

Consultation Statement

Appendix 1 - Summary of Representations on the Building Height and Tall Buildings Supplementary Planning Document

DRAFT

List of those who made representations

Alec Melvin (Dr)	Alison Bowater	Alison Logan
Andrew Hill	Andrew Hockley	Andrew Moran (Councillor)
Ascot, Sunninghill and Sunningdale Neighbourhood Plan Delivery Group	B. Fidler (Mrs)	Beth Osborne
Brian Darracott (Dr)	Caroline and David Fleming	Chloe Browitt
Chris Bailey	Councillor Singh	David Ashwell
David Esling	David Grant	Debbie Ludford
Elizabeth Chan-A-Sue	Eric Boisseau	Fiona Tattersall
Fiona Thornton	Gail Byca	Gavin Pidduck
Gayle Hall	Gerardine Thornton-Taylor	Harriet Fleming
HCUK Group on behalf of UREF LP and Bridgecore Developments Limited	Helen Martin	Hilary Garland
Hurley Parish Council	Ian Haggart	Ian Lester
Iceni Projects on behalf of CALA (Chiltern)	Irene Jordan	Jane Brett
Jean-Marc Herve Maury	Jennifer Griffin	Jill Chadwick
John Smith	John Schonbeck	Jon Davey (Councillor)
Jonathan Reekie	Josephine Crab	Joyce Delasalle
Judith Littlewood	Judy Trinder	Karen Ryder
Katherine Price	Keith Le Page	Luigi Poma
Lynda Jones	Lynn Bradley	Nigel Smith
Maidenhead Civic Society	Maidenhead Great Park Community Interest Company	Mandy Brar (Councillor)
Marika Karavan	Marion Owen	Martin Baker
Martin Ratcliffe	Matthew Woodall	Max Gardiner
Melanie Hill	Mick Jarvis	Mike Potts
Mick Jarvis	Mike Potts	National Highways (Beeta Ginn)
Nexus Planning on behalf of Bray Film Studios Ltd	Owen Mellard	Pamela Knight
Paul Bradley	Paul Martin	Paul Strzelecki (Professor)
Pauline Checkley	Peter Child	Philip Jones

Rachel Cook	Robert Chambers	Robert Luscombe
Roger Davies	Rushington Area Residents Association	Sarah Watford
Savills on behalf of Abri Group Limited	Savills on behalf of Anglesea Capital	Savills on behalf of Taylor Wimpey
Solve Planning on behalf of Shanly Homes Limited	Stephanie Diggon	Stephen Perrett
Sunninghill and Ascot Parish Council	Sue Sewell	Susan Klincewicz
Sylvie Howse	T Mace (Mr)	Tara Crist
Teresa Burton	Thames Water (Mr David Wilson)	The Cookham Society (Tom Denniford)
The Windsor and Eton Society	Theresa Haggart	Theresa May MP
Tom Wright	Troy Planning and Design of behalf of Cookham Parish Council	White Waltham Airfield (Catherine Smith)
Wild Maidenhead	Woolf Bond Planning on behalf of Anita and Siobhan Thomas and McElhinney	

Summary of Representations and Council Response

GENERAL COMMENTS	
Summary of Representation	Council Response
<p>The draft SPD attempts to invent new policy</p>	<p>The SPD provides guidance, it does not allocate sites for development, or encourage the development of tall buildings.</p> <p>The principle of an SPD to support BLP Policy QP3a was established following the adoption of the BLP in 2022.</p> <p>Paragraph 6.14.11 of the BLP states that, the Royal Borough will prepare a Building Height and Tall Buildings SPD. This will identify locations that present opportunities for tall buildings in the Royal Borough, together with site-specific recommendations on building height. It will provide additional detailed guidance on location, height and design of tall buildings and set application requirements for tall buildings. Clause 10 of Policy QP3a also states that further details and guidance on the application of the policy will be set out in a Building Height and Tall Buildings SPD.</p> <p>As explained in paragraph 1.2.1 of the SPD, it supports Local Plan Policy QP3a by setting out in detail what the Council considers to be appropriate in terms of building height in the Royal Borough. The SPD has the following main purposes: To identify what parts of the Royal Borough are inappropriate for tall buildings in principle; To guide the appropriate location and height of tall buildings; To provide clear objectives and design guidance for tall buildings; To highlight the heritage and townscape elements that should be considered in relation to tall building proposals; and to identify areas that can accommodate a general increase in context heights thereby intensifying the urban fabric.</p> <p>The SPD does not create new policy, rather it provides the additional guidance that the Borough Local Plan indicates is necessary.</p>
<p>The draft SPD fails to give sufficient weight to the requirements set out in policy QP3(a) of the BLP / fails to fully take account of this policy</p>	<p>The SPD is clearly based on Policy QP3(a) and follows the principles set out in it.</p>

	<p>Paragraph 1.2.1 states how the SPD supports Local Plan Policy QP3a by setting out in detail what the Council considers to be appropriate in terms of building height in the Royal Borough.</p> <p>Section 1.5 of the SPD goes into detail on the Policy Context including setting out Policy QP3a in full on pages 9 and 10.</p> <p>It is also worth noting, paragraph 1.5.11 of the SPD, which states that Policy QP3a was informed by the Tall Buildings Study and Strategy, which were originally prepared in 2019 and updated in 2021 and 2022. Those documents also informed the SPD itself.</p> <p>As stated in paragraph 6.14.11, the SPD will identify locations that present opportunities for tall buildings in the Royal Borough, together with site-specific recommendations on building height. It will provide additional detailed guidance on location, height and design of tall buildings and set application requirements for tall buildings. Clause 10 of Policy QP3a also states that further details and guidance on the application of the policy will be set out in a Building Height and Tall Buildings SPD. The SPD is considered to fulfil the requirements of the BLP.</p>
<p>It is inappropriate for the SPD to identify sites through an SPD that are not envisaged in the BLP or strategy document supporting the BLP</p>	<p>The principle of an SPD to support BLP Policy QP3a was established following the adoption of the BLP in 2022. Clause 10 of Policy QP3a states that further details and guidance on the application of the policy will be set out in a Building Height and Tall Buildings SPD.</p> <p>The SPD provides guidance, it does not allocate sites for development, nor is it intended to encourage the development of tall buildings. It does identify locations that present opportunities for tall buildings, as required by the Borough Local Plan.</p> <p>The SPD is intended to ensure that any tall building applications that are permitted are of the highest possible quality. The SPD does not permit tall buildings or allocate sites for tall buildings. The intention of the SPD is to give the</p>

	<p>Council more control over what tall buildings are, or are not, permitted within the Borough.</p> <p>The Council has no control over what planning applications are submitted by applicants.</p>
<p>The draft SPD lacks clarity</p>	<p>Noted.</p> <p>It is acknowledged that the SPD is, in places, a technical document. However, it is considered to explain relatively complicated theoretical and practical concepts in as concise and clear a manner as possible.</p> <p>The 10 key principles in Section 4 of the SPD are explained with clarity and each key principle is accompanied by diagrams which help the reader to further understand the urban design concepts and theories underpinning the key principles and the guidance in general.</p> <p>Section 5 of the SPD also provides clear, specific guidance on what may or may not be appropriate in specific locations across the Borough. Section 6 does the same for the sites in Maidenhead Town Centre, with maps and tables clearly stating the findings and recommendations of the SPD.</p> <p>Section 7 of the SPD also provides clear guidance on planning application requirements and the supporting information that planning applications will be expected to include.</p> <p>Overall, the SPD is not considered to lack clarity.</p>
<p>The SPD should make it clear that taller buildings, including local landmarks, are only appropriate in specific locations.</p>	<p>Noted.</p> <p>There is an entire Section of the SPD devoted to identifying the areas that would be inappropriate or sensitive for tall buildings.</p> <p>Section 5.1 of the SPD is entitled ‘Inappropriate And Sensitive Areas’, and paragraph 5.1.1 states:</p>

