.50-6.3.54	Paragraphs 6.3.50 – 6.3.54 – As above, these paragraphs should be revised to acknowledge that Applicants may include the relevant detail within a Design & Access Statement and not every application should be required to submit a Design Code. If a Design Code is required, it should be limited to Custom Build/ Self-Build dwellings only. Additionally, detailed schemes should not include Compliance Checklists as suggested at paragraph 6.3.53. This would be illogical for detailed planning applications, where any such checklist would just repeat information already submitted as part of any application. This is an unnecessary and prescriptive addition.	<p>The requirement for applicants to need to show how they have considered and comply with policy and guidance set nationally and locally, including via the SPD, will be retained for all applications.</p> <p>Amend text of para 6.3.50 to acknowledge that for smaller sites which are single phase & submitted in detail, then the accompanying ‘Design & Access Statement’ could explain the masterplan and overall approach to detailed design. This would replace the need for a separate or additional ‘Compliance Checklist’ for this type of application/approach.</p>
6.3.46	Suggested changes to text: Site Wide Masterplans and Design Codes should be submitted alongside and as part of supporting material related to the relevant planning application/s. For larger sites with subsequent	The requirement for such material to be required by condition and needing to be approved by the Council ‘prior to’ the approval of reserved matters is an important step to allow the Council to ensure that such matters are properly considered and agreed before

	<p>future phases, it may be appropriate for the preparation of Design Codes for any future sub-area or phase to be required by condition to be submitted and approved by the Council as part of the prior approval of reserved matter applications and commencement of development on that sub- area/phase. A summary of how the overall process is provided in Figure 13 below.</p>	<p>applicants embark on detailed design work. This is considered a typical and reasonable approach to enable a sequenced evolution of detailed design, avoiding risk of retrospective consideration or justification.</p> <p>The wording does not preclude applicants from submitting such material at the same time of reserved matters applications should they so wish.</p>
6.3.45	<p>The SPD should allow for individual proposals for sports and leisure uses to be brought forward on Braywick Park (AL15) without requiring a 'site-wide masterplan' or any design codes. Such requirements would be disproportionate and unnecessary given the separate nature of any such proposals to the masterplanning of a large-scale mixed-use development to the west of the A308 Braywick Road.</p> <p>We therefore seek the inclusion of additional bullet point in paragraph 6.3.45 of the SWMF SPD to clarify RBWM's approach for any such proposals.</p>	<p>All proposals will need to demonstrate how they have considered and comply with policy and guidance set nationally and locally, including the need for high quality design and placemaking as required by the Borough Local Plan and SPD.</p> <p>The use of masterplans and design codes are well known and used tools and can apply to all forms of development.</p> <p>It is acknowledged that the level of detail may vary depending on the nature of different proposals, and therefore will be considered based upon their specific context and the nature of development that they relate to.</p>
6.3.42 – 6.3.49	<p>Could usefully include a reminder of the advantages of community/stakeholder engagement as part of the process.</p>	<p>Agreed</p> <p>Amend by including additional text to para 6.2.45 to state “All proposals will need to have evolved with community and stakeholder engagement, and demonstrate how this has informed the overall approach.”</p>
6.3.54	<p>Compliance checklist implies adherence by the developers. This supplementary document uses soft words like 'should/, 'can', etc. - implying the clauses are optional rather than obligatory to apply</p>	<p>The Compliance Checklist process is intended to provide a mechanism by which applicants can consider and explain how their proposals accord with an approved Design Code. The SPD is setting out further guidance on the overall process.</p> <p>Any proposal would ultimately be considered on its overall planning merits.</p>

		<p>The language used is because the SPD guidance and not policy (which is contained in the Local Plan). The SPD cannot write new policy where more forceful language might be appropriate.</p>
6.3.56	<p>Since most of the fundamental design decisions have already been taken by the Council/developer and incorporated into policy there is no point in a design review at that stage.</p>	<p>The South West Maidenhead area contains significant development of a strategic nature and at a key gateway location into Maidenhead.</p> <p>The role and purpose of any design review process would be to consider how proposals align with and accord with the placemaking policies and ambitions as set out in the Borough local Plan and this SPD. By suggesting these be undertaken at pre-application stage it will help to guide and inform the preparation of applications to ensure they are appropriately meeting the policy requirements.</p>

Section 6.5 Community Needs

Paragraph Number	Summary of Representations	Council Response
6.5.1	Housing Mix Box – the 50% family housing 50% flats is not consistent with the Local Plan and are inappropriate. The SPD cannot create new planning policy	<p>Noted. It is recognised that this box should link more closely to the policy position in the Local Plan, particular reference to the Berkshire Strategic Housing Market Assessment (SHMA) mix for larger units and the evidence base that indicates what an appropriate mix might be in this instance.</p> <p>Update the box and supporting text to refer more clearly to the policy and supporting evidence, including the SHMA and the proforma. Include more evidence on housing mix in an Appendix (see new Appendix 3).</p>
6.5.2	<p>In order to achieve 2,600 dwellings within the Placemaking Area “it will be necessary to ‘blend’ flatted development and family housing throughout the Placemaking area.”</p> <p>It is not sufficiently precise or justified to require a lower proportion of flats on the southern part of the site and would not reflect the aim of providing mixed communities. Suggest the wording should be changed to “a lower provision of flats and greater emphasis on family housing in the area south of Harvest Hill Road.”</p>	<p>See response above. Justification for the mix referred to in the SPD should be more closely linked to the SHMA and other evidence. It should be noted however that the Local Plan policy indicates high density development around the local centre to reflect the area’s accessibility and to contribute to its vibrancy.</p> <p>Update housing mix section to refer more directly to the relevant Local Plan policy and hence where the mix 3 and 4 beds units will increase and 1 and 2 beds will decrease</p>
6.5.4	Reference needs to be made to viability to align with Local Plan policy	This is intended to be a very high level summary of the main policy requirements. Reference to viability is not necessary here – the detail of the policy and NPPF is available if people wish to read the whole policy.
6.5.6 Table 1	The evidence supporting the proposed mix should be made publicly available	Agreed