	<p><i>Based on a thorough assessment of heritage and townscape sensitivities and an understanding of the borough's green belt and flood risk areas, two types of areas have been distinguished:</i></p> <ul style="list-style-type: none"> • <i>Areas that by their nature are inappropriate for tall buildings; and</i> • <i>Areas that are sensitive to tall buildings.</i> <p>In addition, Principle 5.3 on page 46 of the SPD states that development for generally increased context height, large buildings and tall buildings in the Royal Borough of Windsor and Maidenhead should only be promoted on sites indicated in Figures 5.2 -5.7.</p> <p>However, additional wording will be added to the SPD to help make this clearer throughout the document.</p> <p>Amend wording in Section 1 and other relevant locations of the draft SPD to ensure that the SPD is not interpreted to be encouraging the development of tall buildings, but to guide them to the right locations and indicate what might be appropriate in those locations.</p>
<p>The definition of key terms, such as 'context height', are brief and lacking in detail, selective and distributed through the SPD rather than positioned clearly up front</p>	<p>Noted.</p> <p>The SPD gives a clear definition of what is meant by 'context height' in paragraph 2.1.4.</p> <p>This definition is also set out in the Borough Local Plan at paragraph 6.14.2.</p>
<p>The term 'Node' is not defined</p>	<p>Noted.</p> <p>The use of the word 'node' should be taken to mean a central or connecting point in a neighbourhood or area.</p>
<p>The poor quality of the maps and diagrams makes it difficult to for readers to establish exactly the extent of context areas or where the opportunity areas for large or tall buildings are proposed.</p>	<p>Noted.</p> <p>Given the format of the SPD document and the large areas it covers, the SPD only aims to provide an overview of map content and therefore omits map details including street names as this would make diagrams illegible.</p> <p>Amend and update all maps to make more legible. For example, maps 2.1 to 2.6 to include landmarks such as the River Thames.</p>

<p>A preferred approach would be to omit precise locations and limit to exceptional circumstances allowed as grounds for tall and large buildings following the rest of the document's guidance.</p>	<p>The Council is committed to ensuring that any proposed tall buildings are beneficial to the Royal Borough's towns and villages, and that they are in appropriate locations and achieve design excellence. The SPD sets out guidance in line with that required by the Borough Local Plan which states in paragraph 6.14.11, that the SPD will identify locations that present opportunities for tall buildings in the Royal Borough, together with site-specific recommendations on building height. It will provide additional detailed guidance on location, height and design of tall buildings and set application requirements for tall buildings. The SPD is considered to fulfil the requirements of the BLP.</p>
<p>It is completely inappropriate that new sites for Tall Buildings should be introduced through an SPD when they are not envisaged in the BLP or the Strategy document that was written in support of the BLP prior to its Examination.</p> <p>The draft SPD unlawfully expands on newly made policy in the BLP.</p>	<p>The SPD does not expand on Policy QP3a of the BLP.</p> <p>Paragraph 6.14.11 of the Borough Local Plan states that the SPD will identify locations that present opportunities for tall buildings in the Royal Borough, together with site-specific recommendations on building height. It will provide additional detailed guidance on location, height and design of tall buildings and set application requirements for tall buildings. The SPD is considered to fulfil the requirements of the BLP.</p> <p>To be clear, the SPD identifies areas where tall buildings would be inappropriate and, as per paragraph 5.2.1 of the SPD, identifies potential areas where tall buildings may be appropriate. However, the SPD does not allocate sites for development.</p> <p>The SPD provides guidance on appropriate heights, should planning applications come forward for development on those opportunity sites, as required by the BLP.</p> <p>The evidence base for the SPD was part of the Borough Local Plan examination, and therefore examined at that stage by the Inspector. The SPD has responded to the recommendations of the Inspector.</p>

	<p>Amend wording in Section 1 and other relevant locations of the draft SPD to ensure that the SPD is not interpreted to be encouraging the development of tall buildings, but to guide them to the right locations and indicate what might be appropriate in those locations.</p>
<p>BLP Inspector gave very clear identification and expression in her final report of the fundamental principle that should guide the SPD – that in the majority of cases in RWBM there must be truly exceptional reasons for a tall building which exceeds the context height.</p>	<p>Noted.</p> <p>Paragraph 4.10.1 acknowledges that tall buildings are highly visible and, depending on their stature, are a key part of the skyline and image of a place. Therefore they must be of exceptional architectural design and integrity.</p> <p>The BLP Inspector did note that tall buildings should be exceptional. She also noted a range of other considerations (para 132 of the Inspector’s Report) and agreed that an SPD should be produced, “to support the policy by providing further detail on locational opportunities for tall building development, together with any site-specific requirements”. The SPD follows the considerations the Inspector set out and her comments in relation to its content, which also reflect the supporting text policy QP3a.</p> <p>The Royal Borough of Windsor and Maidenhead is committed to ensuring that any proposed tall buildings are beneficial to the Royal Borough’s towns and villages, and that they are in appropriate locations and achieve design excellence.</p>
<p>A fundamental flaw of the SPD is that it only deals with context height and tall buildings. Equally important is the mass of the building and the size of the buildings needed to mitigate the effect of the tallest building. There is no way of knowing if a proposed landmark building of 30m height is 15m wide or 100m wide. It is in some ways more important than height.</p>	<p>This is a height and tall building SPD, so its principal focus is on height. The massing of buildings and specifically tall buildings can have an impact on how the building is perceived and how well it responds to its context. Buildings that are slender and upward-striving generally tend to appear more elegant than buildings of greater mass or with a slab-like appearance. The massing of development will depend on proposed uses and appropriateness will need to be assessed as part of the development management process.</p> <p>Massing is also covered by the Borough Wide Design Guide. Chapter 7 includes a section on Building Scale, Massing and Heights. Paragraph 7.24 includes approaches which may allow larger buildings with large scale and mass to be integrated into fine grain environments in a sensitive and high-quality manner.</p>

	<p>However, Principle 7.6 clearly states that the Council will resist proposals where the bulk, scale and mass adversely impact on the street scene, local character and neighbour amenities.</p> <p>Furthermore, Section 4.10 of the SPD states that any tall buildings should be designed to express elegance, proportionality and verticality in a form that is consistent from every angle. To that end, generally, slab blocks and bulky forms should be avoided.</p> <p>In addition, Section 7.2 of the SPD also states that any planning application will need to include a Design and Access Statement that addresses scale and massing.</p>
<p>There have been many residents commenting on various platforms that they do not want this. All in all this SPD bares absolutely no relation to what is needed and much less to what is good for residents who have to endure architectural monstrosities – it undermines quality of life and wellbeing.</p>	<p>The Council is committed to ensuring that any proposed tall buildings are beneficial to the Royal Borough’s towns and villages, and that they are in appropriate locations and achieve design excellence. The Council considers that it is important to have this SPD to help achieve this, rather than provide no guidance.</p> <p>This SPD is not designed to encourage tall buildings, but rather to allow the Council more control over any planning applications for large or tall buildings that come forward in the future.</p> <p>Inappropriately located, designed or scaled tall buildings can cause significant adverse impacts on their immediate and wider contexts by appearing overly prominent in views, causing harm to heritage assets and their settings, drawing attention away from historic landmarks or skyline features, resulting in overshadowing and overlooking of low-rise housing and gardens, or by being out of place and detracting from the character of towns and villages.</p> <p>The purpose of the SPD is explained in paragraph 1.2.1, which clearly states that the SPD supports Local Plan Policy QP3a. Policy QP3a responds to increasing pressure for higher density and tall development and is intended to ensure that the unique character of the borough’s towns and villages is protected from inappropriately tall development. Furthermore, Section 7 of the SPD contains an</p>

	<p>extensive list of planning application requirements intended to give Officers more information to enable a thorough assessment of the proposals and design.</p>
<p>The SPD has strayed over the boundary from merely identifying locations where an increase in building height could be acceptable in exceptional circumstances, and instead gives the strong impression that tall buildings in these locations are fully acceptable, and the constraints that will affect each and every potential site are downplayed.</p>	<p>Paragraph 6.14.11 of the Borough Local Plan states that the SPD will identify locations that present opportunities for tall buildings in the Royal Borough, together with site-specific recommendations on building height. It will provide additional detailed guidance on location, height and design of tall buildings and set application requirements for tall buildings. The SPD is considered to fulfil the requirements of the BLP.</p> <p>The SPD provides guidance, it does not allocate sites for development. The SPD is not designed to encourage tall buildings, but rather to allow the Council more control over any planning applications for large or tall buildings that come forward in the future. This SPD is intended to give the Council more control over applications for development and introduces more requirements upon developers bringing forward development proposals that include tall buildings.</p> <p>Amend wording in Section 1 and other relevant locations of the draft SPD to emphasise that the SPD is not designed to encourage the development of tall buildings, but to guide them to the right locations and indicate what might be appropriate in those locations.</p>
<p>By proposing tall and larger buildings on sites not identified for redevelopment in the local plan the SPD is effectively amending the local plan and encouraging proposals for larger and taller buildings in these areas.</p>	<p>Paragraph 6.14.11 of the Borough Local Plan states that the SPD will identify locations that present opportunities for tall buildings in the Royal Borough, together with site-specific recommendations on building height. It will provide additional detailed guidance on location, height and design of tall buildings and set application requirements for tall buildings. The SPD is considered to fulfil the requirements of the BLP.</p> <p>The SPD provides guidance, it does not allocate sites for development, or propose any tall or larger buildings on any sites.</p> <p>The SPD is not designed to encourage tall buildings, but rather to allow the Council more control over any planning applications for large or tall buildings</p>

	<p>that come forward in the future. This SPD also introduces more requirements upon developers bringing forward development proposals that include tall buildings.</p> <p>Amend wording in Section 1 and other relevant locations of the draft SPD to ensure that the SPD is not interpreted to be encouraging the development of tall buildings, but to guide them to the right locations and indicate what might be appropriate in those locations.</p>
<p>Objection to building heights – suggest nothing over 5m in Area type A and 7m in Area type B.</p>	<p>The context heights identified in the SPD follow a robust methodology and are considered appropriate.</p> <p>Following public consultation, context heights in the Borough have been reassessed to make use of available digital data (Lidar based DTM and DSM data, and OS data), leading to more accurate results.</p> <p>Paragraph 2.1.6 explains the five common area types identified by the context height analysis. Area Type A is a mix of 1-2 storey buildings with a context height of 5m. Area Type B includes predominantly 2 storey buildings at 7m. These categorisations are based on the above mentioned height mapping methodology and are considered to be a fair and accurate representation of the context heights found within the borough.</p> <p>Amend wording in Section 5 and Section 6 of the draft SPD to ensure that the context heights have been updated in line with the findings of the post-consultation review of context heights.</p>
<p>Insufficient infrastructure to support high density</p>	<p>These is a matter to be assessed in the determination of any planning application that is submitted.</p> <p>However, Principle 4.2 of the SPD is clear that tall buildings in RBWM should have a clear role and purpose to deliver vital social, cultural or civic infrastructure.</p>

	<p>Section 7 of the SPD is also clear that a Physical Impact Assessment should be submitted with any planning application which illustrates the impact on telecommunications and subterranean service infrastructure.</p> <p>Any proposal for a tall building in the Borough would need to take account of all the guidance listed in the draft SPD, as well as the relevant policies in the Borough Local Plan and National guidance.</p> <p>BLP Policy IF1 states that development proposals must, where appropriate, deliver infrastructure to support the overall spatial strategy of the Borough, including making contributions to the delivery of all relevant infrastructure projects included in the IDP in the form of financial contributions or on site provision. In addition, Policy IF4 states that the Council will work in partnership with infrastructure service providers and developers to ensure that the infrastructure needed to support development is provided in a timely manner to meet the needs of the community. In some cases, it will be necessary for the infrastructure to be provided before development commences. Any planning application submitted would need to comply with all relevant policies in the BLP.</p> <p>As part of the development management process, statutory consultees would also be consulted on any relevant development proposals and on the need to deliver improvements in local infrastructure.</p>
<p>The possible opportunities for tall buildings must be balanced by equal emphasis on limits, restrictions and full range of conditions that apply to tall buildings, in order that they are correctly positioned as the 'exception' to the rule, and that controversial and/or inappropriate tall buildings that would change the character of the Borough are actively discouraged</p>	<p>The SPD supports Local Plan Policy QP3a by setting out in detail what the Council considers to be appropriate in terms of building height in the Royal Borough. Policy QP3a responds to increasing pressure for higher density and tall development and is intended to ensure that the unique character of the borough's towns and villages is protected from inappropriately tall development.</p> <p>The SPD has the following main purposes: to identify what parts of the Royal Borough are inappropriate for tall buildings in principle; to guide the appropriate location and height of tall buildings; to provide clear objectives and design guidance for tall buildings; to highlight the heritage and townscape elements that</p>

	<p>should be considered in relation to tall building proposals; and to identify areas that can accommodate a general increase in context heights thereby intensifying the urban fabric.</p> <p>Furthermore, Section 7 of the SPD contains an extensive list of planning application requirements intended to give Officers more information to enable a thorough assessment of the proposals and design.</p>
<p>Some of the key points of Historic England Advice Note 4 have not been included in the SPD</p>	<p>Section 1.5 of the SPD explains the Policy Context and covers the Historic England Advice Note 4 on Tall Buildings. As mentioned in paragraph 1.5.8, the SPD aligns closely to the Historic England advice note to ensure it is based on best practice guidance.</p> <p>The Townscape and Heritage Assessment Criteria column of Table 5.1 in the SPD also clearly states (for multiple relevant locations) that proposals for any taller building should be discussed at the earliest opportunity with RBWM and Historic England.</p> <p>It should also be noted that any proposal for development must comply with Policy HE1 of the BLP which states that the historic environment will be conserved and enhanced in a manner appropriate to its significance.</p>
<p>Any proposed tall buildings must comply with the White Waltham Airfield safeguarding map.</p>	<p>Any proposal for a tall building will need to take account of the policies of the BLP, national policies and the guidance included in the SPD and other relevant documents. The impact of any proposed tall building on the White Waltham Airfield, or vice versa, would need to be fully assessed during the consideration of a planning application.</p>
<p>Several points from the Tall Buildings Strategy update should be included in the SPD relating to context height:</p> <ul style="list-style-type: none"> - A more varied town centre with buildings ranging between 3 and 6 storeys could actually have a context height of 4 storeys, based on a professional assessment. - The importance of understanding context height is that it is a key element in defining the character of a place. 	<p>The context heights identified in the SPD follow a robust methodology and are considered appropriate.</p> <p>Following public consultation, context heights in the Borough have been reassessed to make use of available digital data (Lidar based DTM and DSM data, and OS data), leading to more accurate results.</p>