		See new Appendix 3 for evidence in support of the proposed affordable housing mix
6.5.6	Add extra text to end of paragraph to provide flexibility re alternative affordable mixes to be evidenced by local circumstances/market conditions at the time, given the long build period of the development	Agree some flexibility would be appropriate, but based on changes to affordable housing need. Add sentence to provide some flexibility on affordable mix if needs evidence changes over time
	Community Uses suggested such as: Exhibition Space for touring exhibitions, performance space for local musicians, outdoor market, pop-up shops, charity events, social (such as specialist interest groups meeting place, parents' coffee mornings, physical and mental health – such as yoga classes, addiction meeting groups, counselling venue, place of worship, arts venue, political meeting place) Suggested that any working group comprising community representatives, groups and stakeholders established to consider the multi-purpose community building would visit examples of other community buildings.	Noted – thank you for the suggestions.
	Noted there is no church or pub proposed in the plans, yet traditionally the church, pub and post office were seen as the heart of a village / small community. There does not seem to be any up to date vision in the document of what gives life and heart to a community.	Noted – the developer will need to work up the specification for the local centre, including the community facilities, with community representatives, groups and stakeholders
6.5.8 to 6.5.11	It is good to see accessible and adaptable dwellings, wheelchair accessible and self-build / custom build included in line with BLP policy H02 but disappointing that there is no specific mention of point 5 of H02 on community-led housing approaches.	Agree it would be helpful to refer to this. Add reference to Policy HO2 re community led housing approaches
6.5.11	Apparent typo - 'to' should be deleted	Agreed Delete 'to' in first sentence
6.5.13	If the school is not to be delivered for 11 years, the space should be made available to the public in the interim	Noted

6.5.13	The ownership of the multipurpose Community Building through a CLT going forward could bring long term benefits to the community. Any future income could be used for community benefit (virtuous circle of funds).	Noted
6.5.14 - 6.5.18	Suggest would be more successful to site local shopping centre with community building and medical facilities	That is the intention. Health provision on the site is being explored.
6.5.19	This development is too dense to provide any meaningful open space, in particular there will be a net loss of public open space considering 132 acres of the golf course land is currently public open space though it is currently leased by the Golf Club.	Noted. The development would have to meet Local Plan open space standards. The Local Plan policy and design section of the SPD outlines the importance of there being a strong green infrastructure framework to the development
6.5.20	Refine paragraph to indicate that facilities could be shared with nearby sites given improved connectivity in the development area	It is for developers to demonstrate how open space standards will be met across the development in a comprehensive and coordinated way

Section 6.6 Connectivity

Paragraph Number	Summary of Representations	Council Response
6.6.2 Box	Make clear the improvements along the Braywick Rd should be linked to the Triangle site as they are solely required to link that site to the town centre	This is already made clear in section 7 in the paragraphs relating to the Triangle site contributions.
6.6.3	Cycling now and in the future will increasingly include battery powered bikes and scooters. Each dwelling must have secure private storage for these which must include appropriate low cost charging points.	The box at paragraph 6.6.6 specifically refers to the provision of secure high quality parking facilities. Add reference to the need for charging points for electric bikes as part of cycle parking

6.6.4	Provide more details of the refurbishment of the bridge over the A404(M) should be provided – if intention is to widen, this will require new structure and will be complex	There are no more details at present but these will be worked up in due course, including consultation with National Highways. An indicative cost of the works is provided in Appendix 2
6.6.5	The last sentence of this paragraph indicates that if the bridge is not feasible and an alternative is promoted, this should include benefits for public transport users alongside pedestrians and cyclists. However, neither site specific proforma in the Local Plan for AL13 or AL14 requires consideration of public transport. This must therefore be omitted from the last sentence of the paragraph to ensure consistency.	15. (h) of the Site Allocations Proforma for AL13 states: “Alternatively, if demonstrated not to be feasible, alternative sustainable access options would need to be explored and implemented that provide comparable benefits for the movement of pedestrians, cyclists and public transport users in the area.” Clause 5 of the Site Allocation Proforma for AL14 states: “Promote sustainable travel and mitigation measures such as improved public transport provision and walking and cycling routes ...” and clause 6 states: “Ensure that the development is well-served by public bus routes/ demand responsive transport/ other innovative public transport solutions , with appropriate provision for new bus stop infrastructure, such that the bus is an attractive alternative to the private car for local journeys”
6.6.6	The alternative to the bridge for the green spine linking AL13 and AL14 is poor. Crossing the Ascot Road, A308 Windsor Road, The Bingham, the entrance / exit to the petrol station and both carriageways of the Braywick is not the green and attractive walk to work anticipated. What are these crossings going to do to traffic flow on and near to the Braywick Road roundabout? Has this been factored into the traffic modelling used to inform the plan?	It is considered that the alternative measures will be provide a good alternative to the bridge, enabling connections to be made to both the AL13 housing site and to the town centre. The crossings are not factored into the traffic modelling. It is recognised that crossings will affect traffic flow but it is necessary to balance the needs of all users. More detailed design work needs to be done but it can be expected that, even with the crossings, significant improvement in traffic flows would be achieved by the proposed Braywick Roundabout improvements.
6.6.10	There is no budget for new bus services, but even if it were, it would not be fair for this development to benefit from cheaper travel unless the whole of the Borough benefitted from cheaper travel.	Developers would be expected to make a financial contribution towards establishing new/diverted bus services. A trial cheaper fare scheme would be a means of encouraging greater patronage. It would encourage new residents to use buses early on, and hence encourage modal shift.
	Electric cars still result in non-exhaust emissions and as such are only part of the answer to pollution	Noted. The Local Plan and the SPD also set out proposals for sustainable travel measures to reduce reliance on the private car and