<ul style="list-style-type: none"> - Context height also has a direct consequence on levels of overshadowing, overlooking and privacy, which affect the quality of residential environments and public spaces. - That high density development can be delivered without high rise buildings (our emphasis). Figure 4.1 in the Tall Buildings Strategy Final Report April 2022 (Update) shows how compact urban blocks of less than 8 storeys can deliver higher residential densities than taller developments of up to 13 storeys. 	<p>The SPD provides guidance, any development proposal which includes a tall building in the Borough will need to take account of all of the guidance listed in the SPD, as well as the relevant local and national planning policies.</p> <p>Ensuring the quality of residential environments and public spaces is crucial for any proposed tall building. The SPD reinforces this, and the issues of overshadowing and privacy are covered by the 10 key principles in Section 4 of the document. Section 7 of the SPD also recommends that any planning application is accompanied by a Physical Impact Assessment which considers the impact of any tall building proposal on privacy and overlooking, overshadowing.</p> <p>Paragraph 6.2.2 of the SPD acknowledges that tall buildings are not the only way of delivering high density. Increasing the context height of a wider area can result in high densities in liveable urban quarters that respect the scale of the historic town centre.</p> <p>In addition, Policy QP3a (9)(g) states that proposals for tall buildings must be of the highest quality of design and demonstrate how they will maintain adequate distance between buildings to protect the amenity of existing and future residents (including consideration of privacy, day and sun-lighting and outlook).</p>
<p>Tall buildings create sun-less wind tunnels, cannot be softened by planting and require resources which are unsustainable.</p>	<p>Any planning application that is submitted must carefully consider all the issues raised. Section 7 of the SPD includes an extensive list of supporting information that will need to be submitted to support applications for tall buildings. This includes a Physical Impact Assessment to illustrate, amongst other things, wind tunnel studies.</p> <p>In addition, Policy QP3a (9)(i) states that proposals for tall buildings must be of the highest quality of design and demonstrate how they will ensure the development does not adversely impact on the microclimate of the application site and the surrounding area.</p>
<p>Tall buildings create dark areas leaving people vulnerable to antisocial behaviour. If you put people in small boxes with no outside space antisocial behaviour increases, and more police presence is required.</p>	<p>Clause 9(h) of the Borough Local Plan Policy QP3a states that proposals for tall buildings must be of the highest quality of design and demonstrate how they will provide high quality private and communal open space, play areas and public realm for occupants of the building.</p>

	<p>Section 4.2, paragraph 4.2.4 of the SPD states that development of a large site can provide opportunities for public open space, with paragraph 4.8.3 of the SPD making clear that the location, height, and design of tall buildings should test and ensure its impact on overshadowing of surrounding open spaces, buildings, private and communal outdoor spaces is minimised. Furthermore, as mentioned in paragraph 4.8.9, proposals for tall residential buildings must demonstrate how they will deliver amenity spaces. These may be in the form of communal courtyards and gardens, private balconies, terraces, or communal rooftop open spaces. Paragraph 4.9.6 of the PSD provides further guidance and states that public open space design should reflect the needs of residents and the wider public and where appropriate provide a setting for the tall building and be orientated to maximise sun exposure. As outlined in paragraph 4.9. of the SPD, overshadowing by a tall building may undermine its attractiveness and should be avoided. Figure 4.12 of the SPD shows how tall buildings should avoid overshadowing open spaces. Proposals must consider the impact of shadow pattern on the amenity and useability of the public space.</p> <p>Section 7 of the SPD includes an extensive list of supporting information that will need to be submitted to support applications for tall buildings. This includes a Design and Access Statement that sets out the architectural and urban design rationale for the proposal and addresses, amongst other factors, the relationship to open space including waterways).</p>
<p>Tall buildings create areas that are constantly full of litter and lacking in natural wildlife.</p>	<p>One of the ten key principles identified to guide the approach and design of tall buildings in the Royal Borough is that tall buildings should be sustainable and innovative developments. Section 4.11 outlines how tall buildings should significantly contribute to green and blue infrastructure provision both within the development as well as the wider area.</p> <p>Section 7 of the SPD includes an extensive list of supporting information that will need to be submitted to support applications for tall buildings. This includes a Sustainability Statement that outlining how the building will apply best sustainable practices, including waste management. Any planning application</p>

	<p>would also require a Building Services Strategy which would include waste storage and disposal and maintenance.</p> <p>Any proposal for a tall building in the Borough would also need to comply with all relevant policies in the Borough Local Plan and National guidance with regards to impact on nature and wildlife.</p>
<p>I am concerned that the tall building study and strategy is based on grade I and II* listed buildings only. The Borough has a great many grade II listed buildings which contribute to the character of the area. Would like to see these included in the analysis to determine whether it would affect any of the conclusions and recommendations.</p>	<p>Grade II listed buildings are included in the analysis. Table 5.1 of Section 5 of the SPD includes The Heritage and Townscape Assessment Criteria column for each of the assessed sites. Grade II listed buildings are mentioned where relevant. For example the assessment of site W8 King Edward Hospital includes the following analysis, <i>'Development to ensure an appropriate and sensitive response, and appear clearly subordinate, to the Grade II Listed King Edward VII Hospital.'</i></p> <p>In addition, Section 6 of the SPD includes a Heritage and Townscape Assessment Criteria for each of the identified locations. These include reference to any Grade II listed buildings in the assessed area. For example, (A) Historic High Street on page 70, stresses the need for testing of the impact of tall buildings on multiple Grade II listed buildings, including the Stable, 25 & 27 Broadway and the Bear Hotel.</p>
<p>There is insufficient parking for high density development.</p>	<p>Section 4.9 of the SPD gives detail regarding parking design. Paragraph 4.9.8 recognises that tall buildings can generate a high demand for parking due to high residential density. Parking provision should be integrated within the building envelop as part of a structured solution and wrapped with other uses to minimise its visual impact on the street scene. Alternatively underground parking could be considered.</p> <p>In addition, Section 7 of the SPD includes an extensive list of supporting information that will need to be submitted to support applications for tall buildings. This includes a Movement Statement that provides a traffic impact assessment, including car parking, pedestrian movement and public transport needs, and a servicing strategy.</p>

	Any proposal for a tall building in the Borough would also need to take account of all relevant policies in the Borough Local Plan and National guidance with regards to parking provision.
The Council should be liable for any poor workmanship as they grant the planning permissions.	This is not a planning consideration. The developer of any scheme is responsible for the quality of their workmanship. The Building Regulations 2010 cover the construction and extension of buildings.
Loss of light resulting from Tall Buildings.	The impact of any development on amenity should be fully assessed. Section 4.8 of the SPD outlines how proposed tall buildings should deliver high quality places to live. For example, as outlined in paragraphs 4.8.5-4.8.7 of the SPD, provide guidance on resident amenity, with paragraph 4.8.6 of the SPD specifically stating that the interior of dwellings should receive adequate daylight and sunlight and comply with BRE's good practice guidance on daylight and sunlight. Figure 4.12 of the SPD also shows how tall buildings should avoid overshadowing open spaces. Proposals must consider the impact of shadow pattern on the amenity and useability of the public space. Clause 9(g) of the Borough Local Plan Policy QP3a states that maintain adequate distance between buildings to protect the amenity of existing and future residents (including consideration of privacy, day and sun-lighting and outlook).
No need for buildings to be over three storeys high outside of the central area.	The context heights identified in the SPD follow a robust methodology and are considered appropriate. Following public consultation, context heights in the Borough have been reassessed to make use of available digital data (Lidar based DTM and DSM data, and OS data), leading to more accurate results. Paragraph 2.1.6 explains the five common area types identified by the context height analysis. Area Type A is a mix of 1-2 storey buildings with a context height of 5m. Area Type B includes predominantly 2 storey buildings at 7m. These categorisations are based on the above mentioned height mapping methodology and are considered to be a fair and accurate representation of the context heights found within the borough.