		hence limit emissions. The location of particularly the northern neighbourhood of the AL13 site close to the town centre and train station, and inclusion of a local centre to reduce, also encourage trips by non-car modes, thereby helping to reduce emissions.
	Add “where feasible” at end of para 6.6.10 as it is dependent on the bus operator	It is not considered necessary to caveat in this way. Clearly we will need to work in partnership with bus operators. The current wording already provides flexibility by indicating that these are the measures that should be considered.
6.6.12	The box should state which of the schemes RBWM will be taking forward.	The table in Appendix 2 sets out who it is anticipated will take forward the various infrastructure schemes
6.6.12	Development at AL13 and AL14 should not wholly fund the junction improvements at Holyport Road / Windsor Road, and it is noted that the detail of any improvement to M4 8/9 is not known and therefore the extent of the cost uncertain. It is therefore suggested that the introduction to the list of improvements should state: “As part of mitigating the impact on the wider road network, contributions to provide/fund improvements...”	Disagree. See more detailed responses in relation to comments in section 7 about the approach to funding necessary infrastructure provision and the fact that SW Maidenhead development will also have a wider impact.

Section 6.7 Sustainability and Environment

Paragraph Number	Summary of Representations	Council Response
6.7	Draft SPD only states a ‘preference’ towards net carbon being achieved on site. Instead, the Council should demand that the new developments are committed to (measured) net zero, or Passivhaus	<p>The SPD has to work within the framework set out in the Local Plan policy and other relevant strategies and policies that are set out in this section of the SPD.</p> <p>The SPD states not just that it is a preference but also an expectation – i.e. that it ought to be capable of delivery on site.</p>

6.7	Developers are “encouraged to consider” the whole life carbon impact of their development. This wording is vague and does not demand anything from developers. The Council should carry out assessments using the targets set by RIBA. Offsetting could be encouraged, after all reduction measures have been exhausted.	<p>The SPD has to work within the framework set out in the Local Plan policy and other relevant strategies and policies that are set out in this section of the SPD. As such we cannot make this a hard requirement, but encourage developers to move towards this approach.</p> <p>Amend wording re ‘whole life carbon’ to encourage developers to work towards this and that this will be given significant positive weight in determining applications</p>
6.7	Reference to “consider whole life carbon” not referenced in Interim Sustainability Statement. Cannot introduce new policy	<p>Noted</p> <p>Update text in box to ensure this does not read as a policy but make clear what the Council’s objectives are and the weight it will attach to this issue in determining planning applications.</p>
6.7	<p>‘net zero’ is not well defined in either the ‘Interim’ Position Statement or section 6.7 of the draft SPD. The ‘Interim’ Position Statement should not be assigned the weight of an SPD, as section 6.7 appears to suggest.</p> <p>The definition of ‘net-zero’ and the ways it could be achieved should be considered as of the Sustainability and Climate Change SPD.</p>	<p>The SPD indicates that it is net zero (operational).</p> <p>The SPD does not indicate that the Interim Position Statement carries the same weight as an SPD.</p> <p>Agree there is scope for the Sustainability and Climate Change SPD to address such matters further.</p>
6.7	An approach to mitigation of light pollution throughout the placemaking area should also be established due to, among other things, the impact this can have on biodiversity. The SPD should specify that any outdoor lighting should be assessed for harm caused in accordance with zone E2 (low district brightness).	<p>Light pollution is addressed in Policy EP3 of the Local Plan (including in the supporting text the different zones). Policy EP3 is referenced alongside other environmental policies at paragraph 6.7.25 of the SPD. It would, however, be helpful to reference light pollution in the preceding paragraph.</p> <p>Amend paragraph 6.7.24 (second bullet point) to refer to light pollution</p>

6.7	Air Pollution: The draft document does not acknowledge the increase in air pollution that will be a consequence of new residential and non-residential areas. Due to proximity to town, station and long stay car parks, car-free neighbourhoods could be considered, with a target number of dwellings being car free. Green barriers to polluting areas are mentioned around the new neighbourhood but should also be considered around the school as schools are generally exposed to higher levels of air pollution.	<p>Paragraph 6.7.24 of the SPD recognises that air pollution is a potential issue alongside other forms of pollution and the relevant policies in the Local Plan that will help address this are referenced.</p> <p>Agree that car-free neighbourhoods could be considered in locations close to the town centre/station.</p> <p>The landscaping scheme around the school can consider buffers at the application stage, although consideration will need to be given to where any pollution sources might be located.</p>
6.7	Biodiversity: 10% net gain is very low, and the wording of the document permits this net gain to happen off-site. Instead, the document should mandate at least 10% biodiversity net gain on site.	10% is the standard set by Government that is due to come into force in November 2023, although the Council believes that developers should be applying this approach at the earliest opportunity.
6.7	Access to local public transport, including bus stops, should be mandated	This is included in section 6.6 of the SPD.
6.7	Paragraph 5.7.3 of the SEA states that the introduction of 2,600 new homes will inevitably increase energy consumption, traffic and pollution, however, SPD has not used any tools to calculate the AL13 impact	The SPD includes a range of measures to minimise energy consumption, notably a series of sustainable travel alternatives to the car as well as setting out an approach of zero carbon in relation to new buildings. The SPD does not seek to prescribe an overall carbon “assessment” but does set out the above measures.
6.7	No reference in the SPD to the River Basin Management Plan	Paragraph 6.7.22 refers to Policy NR1 of the Local Plan and the supporting text to that policy (para 12.2.9) refers to the River Basin Management Plan. It is not possible to refer in this SPD to all the detailed elements contained in NR1.
6.7.1	This plan, and indeed RBWM, need to demonstrate they are able to meet the targets set out in the Environment and Climate Strategy. This would require major modification of this SPD to remove the loss of mature woodland and minimise, if not cease, all development on green space, and in particular the golf course land.	The site is allocated for residential development for approximately 2,600 homes in the Local Plan and this provides the policy basis for SPD, along with the detailed proforma for the site set out in the Local Plan. The proforma provides an extensive list of policy requirements, including in relation to trees and green space, and the additional guidance in this SPD helps to deliver on those policy requirements.

6.7.5	Developers must not avoid community payments due to viability – if the carbon fund payments are not mandatory and measured in the SPD then what would prevent developers resisting payment	The Council has to have regard to viability considerations in determining planning applications.
6.7.5	This paragraph encourages developers to consider the ‘whole life carbon’ impact of their development. However, the SPD has not outlined how the whole life is to be measured, as such there is no means of proving compliance. Without the evidence on the measures and mechanisms to demonstrate compliance with this objective there is no information to confirm it will not harm deliverability. It must consequently be omitted.	Disagree. Developers are encouraged to work towards a ‘whole life approach’ and can discuss with the Council at the time of their application how this could be measured, including by reference to good practice. The Sustainability and Climate Change SPD may be able to consider this further.
6.7.6	Energy Statements should reflect Building Regulation methodologies. Any energy and emissions reductions beyond these standards should be supported with sufficient evidence stating why national standards need to be enhanced locally. In the absence of any evidence why higher standards are both necessary and will not undermine deliverability, this paragraph must be omitted.	It is clear that developers need to be working towards achieving higher levels of carbon reduction in order to work towards net zero targets. The SPD sets out the Council’s existing policies and strategies in this respect, and the objectives it wishes to achieve through this SPD in this respect. The wording in the box in para 6.7.1 has been updated to reflect this approach. The text in 6.7.6 signposts developers to where they can find further guidance to help meet the Council’s objectives.
6.7.8	Refer to transitional arrangements	This is not appropriate. The transitional arrangements only apply to building notices submitted before 15 June 2022 and required work to begin by 15 June 2023. This will not apply to the main development sites in SW Maidenhead area which do not yet have planning permissions. Amend paragraph 6.7.8 to refer to June 2022, not July 2022
6.7.8	Suggest every dwelling should have a private parking space and every parking space should have a charging point connected to that household.	The detailed parking arrangements will be considered at the planning application stage and will vary depending on the size of the dwelling and its access to services and facilities. Paragraph 6.7.8 makes clear that electric charging points are now required for every new residential building through changes to the Building Regulations.
6.7.9	Amend to refer to provision elsewhere in the borough, or through a net gain credit scheme	Amendment not appropriate as it could involve mitigation being provided outside the Borough which is not considered appropriate.

6.7.9	Policy NR2(3) only requires a net gain in biodiversity and does not specify the minimum of 10% the SPD does. The minimum 10% only becomes a requirement once the relevant section of the Environment Act 2021 is in force. The SPD should therefore be revised to acknowledge this.	The draft SPD already includes a footnote to this effect, but the main box could also reference this. However, we believe that developers should be applying this at the earliest opportunity. Update box to indicate that the 10% BNG requirement is being introduced shortly
6.7.9	The SPD should be revised to acknowledge that AL13 and AL14 are separate allocations and as such the BNG expectations are to be achieved on each site.	This is not necessary or appropriate. Policy QP1b(5)h) requires biodiversity net gains across the area (i.e. the placemaking area) and doesn't distinguish between the two allocated sites. 6.7.9 does distinguish between the two sites in terms maximising biodiversity provision through on-site mitigation within those allocated areas, and then across the wider place making area, consistent with Policy QP1b.
6.7.9 (BNG text box)	The hierarchy approach represents new policy rather than building on or providing more detailed advice or guidance on policies in the adopted local plan. The hierarchy approach to identifying off-site alternatives to addressing BNG represents new policy rather than building on providing more detailed advice or guidance on policies in the adopted local plan. The proposed policy will have an impact on the wider pattern of development in the district. The Planning Code requires that this should be considered through the development plan process and be the subject to independent examinations.	The first two bullet points in the box are consistent with Local Plan Policy QP1b(5)(h) and the site proformas for AL13 and AL14 which are themselves policy. The latter part of the text in the box would benefit from emphasising the importance of delivering the best biodiversity outcome whilst still securing provision in proximity to the placemaking area where possible, and if not then elsewhere in the Borough. Amend text in Box to reflect the comment above.
6.7.9 (BNG text box)	The hierarchy set out would operate to constrain the number, quality and types of habitat that can be delivered off site and fails to recognise the role that habitat banks can play in contributing to Biodiversity Net Gain.	As a matter of good planning practice, it is essential that the biodiversity impacts of development (and any net gain) are mitigated/provided for locally. Indeed, this principle is recognised by the Government's consultation Biodiversity Net Gain Regulations and Implementation (January 2022) which sets out that "Policy and guidance will encourage off-site biodiversity gains to be delivered locally to the development site..." (page 56) and highlights the "spatial hierarchy preference for local enhancements" (page 55).

6.7.9 onwards p.76-77	The principles set out on pages 76 and 77 are good and do not need changing but the design does not implement them. There needs to be a fundamental review of the design of the site to ensure all trees and habitat areas are protected and enhanced.	Noted. It would not be possible to deliver about 2,600 homes and other uses whilst protecting all trees. However, significant new tree planting will need to be carried out in the SW Maidenhead area.
6.7.9 onwards p.76-77	The biodiversity value of the site must be accurately established to inform the design of wildlife corridors and areas for habitat creation.	Developers will need to undertake full ecological surveys to establish the biodiversity value of the site which will inform the design of wildlife corridors, areas to be protected and areas where habitat can be created.
6.7.9	SPD requires more information on what a 'biodiversity net gain credit scheme' would look like	This is too detailed to include in the SPD.
6.7.9 & 6.7.14	Trees should be retained. Priority should be given to development proposals which respect the existing tree pattern and concentrate buildings on the fairways. A commitment to this by the Council might increase support from residents for this development. Developers should be required to identify exactly which wooded areas they would be intending to remove and why. The retention of Rushington Copse is a small percentage of the trees on site. Existing trees and hedgerows which extend from the Copse to form a border along neighbouring properties, particularly along Rushington Avenue, where the new housing will be relatively dense close to the town centre, should be retained to provide green lings for both new and existing residents.	The Local Plan proforma for the site sets out the main requirements in relation to trees on the site and this is reflected in the SPD. The developer will need to undertake a detailed tree survey to understand the value of the trees on the site and this should inform the detailed design and layout of development, having regard to the proforma requirements. The Local Plan proforma indicates that tree and landscape buffers along the site boundaries of the AL13 site should be retained and reinforced.
6.7.11	No evidence to suggest southern green fringe may be capable of accommodating biodiversity net gain and no land agreements in place	The text is identifying an opportunity to maximise the level of biodiversity provision on the AL13 site allocation, in line with the principles set out in the SPD and policy in the Local Plan. Developers should work together to achieve this.
6.7.11	Suggest the SPD more explicitly recognises the challenges of providing BNG across the Placemaking Area.	The degree of challenge will not be known until developers submit their planning applications and accompanying biodiversity net gain assessments. The approach set out allows for off-site solutions if necessary and justified.
6.7.12	Minor rewording proposed to refer to mitigation and enhancement	Agreed. Amend reference to mitigation and enhancement