<p>All tall buildings should have sufficient private and public space, and parking (including electric car charging).</p>	<p>Section 4.9 of the SPD gives detail regarding parking design. Paragraph 4.9.8 recognises that tall buildings can generate a high demand for parking due to high residential density. Parking provision should be integrated within the building envelop as part of a structured solution and wrapped with other uses to minimise its visual impact on the street scene. Alternatively underground parking could be considered.</p> <p>Paragraph 4.11.4 states that Tall building developments should seek to encourage the use of public transport, walking and cycling, support car sharing and minimise parking provision. Electric car charging points should be provided.</p> <p>In addition, Section 7 of the SPD includes an extensive list of supporting information that will need to be submitted to support applications for tall buildings. This includes a Movement Statement that provides a traffic impact assessment, including car parking, pedestrian movement and public transport needs, and a servicing strategy.</p> <p>Any proposal for a tall building in the Borough would also need to comply with all relevant policies in the Borough Local Plan and National guidance with regards to parking provision.</p>
<p>The draft SPD seems an invitation to developers to build high and large.</p>	<p>The principle of an SPD to support the BLP and BLP Policy QP3a was established following the adoption of the BLP in 2022. Clause 10 of Policy QP3a states that further details and guidance on the application of the policy will be set out in a Building Height and Tall Buildings SPD.</p> <p>The SPD provides guidance, it does not allocate sites for development, nor is it intended to encourage the development of tall buildings. It does identify locations that present opportunities for tall buildings, which is what the Borough Local Plan states that it should do.</p> <p>The SPD is intended to ensure that any tall building applications that are permitted are of the highest possible quality. The SPD does not permit tall buildings or allocate sites for tall buildings. The intention of the SPD is to give the</p>

	<p>Council more control over what tall buildings are, or are not, permitted within the Borough.</p> <p>This SPD is intended to give the Council more control over applications for development and introduces more requirements upon developers bringing forward development proposals that include tall buildings.</p> <p>Amend wording in Section 1 and other relevant locations of the draft SPD to ensure that the SPD is not interpreted to be encouraging the development of tall buildings, but to guide them to the right locations and indicate what might be appropriate in those locations.</p>
<p>What weight would local resident’s objections be given if a large building satisfied these guidelines but was seriously opposed by the community.</p>	<p>Any application would be assessed on its own merits and against adopted policies. Resident objections would need to be assessed and considered in the determination of any planning application that is received.</p>
<p>The Environment Agency has designated the Thames Water region to be “seriously water stressed”. Thames Water support the mains water consumption target of 110 litres per head per day (105 litres per head plus a daily allowance of 5 litres per head for gardens) as set out in the NPPG and support the inclusion of this requirement in the policy.</p>	<p>The Council’s Interim Sustainability Position Statement states the following: Development should minimise the use of mains water by:</p> <ul style="list-style-type: none"> a. incorporating water saving measures and equipment b. designing residential development so that mains water consumption would meet a target of 105 litres or less per head per day (excluding an allowance of 5 litres or less per head per day for external water consumption.) <p>Paragraph 14.16.9 of the BLP states that to ensure that sufficient water supplies, and sewerage infrastructure are available to service any new developments, it will be necessary to examine existing provision and the impact that a development proposal is likely to have on capacity and water pressure.</p> <p>Clause 6 of Policy IF7 of the BLP states that new water resource schemes, improvements to the water supply network, demand management measures needed to meet current and future water supply needs and those needed to meet the challenges of climate change and environmental protection will be supported.</p>

<p>Thames Water consider that the SPD should include a specific reference to the key issue of the provision of wastewater/sewerage and water supply infrastructure to service development proposed in a policy. Proposed new water / wastewater infrastructure text to be included in the SPD.</p>	<p>Policy IF7 of the BLP covers water supply and sewerage infrastructure. states that new water resource schemes, improvements to the water supply network, demand management measures needed to meet current and future water supply needs and those needed to meet the challenges of climate change and environmental protection will be supported.</p> <p>Any proposal for a tall building in the Borough would also need to comply with all relevant policies in the Borough Local Plan and National guidance with regards to water provision and sewerage infrastructure.</p> <p>Where relevant, Thames Water, are consulted on planning applications as the statutory sewerage undertaker for the whole Borough and the statutory water undertaker for part of the Borough.</p>
<p>Building upwards in densely populated areas would result in overlooking of gardens and lower floors.</p>	<p>The SPD provides guidance, any development proposal which includes a tall building in the Borough will need to take account of all of the guidance listed in the SPD, as well as the relevant local and national planning policies. Ensuring the quality of residential environments and public spaces is crucial for any proposed tall building. The SPD reinforces this, and the issues of overshadowing and privacy are covered by the 10 key principles in Section 4 of the document. Section 7 of the SPD also recommends that any planning application is accompanied by a Physical Impact Assessment which considers the impact of any tall building proposal on privacy and overlooking, overshadowing.</p> <p>In addition, Policy QP3a (9)(g) states that proposals for tall buildings must be of the highest quality of design and demonstrate how they will maintain adequate distance between buildings to protect the amenity of existing and future residents (including consideration of privacy, day and sun-lighting and outlook).</p>
<p>Urge the Council to produce a comprehensive list of non-designated heritage assets as soon as possible to assess heritage sensitivities in relation to tall buildings.</p>	<p>It would not be appropriate for this SPD to produce a comprehensive list of non-designated heritage assets.</p>

<p>It would be helpful for the reader to put metre values in perspective (i.e. a 10-metre-high building would typically contain 3 residential storeys, however, the exact height of a storey will vary from building to building)</p>	<p>Paragraph 2.1.8 of the SPD states the following: Note that when the term “storeys” is used, it is referring to a generic residential storey of 3.2m in height. The term is used for the benefit of the reader to put metre values in perspective. For instance a 10m building would typically contain 3 residential storeys. In reality, the exact height of a storey will vary from building to building and will typically be higher than 3.2m in commercial buildings.</p>
<p>Higher densities do not have to come in the shape of tall buildings. There is no evidence that shows building heights per se affects regeneration. Royal Borough of Kensington and Chelsea: "confidence in regeneration is signalled through quality urban design and public realm improvement rather than tall buildings". There is some evidence that social regeneration in terms of the vibrancy of an area and social communication can be impeded by tall buildings</p>	<p>This SPD does not claim that higher densities can only be delivered in the shape of tall buildings. Rather, the SPD is intended to ensure that if any proposals for tall buildings are submitted to the Council, they must be beneficial to the Boroughs towns and villages, be of the highest quality and be in the most appropriate locations.</p> <p>Paragraph 4.2.2 states that speculative proposals for tall buildings on smaller sites that do not fit in with an agreed wider vision for a place can lead to a fragmented townscape, an illegible skyline, weaken the distinctiveness and image of place, and undermine regeneration.</p> <p>Therefore, as per paragraph 4.2.1 of the SPD, tall buildings should only be considered where they are part of a plan-led strategy for change and regeneration led by a comprehensive and widely supported vision, and where it has a clear purpose in delivering this vision.</p> <p>In addition, policy QP3a of the BLP states that to be acceptable, tall building proposals will need to be part of a comprehensive approach to development and placemaking. Proposals should demonstrate how as a landmark building (or cumulatively as part of a cluster of buildings) they will significantly enhance legibility and deliver significant regeneration benefits for the locality.</p>
<p>How will costs of management and maintenance be apportioned between the Borough, developers, and residents through their service charges.</p>	<p>This is a matter for the different parties involved to determine. This does not fall within the scope of this SPD.</p>

<p>Tall Buildings as Landmarks - who will decide what is good design, what "teeth" will the local authority have for rejecting what it considers to be detrimental design.</p> <p>Design factors specific to tall buildings - main challenges are overlooking, reduced daylight and sunlight; in single aspect blocks there can be overheating due to sun exposure and lack of through ventilation; access for emergency services; microclimate impacts (wind, overshadowing, light and glare) which affect the public realm</p>	<p>The Borough Local Plan includes policy QP3a – ‘Building Height and Tall Buildings’ which addresses the height of all new development, with specific urban design criteria for tall buildings. Clauses 5-9 of policy QP3a list those criteria. The purpose of the SPD is to expand upon that by providing further details and guidance on the application of the policy.</p> <p>Section 4 of the SPD includes the ten key principles that have been identified to guide the approach and design of any proposed tall buildings in the Borough.</p> <p>Section 7 of the SPD sets out the specific requirements for developers intending to submit a planning application for a tall building. Design factors specific to tall buildings will be assessed against the guidance in the SPD, the policies within the BLP and national guidance when the Council receives a planning application which includes a tall building.</p>
<p>Tall buildings are more expensive to build than lower rise / conventional buildings which means costs passed on to the end-user or quality scaled down; also more expensive ongoing maintenance costs which can result in poor maintenance.</p>	<p>Noted.</p> <p>This doesn’t take away the need to secure high quality, well designed developments.</p> <p>Section 7 of the SPD also recommends that any planning application is accompanied by evidence to demonstrate that the viability and appropriateness of other (lower rise) forms of high density development have been explored.</p> <p>Maintenance costs are beyond the scope of this SPD.</p>
<p>Tall Buildings carry a greater environmental cost.</p> <p>In this era of climate emergency, we should be protecting the environment. Living in tall buildings and destroying the environment is letting down the future generation.</p>	<p>One of the key principles in Section 4 is that tall buildings should be designed to minimise emissions, adapt to climate change and incorporate blue and green infrastructure.</p> <p>Section 7 of the SPD states that planning applications for tall buildings would need to include a Sustainability Statement that outlining how the building will apply best sustainable practices.</p> <p>Section 4.11 of the SPD outlines how proposed tall buildings should be sustainable and innovative developments. Paragraph 4.11.1 of the SPD states</p>

	<p>that the construction and operation of any tall buildings must be designed to high sustainability standards to minimise their impact on the environment. Tall buildings must respond to the climate emergency by ensuring they are designed to adapt to and mitigate climate change.</p> <p>Any proposal for a tall building in the Borough would need to comply with Policy EP1, and also need to take account of all of the guidance listed in the draft SPD, as well as other relevant policies in the Borough Local Plan and National guidance with regards to impact on the environment.</p>
<p>Had enough of consultations, what's the point of responding. Approving / building more tall buildings will be devastating and a terrible legacy for the future generations. Think outside the box and then let's talk.</p>	<p>The consultation on the SPD was intended to allow residents and stakeholders to have their say on the content of the SPD. The SPD is intended to ensure that we secure high-quality, well-designed buildings and environments.</p> <p>The SPD has been amended in response to comments received during the consultation, including to emphasise that it is not designed to encourage tall buildings.</p>
<p>Difficult to respond to this SPD in a meaningful way because it is simply reflecting and to some extent legitimising the decisions which have already been made.</p>	<p>This is not the case, the consultation on the SPD was intended to allow residents and stakeholders to have their say on the content of the SPD.</p> <p>The SPD has been amended in response to comments received during the consultation, including to emphasise that it is not designed to encourage tall buildings.</p>
<p>Object to the way the consultation has occurred. A 25-storey block of flats has already been passed and signed off by the Council. It was agreed without consultation and will be situated near to the heritage site of Maidenhead football club.</p>	<p>Planning permission for the mentioned scheme was granted before the consultation on this SPD could take place. At the point in time that the consent was granted Council officers could only afford the SPD limited weight in their decision-making process.</p>
<p>No faith in the Council, the planning process nor this consultation</p>	<p>The consultation on the SPD was intended to allow residents and stakeholders to have their say on the content of the SPD. The SPD is intended to ensure that we secure high-quality, well-designed buildings and environments.</p> <p>The SPD has been amended in response to comments received during the consultation.</p>

<p>Why not build houses instead of tall buildings?</p>	<p>The BLP aims to provide new homes that contribute to meeting the needs of the current and projected households within the Borough. The BLP aims to deliver a wide variety of high-quality homes that will provide the tenures, types and sizes of housing to meet the needs and demands of different people in the community. Included within that mix are both flatted developments (potentially in tall buildings) and houses.</p>
<p>Large buildings are subject to a lower level of scrutiny than tall buildings.</p>	<p>As defined in Section 3 of the SPD, large buildings are smaller than tall buildings. As such, and as per paragraph 3.2.13 of the SPD, large buildings usually require less stringent testing compared to tall buildings but should still be carefully located and designed.</p> <p>However, as per clause 5 of paragraph 5.2.10 of the SPD, proposals for large buildings to comply with all relevant design and development management policies and undertake townscape, heritage, visual and landscape impact testing as required.</p> <p>Any proposal for a large building in the Borough would need to take account of all of the relevant guidance listed in the SPD, as well as the relevant policies in the Borough Local Plan, associated guidance in the Council's Borough Wide Design Guide and relevant national policies and guidance.</p>
<p>The SPD does not address how it fits in with permitted development rights to increase building heights. When a 4-storey building is acceptable in an area with a contextual height of 2 storeys a further storey could be added later, making it 5 storeys. This would be unacceptable.</p>	<p>Permitted development rights allow certain types of development without the need to apply for planning permission.</p> <p>They derive from a general planning permission granted not by the local authority but by Government legislation. Currently, this permitted development right does not apply to buildings constructed after October 2018.</p>
<p>Ascot</p>	
<p>The RBWM Townscape Assessment identifies Ascot as a Victorian Village and not an urban conurbation. This must be corrected.</p>	<p>The RBWM Townscape Assessment does not include 'Urban Conurbation' as a 'Townscape Type'. The SPD uses its own terms of reference. The description of Ascot as an 'urban conurbation' has no bearing on the assessment of current context heights or potential future context heights.</p>

	<p>However, in order to avoid confusion, the text of the SPD has been amended to remove the word ‘conurbation’.</p>
<p>The document deviates from the BLP with regard to Ascot – AL16 and QP1c</p>	<p>Table 5.1 of the SPD states clearly that at Ascot Centre (A2), the maximum building height should be 4 storeys.</p> <p>However, text has been amended for A2 in Table 5.1 to state that there is no opportunity for a tall building as per the existing context heights in the area. Context heights in the Borough were reprocessed using a data-based method following the public consultation on the SPD.</p>
<p>Object to the proposals to build high rise buildings in and around Sunningdale station. The area includes Broomhill Farm and a neighbouring field that provides much needed green space for the village and is within the green belt. Sunningdale does not have good transport links neither does it have capacity in its local primary school, doctors and nhs dentist.</p>	<p>The context heights identified in the SPD follow a robust methodology and are considered appropriate.</p> <p>Following public consultation, context heights in the Borough have been reassessed to make use of available digital data (Lidar based DTM and DSM data, and OS data), leading to more accurate results.</p> <p>The assessment of Sunningdale Station Node (SD2 in Table 5.1 of the SPD) amended to state that there is no opportunity for a tall building on this site.</p>
<p>The SPD offers little protection from larger and tall buildings across the Sunninghill and Ascot Parish, which is a green and leafy area of predominantly low-rise domestic scale buildings with a context height of 2 storeys. Full protection is only afforded to the green belt and highly sensitive heritage areas.</p>	<p>The context heights identified in the SPD follow a robust methodology and are considered appropriate.</p> <p>Following public consultation, context heights in the Borough have been reassessed to make use of available digital data (Lidar based DTM and DSM data, and OS data), leading to more accurate results.</p> <p>Amend wording in Section 1 and other relevant locations of the draft SPD to ensure that the SPD is not interpreted to be encouraging the development of tall buildings, but to guide them to the right locations and indicate what might be appropriate in those locations.</p>