6.7.14	Change to metric 3.1	Agreed. Amend reference to metric to refer to 3.1
6.7.15	Loss of trees implicit in the SPD is contrary to RBWM Environment and Climate Strategy.	The Local Plan AL13 allocation for the site was approved with an indicative dwelling number for the site and a series of policy requirements in the proforma to assist with mitigating its impact, including in relation to trees.
6.7.15	Rather than removing trees the development brief should identify opportunities to increase tree canopy cover.	Paragraphs 6.7.15 (Box) indicates the need for significant new tree planting in the SW Maidenhead area.
6.7.15	Concerned that the fate of trees in AL13 not adequately protected. The BLP policy NR3(4) does not restrict protection to mature trees only, nor does it call for retention 'where possible', but rather calls for protection and retention where harm is 'unavoidable'. The stronger wording of the BLP should be replicated in the SPD.	The wording in the SPD summarises the approach set out in the proforma for the AL13 site in the Local Plan.
6.7.15	The SPD should be modified to protect the ancient woodland at Rushington Copse with a 100 metre planted buffer (other comments suggest 50m)	The proforma in the Local Plan for the AL13 site requires the protection of Rushington Copse including buffer zones where necessary. 100m buffer zone would be excessive, having regard to the need to accommodate development.
6.7.15	Concern that any loss of mature trees and woodland would be incompatible with the requirement to deliver biodiversity net gain. Where ancient woodland or veteran trees are lost or damaged there will always be net loss of biodiversity and it is impossible to secure net gain.	It is a policy, and soon to be legal, requirement to deliver biodiversity net gain. The SPD sets out further guidance on the approach to achieving this in the context of the SW Maidenhead area.
6.7.15 and 6.7.16	Concern about the possible impact of development on Rushington Copse. The draft SPD is lacking in detail to ensure the retention / protection identified in AL13 and AL14 happens in practice.	See response above re the need to protect Rushington Copse and include buffer zones where necessary. The detail of buffer zones and retention/protection measures will need to be provided at the planning application stage in the light of detailed tree surveys.
6.7.15 and 6.7.16	Preference is to create new habitat, including native woodland, around existing ancient woodland. This will help reverse the historic fragmentation of this important habitat, contribute to biodiversity net gain, and can also provide accessible green space for nearby residents.	Noted.

6.7.16	Surveys of existing trees and woodland, and habitat opportunity mapping for new woodland creation should be completed before any firm decisions are taken on the scale, location or layout of development on the site.	Tree surveys will be required to inform layouts and the ultimate scale of development included in any planning applications.
6.7.16	<p>It is noted that the Ancient Tree Inventory (ATI) for the area is not complete. Recommend an exercise to complete the ATI (which lists ancient, veteran and notable trees outside woods) across any sites allocated or proposed to be allocated for development, in order to comply with NPPF p.180c.</p> <p>Recommend that if the scale of development proves incompatible with legislative requirements (to protect ancient woodland, ancient/veteran trees, contribute to local nature recovery networks and deliver biodiversity net gain) then the scale of development should be adjusted accordingly.</p> <p>Requested change in wording to require surveys as an essential prerequisite to bringing forward designs for the site.</p>	<p>Developers will need to undertake tree surveys and this will identify the value of trees on the sites.</p> <p>Regard will have to be had to paragraph 180c of the NPPF in relation to any ancient woodland, ancient or veteran trees in the determination of planning applications.</p> <p>The wording already highlights that the tree surveys are very important. Policy NR3 that provides more detail on the policy requirements regarding tree surveys, is referenced in paragraph 6.7.16 of the SPD.</p>
6.7.16	<p>A tree survey would accompany any application on the site, as such the reference to the value of the clump can be omitted from the SPD as this would be thoroughly assessed through the determination of a planning application consistent with policy NR3.</p> <p>It must be acknowledged in this section ‘the clump’ is not ancient woodland.</p>	<p>The paragraph already highlights that tree surveys will be very important – this applies across the area. No need to highlight particular area.</p> <p>Amend to take out reference to the golf course and the Clump.</p> <p>The Clump is identified as ancient woodland on the Ancient Woodland Inventory.</p>
6.7.18	Berkeley’s Spring Hill Development proposals submitted for full planning consent do not include any green infrastructure for food production	That is a matter for the consideration of the planning application, not this SPD.
6.7.19	The SPD should insist that all drainage ponds and other infrastructure associated with the development will be provided within the AL13 site boundary.	The detail of the sustainable drainage measures are best addressed at the planning application stage.

6.7.19	Paragraph 4.8.1 advises that AL13 is within Flood Zone 1, whereas this paragraph suggests there are areas of flood risk on both sites (AL13 and 14). Clarification requested on flood risk on AL13, otherwise requested it is omitted from this paragraph.	<p>Inconsistency noted. A small amount of AL13 is within flood zone 2. This is consistent with the statement in the Local Plan proforma (bullet point 19).</p> <p>Amend paragraph 4.8.1 to say that ‘almost’ all of AL13 is within flood zone 1</p>
6.7.21	The last sentence of this paragraph should be omitted to ensure consistency with national guidance regarding the acceptability and appropriateness of less vulnerable uses in flood zones 1, 2 and Development 3a.	Disagree – the last sentence is not inconsistent with the earlier statement about acceptability and appropriateness of less vulnerable uses. As part of the BLP Examination, the Council and the Environment Agency agreed that the extent (and therefore quantum) of any development suitable within these Flood Zones will need to be considered at the detailed planning application stage. The last sentence is consistent with this.
6.7.23	<p>Not identified why the impacts on the Scheduled Monument would be ‘minor’. Historic England’s comments suggest that any development could harm the SM as it is not possible for any new housing development to proceed without some form of flood / surface water scheme in place.</p> <p>Reasonable chance of further Mesolithic discoveries in the area</p>	<p>The SPD does not say this.</p> <p>Any high-level assessment by the Local Plan Sustainability Appraisal or the Strategic Environmental Assessment of this SPD would not be sufficient evidence at the planning application stage to conclude on the likely impacts of the scheduled ancient monument – further more detailed assessment would be required to support a planning application including, as referred to in the SPD, a setting study.</p>

Section 7 Infrastructure Delivery

Paragraph Number	Summary of Representations	Council Response
7	Concern regarding the funding gap - No current agreement between developers on the funding of key infrastructure. Agreement on infrastructure funding is a necessary precondition of a meaningful SPD. What happens if no equitable agreement emerges?	A key role of the SPD is to coordinate infrastructure delivery and funding. It therefore provides an equitable approach to funding infrastructure, including addressing the funding gap that it sets out. This will be secured through section 106 agreements linked to planning permissions that the Council will negotiate with developers.
7	Concerned that work is not sufficiently progressed to provide confidence to the infrastructure requirements, estimates or the apportionment of contributions across the South West Maidenhead sites. Suggest the detail presented in the SPD is limited to allow this work to conclude. Also suggest the SPD should be suitably and strongly caveated to the effect that ongoing work will impact on the final detail of the SPD.	The work provides sufficient level of detail for the purposes of an SPD. It is recognised that as more detail emerges (e.g., more detailed designs and/or costings) then the infrastructure schedule will need to be updated and the SPD provides for this by publishing updates to the costings and the funding gap on the Council's website. Furthermore, significant inflation means that it will be important to keep costs updated by indexing. Ensure SPD provides for updating of costs and the funding gap over time to take account of more up to date information of costs of schemes and to index for inflation
7	Consider it premature to conclude that there is a necessity for major improvements to J8/9 resulting from the AL13/14 sites.	It is prudent to allow for improvements to the junction including a limited contribution from SW Maidenhead development.
7	Risk that RBWM will struggle to appropriately evidence that the necessary infrastructure can be delivered under CIL and/ or s106 in accordance with Regulation 122 tests. Also concerned with the proposed delivery mechanisms and suggest that higher contingency allowances than would normally be deemed appropriate would conflict with Regulation 122 legality tests. The development should not be required to more than mitigate its own impact.	Local Plan policy requires comprehensive coordinated delivery of infrastructure and the SPD sets out a framework for doing that in a way that is considered to be consistent with CIL regulation 122. It provides a simple but comprehensive approach to ensure equitable contributions from developers. The SPD should explain this further. An alternative more bespoke approach to negotiating development contributions which would also be compliant with regulation 122, and this should also be set out in the SPD, but this is not the Council's preferred approach.

		Update the SPD to more clearly set out the simple comprehensive approach to contributions, making clear its compliance with CIL regulation 122, and also set out the alternative (not preferred) more complex approach.
7	Suggest that the starting point should be to calculate the level of on-site infrastructure that would technically be required from the schemes and any extra-over costs incurred would need to be addressed within some sort of equalisation / credit system, to ensure that the respective schemes are only required to meet their appropriate level of cost.	The SPD sets out such an approach, but because this is based on “ringfencing” Community Infrastructure Levy contributions to the SW Maidenhead area to deliver the most locally significant infrastructure, it is essential that SW Maidenhead developments collectively fully fund that infrastructure through CIL and section 106. SW Maidenhead development will have a wider impact than the infrastructure schedule set out in Appendix 2 of the SPD and the more complex approach referred to above would need to take account of these also in the more technical approach referred to in these comments.
7.1 Text Box	Review text box – cannot introduce new policies	It is consistent with BLP policy to fully mitigate impact of development so is not introducing new policy. However, given the changes referred to above, the statement in the box should be simplified. Wording in box simplified to reflect other changes in this section
7.1 and Table 2	All S106/CIL allocations need to be justified. RBWM’s playing pitch strategy and built facilities strategies are now out of date. These have been recommissioned and work should start in October 2022, this will give robust evidence needed when seeking contributions towards new sports infrastructure needed for the new community in South West Maidenhead. I would therefore suggest it is premature to put figures in table 2 for this, unless they are based on Sport England’s Sport Facility Calculator and Playing Pitch Calculator.	Agreed. It is considered that contributions to playing pitches will be required, but for the reasons set out in the comment, it is not appropriate to include a cost estimate in Appendix 2 at this stage, but to highlight that contributions are likely to be needed. Add text in section 6.5 (open space section) to indicate that financial contributions to playing pitch provision are likely to be required.
7.1.3, 7.1.10	Recommend the removal of the Precautionary Approach and instead suggest any contribution calculation is based on the direct costs of infrastructure, which includes appropriate allowances for risk and	It is right to be cautious about costings at this stage, particularly in the current inflationary environment. However, the Council has undertaken some work on the costs, particularly in relation to