<p>The weak protection, together with the sites identified as suitable for tall building(s) that aren't allocated for development in the local plan, will encourage proposals for larger and tall buildings in inappropriate areas around the Parish that will be difficult to prevent.</p>	<p>The principle of an SPD to support the BLP and BLP Policy QP3a was established following the adoption of the BLP in 2022. Clause 10 of Policy QP3a also states that further details and guidance on the application of the policy will be set out in a Building Height and Tall Buildings SPD.</p> <p>Paragraph 6.14.11 of the Borough Local Plan states that the SPD will identify locations that present opportunities for tall buildings in the Royal Borough, together with site-specific recommendations on building height. It will provide additional detailed guidance on location, height and design of tall buildings and set application requirements for tall buildings. The SPD is considered to fulfil the requirements of the BLP.</p> <p>The SPD is intended to ensure that any tall building applications that are permitted are of the highest possible quality. The SPD does not permit tall buildings or allocate sites for tall buildings. The intention of the SPD is to give the Council more control over what tall buildings are, or are not, permitted within the Borough.</p> <p>Amend wording in Section 1 and other relevant locations of the draft SPD to ensure that the SPD is not interpreted to be encouraging the development of tall buildings, but to guide them to the right locations and indicate what might be appropriate in those locations.</p>
<p>The SPD does not afford the same protection to the 4 Victorian villages (of Ascot, North Ascot, South Ascot and Sunninghill) as the Technical and Baseline Study. Particularly concerned that the SPD doesn't afford the same protection as recommended for Sunninghill High Street in the RBWM Tall Building and Baseline Study, or heritage assets listed in the Neighbourhood Plan (Policy NP/DG4 – Heritage Assets).</p>	<p>The Sunninghill High Street area had been identified as sensitive townscape area in the baseline study. This had erroneously been omitted in Diagram 5.1 of the SPD.</p> <p>Amend Diagram 5.1 in the SPD to include sensitive areas. The site has not been identified as having an opportunity for a tall or large buildings in Section 5.</p>
<p>There is no indication as to how the Townscape Character areas listed as sensitive were selected. Most of the Townscape character areas in our parish are 'sensitive' due to their domestic scale, and poor public transport services and highway infrastructure. Larger and tall buildings</p>	<p>Paragraph 5.1.2 of the SPD refers to the Tall Building Study - Technical Baseline, which includes detail on how sensitivities have been established.</p>

<p>and changes to the context height should not be considered in our Victorian Villages and, elsewhere in our parish, only allowed in exceptional circumstances with appropriate mitigation.</p>	<p>Amend Principle 5.2 in the SPD to reflect guidance contained in paragraph 5.1.9 which limits tall buildings in sensitive areas to those identified by the study.</p>
<p>The SPD headings of all the maps wrongly define the whole of the Neighbourhood Plan areas as ‘Ascot’.</p>	<p>Although Figures 2.4 and 5.5 refer to “Ascot” only in their titles, the maps themselves refer to both Ascot and Sunningdale.</p>
<p>The A4 Ascot Station Node is split in two and Table 5.1 identifies it as a possible location for a single tall building. To locate a single tall building on either part of the site would be contrary to Principles 4.1 and 4.2. The two parts of the site do not form a cohesive whole and aren’t part of a wider vision for the area as presented in QP1c of the Local Plan. The southern site is speculative and is not listed as a site for development in the BLP and should be removed from the SPD.</p>	<p>The SPD does not permit tall buildings or allocate sites for tall buildings. The intention of the SPD is to give the Council more control over what tall buildings are, or are not, permitted within the Borough.</p> <p>The A4 site is not split in two in the SPD. Any proposed tall building located on the Ascot Station site (A4 in Table 5.1 of the SPD) would need to take into account all 10 of the key principles included in the SPD.</p> <p>It is worth noting that the northern part of the A4 area (north of the railway line) corresponds to AL18 in the BLP. The proforma in the BLP for this site establishes the principle of a decked car park. This would increase the context height on site.</p>
<p>Suggest a larger area of Sunninghill and Ascot Parish is identified in the SPD as inappropriate for large and tall buildings and included in Figure 5.1: Inappropriate and sensitive areas, due to poor accessibility and limited public transport.</p>	<p>Paragraph 2.1.4 explains that the SPD has mapped the prevailing broad context height of the Royal Borough using the latest available datasets, which is represented in Figures 2.1-2.6 of the document.</p> <p>Section 5 of the SPD also provides clear, specific guidance on what may or may not be appropriate in specific locations across the Borough, including in Ascot and Sunningdale. Section 6 does the same for the sites in Maidenhead Town Centre, with maps and tables clearly stating the findings and recommendations of the SPD.</p> <p>However, the SPD only provides guidance on proposed tall buildings, it does not allocate sites for development, nor is it intended to encourage the development of tall buildings. Any proposal for a tall building will need to take account of the policies of the BLP, national policies and the guidance included in the SPD and other relevant documents.</p>
<p>Cookham</p>	

<p>Proposals for taller buildings in Cookham would significantly undermine the special qualities of the place (as reflected in the Cookham VDS)</p>	<p>Section 5 of the SPD notes that Cookham Village conservation area is highly sensitive and inappropriate for tall buildings.</p> <p>Table 5.1 of the SPD also makes it clear that there is no opportunity for a tall building on any of the Cookham sites assessed in the SPD.</p> <p>Any proposal for development will need to take account of the policies of the BLP, national policies and the guidance included in the SPD and other relevant documents. Any planning application received in Cookham would also need to take account the Cookham Village Design Statement.</p>
<p>4 storey buildings in Cookham would be contrary to section 6.4 of the Cookham VDS</p>	<p>The SPD clearly states that the maximum height of any large building in Cookham (C1 and M1 in Table 5.1) should be a maximum of 3 storeys.</p> <p>Amend text in Table 5.1 to clarify that there is no opportunity for a tall building on any of the sites in Cookham.</p>
<p>Cookham is an area with extensive heritage assets, but which is not recognised / referenced / considered in the SPD.</p>	<p>Protecting and enhancing the Borough’s heritage assets, protected landscapes and their settings is one of the key principles within the SPD.</p> <p>Any proposal for development must comply with Policy HE1 of the BLP which states that the historic environment will be conserved and enhanced in a manner appropriate to its significance.</p> <p>All proposed development proposals need to take account of the policies of the BLP, national policies and be informed by the guidance included in the SPD and other relevant documents including the Borough Wide Design Guide.</p>
<p>Please do not allow the construction of ANY tall buildings of three storeys or more at either Cookham Station or Lower Mount Farm, or in Cookham at all.</p>	<p>Table 5.1 of the SPD makes it clear that there is no opportunity for a tall building on any of the Cookham sites assessed in the SPD. The SPD clearly states that the maximum height of any large building in Cookham (C1 and C2 in Table 5.1) should be a maximum of 3 storeys.</p> <p>Amend text in Table 5.1 to clarify that there is no opportunity for a tall building on any of the sites in Cookham.</p>

	<p>Any proposal for development will need to take account of the policies of the BLP, national policies and the guidance included in the SPD and other relevant documents. Any planning application received in Cookham would also need to take account the Cookham Village Design Statement.</p>
<p>The recommendations in the SPD should be revisited, extending the definition of inappropriate and sensitive areas to include the entirety of Cookham Parish.</p>	<p>Following public consultation, context heights in the Borough have been reassessed to make use of available digital data (Lidar based DTM and DSM data, and OS data), leading to more accurate results.</p> <p>Paragraph 2.1.6 explains the five common area types identified by the context height analysis. Area Type A is a mix of 1-2 storey buildings with a context height of 5m. Area Type B includes predominantly 2 storey buildings at 7m. These categorisations are based on the above mentioned height mapping methodology and are considered to be a fair and accurate representation of the context heights found within the borough.</p> <p>The SPD clearly states that the maximum height of any large building in Cookham (C1 and C2 in Table 5.1) should be a maximum of 3 storeys.</p> <p>Amend text in Table 5.1 to clarify that there is no opportunity for a tall building on any of the sites in Cookham.</p> <p>Any proposal for development will need to take account of the policies of the BLP, national policies and the guidance included in the SPD and other relevant documents. Any planning application received in Cookham would also need to take account the Cookham Village Design Statement.</p>
<p>The extent of the Cookham High Street Conservation Area in the SPD and supporting documents is incorrect as based on pre-September 2022 information. CA extended and renamed as of 29th September 2022.</p>	<p>Noted.</p> <p>Amend Section 5 and Maps where appropriate.</p>
<p>The establishment of 'future context heights' is not justified and could lead to schemes for much taller buildings in Cookham and should be removed from the SPD.</p>	<p>Paragraph 2.1.4 explains that the SPD has mapped the prevailing broad context height of the Royal Borough using the latest available datasets, which is represented in Figures 2.1-2.6 of the document.</p>