and Table 2	contingency. Concern that the precautionary approach and additional £10m in Table 2 is not justified/seeking higher contributions than the base cost	<p>education, and considers that a combination of regular indexing of costs and updating of costs as further detail becomes available, will help to mitigate this risk. Use of the CIL Index which is the Government’s preferred approach to updating CIL charging levels is considered an appropriate way of indexing infrastructure costs.</p> <p>Remove the 10% uplift to the costs set out in Table 2 in the draft SPD but update costs where additional evidence is available, and index those costs to Dec 2022 using the CIL index</p>
7.1.2 – 7.1.5	<p>Add reference to the CIL Reg 122 tests for planning obligations – need to be careful the approach is compliant</p> <p>Will the developer build the infrastructure or the Council – if the latter, need mechanism for this and needs to be transparent arrangements to ensure costs are robust and justified</p>	<p>Agree it is helpful to briefly set out the policy and legislative background to s106 and CIL</p> <p>Include additional text section 7 providing brief policy and legislative background to CIL and s106.</p> <p>Appendix 2 provides an indication of who may deliver the infrastructure, and this has been updated with the latest information. As and when the schemes are brought forward there would be more detailed schemes/designs and related costings.</p>
7.1.5 & 7.1.23	<p>There are schemes outside of the SPD area which will generate impacts upon the Borough’s infrastructure and consequently these must also be acknowledged within the table which follows at 7.1.5. The need to consider impacts of development outside of the SW Maidenhead area must also be acknowledged within the split of development funding highway improvements as illustrated in table 4 (paragraph 7.1.23). Increases in traffic flows from other development is not included in this and therefore the proportions assigned to the development sites in SW Maidenhead are unjustified and inconsistent with the Regulations. They must therefore be revised to ensure that this consistency is achieved.</p>	<p>Noted. But there are also various forms of infrastructure outside of the SPD area that will be impacted by development in the SW Maidenhead area that SW Maidenhead development ought to contribute towards. The “simple comprehensive approach” set out in the SPD seeks to balance out these two factors in an equitable way, ensuring that the necessary infrastructure is delivered but without overly complex assessments and negotiations. This is the Council’s preferred approach.</p> <p>As referred to in responses above, it is recommended that the alternative more complex approach is set out in the SPD as well. This will involve wider and more technical assessment of impact on a range of different types of infrastructure. This is likely to delay development.</p>

7.1.10	A Regulation 122 compliance statement should be prepared which alongside the annual infrastructure funding statement sets out that infrastructure can be delivered whilst complying with Regulation 122	<p>The approaches set out in the final SPD to infrastructure funding are considered to be compliant with Reg 122. There is no need for such a statement but the infrastructure funding statement may provide updates as appropriate, and evidence regarding costs and receipts will be updated as appropriate on the website.</p> <p>Updated approaches to infrastructure funding are set out and are considered to be Regulation 122 compliant</p>
7.1.12 – 7.1.13	Land costs - Council has failed to demonstrate that the land north of Harvest Hill Road would not have given rise to the need for education/community facilities, regardless of the wider development. So it is not appropriate for developers of smaller sites to fund the land cost of a school	Disagree. The AL13 site is a single allocation for land north and south of Harvest Hill Road and it is right that landowners for different parts of the site contribute towards the land costs for the schools/community facilities – land costs for schools are a legitimate infrastructure cost. Historic allocations in an unadopted draft local plan are not material to this issue.
7.1.12 & 7.1.13	Regarding school and costs – clarity must be provided as to the level of costs per acre/hectare that have been reflected in the respective calculations.	<p>Agreed. Further work has been done on this.</p> <p>Update SPD to set out the cost of school/community land and add this to the infrastructure costs set out for the Council's preferred approach and to the costs for the individual infrastructure elements set out in Appendix 2. Also provide a cost per unit basis for the land should developers decide to adopt the alternative approach to infrastructure funding.</p>
7.1.13	The Council's initial improvements to the Braywick roundabout include a filter lane from the A330 onto the A308(M). The Council's reliance on this land to achieve highway improvements must therefore be considered in determining extent of site specific contributions from the AL14 site. This is not currently achieved.	The filter lane and hence the land are necessary to make the development of the Triangle site acceptable highway terms. As such there should be no adjustment to the level of contributions.
7.1.12 – 7.1.13	There needs to be a robust evidence base in place to justify the school provision being sought. The Council's own evidence indicates that the 7 FE secondary school is not intended to serve solely the AL13 allocation	Appendix 2 in the draft SPD made clear that not all of the funding for the secondary school would be sought from SW Maidenhead development. However further information to explain the pupil generation and costs would assist and is available.

		Include new Appendix setting out more evidence on pupil generation for the primary and secondary school and on costs
7.1.12 – 7.1.13	As more robust evidence is required on costs etc, this may delay the SPD and delay delivery	The final SPD includes additional and up to date costs and a commitment to keep them under review. Development need not be delayed provided it delivers a comprehensive and coordinated approach to infrastructure delivery, in line with the Local Plan policy
7.1.15 – 7.1.26	<p>Questions:</p> <ul style="list-style-type: none"> - How CIL monies are used to fund infrastructure works - How / whether s106 contributions can be required from the AL13 schemes to meet the ‘funding gap’ whilst complying with CIL Regulations 122; and - How the respective cost items have been calculated, including rates, measures and contingency allowances for works costs items and land values for costs towards school delivery 	<p>CIL money is available to fund infrastructure to support the growth of the area. The Council ultimately decides how it is spent. Appendix 2 of the SPD provides an indication of how it might be spent.</p> <p>It is completely appropriate to the Council to seek section 106 contributions in addition to CIL contributions to deliver the policy requirement for comprehensive and coordinated infrastructure delivery in South West Maidenhead. It is considered to be compliant with CIL regulation 122.</p> <p>Further information is included in Appendix 2, within section 7, and in new Appendix 4 in relation to costs, indexing and land costs</p> <p>Update section 7, Appendix 2 and include new Appendix 4 to explain the basis of the infrastructure costs</p>
7.1.21	The first two points include elements of duplication and should be consolidated into a single requirement for walking / cycling off-site	Disagree – these are two distinct elements, both of which are required.
7.1.21	<p>It is not agreed that the Triangle Site will account for 45% of traffic growth from the SW Maidenhead sites at Braywick Roundabout. This approach does not consider the impact of wider growth at the junction.</p> <p>This calculation of impacts is based on an assumption that AL14 will be delivered in its entirety for B2 floorspace (which is unrealistic – remains a difference between the Council and Promoters expectations of development mix at the Triangle site).</p>	<p>See response above regarding the impact of wider growth on SW Maidenhead infrastructure, and the fact SW Maidenhead will also have a wider impact on infrastructure beyond the area.</p> <p>The formula set out in the Triangle site contributions part of section 7 will mean that contributions will vary depending on the mix between B2 floorspace and B8 floorspace.</p>

7.1.23	<p>Lack of evidence regarding the derivation of the improvements specified.</p> <p>It is noted that no assessment has been provided that the level of contributions to be sought will not impact upon the viability and deliverability of the proposal.</p> <p>The lack of viability evidence with respect to the nature of potential infrastructure improvements has been a consistent matter raised through the Council’s preparation of the Local Plan and it remains unresolved in the SPD.</p> <p>No clear evidence the Councils expectations are realistic.</p>	<p>The junction improvements identified were also identified as part of the Borough Local Plan traffic modelling. The updated traffic modelling has confirmed the need for them.</p> <p>An updated viability assessment of the AL13 housing site has been undertaken using the same viability model and approach as that used in the evidence for the Local Plan viability assessments (and found sound by the Local Plan Inspector), but updated for major changes in costs and values and based on the guidance set out in the draft SPD. The assessment indicated that the development is still viable. As such the Council considers that the infrastructure that is needed to support the development is realistic and viable.</p>
7.1.27	<p>The Planning Practice Guidance indicates that it is not appropriate for SPDs to set out new formulaic approaches to SPDs</p>	<p>The Council is providing a simple but comprehensive approach to infrastructure delivery and funding that is its preferred approach to ensure that the comprehensive approach required in policy is achieved. The amounts set out are expressed as a guide, but are included to ensure that development can comply with the policy requirement to deliver comprehensive and coordinated infrastructure provision across the area.</p> <p>Should developers choose not to adopt this approach, the final SPD sets out an alternative more complex approach.</p> <p>Revise SPD to set out an alternative more complex approach to infrastructure funding should developers choose not to adopt the Council’s preferred approach</p>
7.1.27	<p>S106 contributions should be based on a per dwelling approach rather than per sq m approach because the quantum based on sq m is unknown, could vary a lot and hence could lead to funding gaps</p>	<p>Disagree. Because the dwelling type/size is likely to vary considerably across the site given the site proforma and site characteristics, it is considered to be more equitable to base contributions on a per sq m basis. Whilst the precise amount of sq m is not known the same applies if the approach was based on dwelling numbers.</p>

7.1.27	Concern that with a number of different land parcels it is difficult to know when development will be delivered and when infrastructure is required. Recommend preparation of an Infrastructure Delivery Plan setting out the infrastructure required and what is a priority.	Noted. Appendix 2 of the SPD sets out infrastructure requirements for the SW Maidenhead area, although not for any wider impacts. Section 7 provides an indication of priorities in terms of earlier delivery of infrastructure. Further updates will be provided on the Council's website as required. Further information on the need for and timing of school provision is set out in a new Appendix 4
7.1.27	Alternative calculations of s106 contributions for 1 parcel of development provided, including assessment of traffic impact of that development on key junctions, whilst accepting a cost per dwelling for other elements	Approach set out does not adopt a comprehensive approach to provision of infrastructure in SW Maidenhead and mixes and matches different approaches. SPD to set out a preferred simple comprehensive approach and a more complex approach and make clear that it would not be appropriate to mix and match approaches
	Full costs breakdown should be provided for any contributions sought	Costs are set out in Appendix 2 Update costs and costing information in Appendix 2 based on latest information, including indexing to December 2022
7.1.27	A per square metre approach may jeopardise the viability / deliverability of smaller dwellings, particularly apartment schemes in higher density areas.	Disagree. It has the opposite effect. If contributions were charged on a per dwelling basis, then proportionately the costs would be higher for smaller units.
7.2	National Highways observe it will be important that infrastructure improvements are in place as various stages of development open to prevent the unsafe operation of the SRN.	Noted
7.2	Note this has not been included with the Berkeley Homes Spring Hill Development proposals submitted for full planning permission	The timing of infrastructure provision and financial contributions towards infrastructure in relation to the Berkeley scheme are a matter for negotiation as part of the section 106 agreement, should the Council be minded to permit the scheme.
7.3	It is important that each developer will be able to accurately calculate their infrastructure costs and s106/CIL liabilities in order to be included in their viability assessment.	The responses set out above outlines two potentially different approaches to determining developer contributions, including section 106 contributions, with costs and potential levels of contribution provided. They also indicate this information will be

		<p>updated as appropriate on the Council’s website. The assessment of CIL is based on the Council’s charging schedule which is updated annually by the CIL index.</p> <p>As set out in section 7.3, it is important to note that the starting point for considering viability is the viability work undertaken to inform the Local Plan. It is for the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.</p>
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Appendices

Paragraph Number	Summary of Representations	Council Response
Appendix 2	Provides indicative costings of the various infrastructure improvements. Those associated with highways particularly are derived from preliminary design. Given the uncertainty of these it is not justified to rely upon them for determining the extent of contributions.	It is considered that for an SPD these costings are soundly based. The SPD makes clear that these will be kept under review as more information becomes available and in the light of indexing.
Appendix 3	This is partially out of date, both the school and leisure centre have been built for some time. Therefore this section needs to be updated. Whilst supporting better linkages there is a basic concern that AL15 (Braywick Park) should be omitted from the SPD.	Noted. However, Appendix 3 (Appendix 5 in the final version of the SPD) reproduces extracts from the Local Plan so cannot be changed.
Appendix 3	A small concern is if Braywick Park is used to meet bio-diversity targets which could impact on the ability to meet sports targets.	Noted
Appendix 3	Any loss of playing fields must meet requirements of the National Planning Policy Framework paragraphs 98 and 99, this includes new sports facilities.	Noted – the SPD does not propose any loss of playing fields but recognises there may need to be financial contributions to improve playing pitch provision.