	<p>Section 5 of the SPD also provides clear, specific guidance on what may or may not be appropriate in specific locations across the Borough, including Cookham.</p> <p>The SPD clearly states that the maximum height of any large building in Cookham (C1 and C2 in Table 5.1) should be a maximum of 3 storeys.</p> <p>Amend text in Table 5.1 to clarify that there is no opportunity for a tall building on any of the sites in Cookham.</p> <p>Any proposal for development will need to take account of the policies of the BLP, national policies and the guidance included in the SPD and other relevant documents. Any planning application received in Cookham would also need to take account the Cookham Village Design Statement.</p>
<p>Re: the railway station and Local Centre (Cookham Rise) - The strategy said no potential for anything in the local area as it would “overwhelm the existing context”. This statement is removed in the SPD, there is no explanation for this.</p> <p>The station marks the local centre and does not require any tall building to mask its low-profile presence or somehow “mark” it. Refute the need for tall buildings in this area and suggest it should be removed from the SPD.</p>	<p>Following public consultation, context heights in the Borough have been reassessed to make use of available digital data (Lidar based DTM and DSM data, and OS data), leading to more accurate results.</p> <p>Amend Table 5.1 (C1) in the SPD to state that there is no opportunity for a tall building as this would overwhelm existing context.</p> <p>However, there may be potential for a building with a maximum of 3 storeys to mark the rail station, subject to responding sensitively to existing townscape and heritage assets. As a mixed-use building this should contribute to local activities and reinforce the station node.</p>
<p>AL37 (Land north of Lower Mount Farm) – The potential identified in the SPD and strategy for a context height of three storeys and the potential larger building at the entrance to “emphasise” the site is contrary to the stakeholder sessions for this allocated site. The anomaly in the SPD should be removed. The site is open-field (ex-greenbelt) unbuilt on at present.</p>	<p>The adopted Stakeholder Masterplan Document for this site clearly states that a 3 storey building would be out of character.</p> <p>The SPD is intended to provide guidance, it does not allocate sites for development, or encourage the development of large or tall buildings. Any proposal for development on this site will need to comply with the policies in the</p>

	<p>BLP, national policies and take account of the guidance included in the SPD and other relevant documents (including the adopted stakeholder masterplan document). Any planning application received in Cookham would also need to take account the Cookham Village Design Statement.</p> <p>Amend Table 5.1 (C2) in the SPD to state that there is no opportunity for a large or tall building at the AL37 site.</p>
<p>The existing 1-2 storey building height in Cookham is underpinned by significant work by The Cookham Society in maintaining quality spaces for residents and to prevent overdevelopment and unsightly buildings. A 3+ storey building at the station is not in keeping with any of its surroundings, and I am not sure of the purpose of a tall building in this village location. The streets are narrow, there are no additional parking spaces for a large building.</p>	<p>Following public consultation, context heights in the Borough have been reassessed to make use of available digital data (Lidar based DTM and DSM data, and OS data), leading to more accurate results.</p> <p>Amend Table 5.1 (C1) in the SPD to state that there is no opportunity for a tall building at the AL37 site as this would overwhelm existing context.</p> <p>However, there may be potential for a building with a maximum of 3 storeys to mark the rail station, subject to responding sensitively to existing townscape and heritage assets. As a mixed-use building this should contribute to local activities and reinforce the station node.</p>
<p>C2 does not have high public transport accessibility, it does not have a mixed use and it does not have an emerging urban character. It therefore does not comply with QP3a Clause 7.</p>	<p>Following public consultation, context heights in the Borough have been reassessed to make use of available digital data (Lidar based DTM and DSM data, and OS data), leading to more accurate results.</p> <p>Amend Table 5.1 (C2) in the SPD to state that there is no opportunity for a large or tall building at the AL37 site.</p>
<p>Lower Mount Farm is on a hill and given the topography a tall building in this location would dominate.</p>	<p>Figure 4.7 of the SPD notes clearly that topography and additional height needs to be taken into account when designing for tall buildings on elevated land.</p> <p>Following public consultation, context heights in the Borough have been reassessed to make use of available digital data (Lidar based DTM and DSM data, and OS data), leading to more accurate results.</p> <p>Amend Table 5.1 (C2) in the SPD to state that there is no opportunity for a large or tall building at the AL37 site.</p>
<p>No building should be taller than existing heritage such as church spires and historic buildings.</p>	<p>Noted.</p>

	As stated in paragraph 4.7.4 of the SPD, tall buildings should avoid any harmful impact onto townscape or skyline views, and avoid detracting from valued townscape ensembles, landmarks or distinctive skyline features.
Maidenhead	
The number of documents and the number of different consultations, particularly relevant to the 'over' development of Maidenhead is very taxing on hard working residents. The expectation that this level of public engagement is going to be informative and effective is inappropriate and unrealistic.	<p>Noted.</p> <p>The consultation on the SPD was intended to allow residents and stakeholders to have their say on the content of the SPD. The SPD is intended to ensure that we secure high-quality, well-designed buildings and environments.</p> <p>The SPD has been amended in various ways in response to comments received during the consultation.</p> <p>For example, following public consultation, context heights in the Borough have been reassessed to make use of available digital data (Lidar based DTM and DSM data, and OS data), leading to more accurate results.</p>
Further tall buildings, i.e. higher than Berkshire House, are out of character in Maidenhead	<p>Section 6 of the SPD includes a detailed assessment of the different character areas within Maidenhead town centre.</p> <p>Principle 6.1 of the SPD provides a breakdown of the character areas that have been identified as being able to potentially accommodate increased context heights. However, Principle 6.1 also makes it very clear that any proposed development would need to respond appropriately to the site context, townscape features, listed buildings, conservation areas and lower rise residential buildings, and where necessary step down in height.</p> <p>Any proposal for a tall building will need to take account of the policies of the BLP, national policies and the guidance included in the SPD and other relevant documents. This would be assessed during the consideration of a planning application.</p>
The 1.5x ratio is the maximum principle which should be adopted for the Landing and Nicholson's.	Following public consultation, context heights in the Borough have been reassessed to make use of available digital data (Lidar based DTM and DSM data, and OS data), leading to more accurate results.

	<p>It should be noted that planning permissions were granted on the Landings and Nicholson’s sites prior to the consultation on the draft SPD.</p> <p>However, in response to the large number of comments received relating to Section 6 of the SPD and Maidenhead, additional View Impact Testing analysis was carried out following the consultation on specific sites within the town centre. The assessment utilises view testing to assess the potential appropriateness of heights at the two sites in respect of their impact on visual and townscape aspects. It should be noted that it does not take full account of other aspects such as heritage impacts, planning considerations, placemaking, viability or deliverability. These will need to be considered as part of the detailed appraisals required as part of a planning application on these sites.</p> <p>The testing of the impact of height scenarios on the Nicholson Site (Appendix A, Height Testing on key sites in Maidenhead Town Centre) concluded that a building above 16 storeys on this site would be considered out of scale and have a detrimental impact on Maidenhead’s townscape and heritage context. It is acknowledged that a planning permission is granted on the Nicholson Site for 25 storeys, that could lawfully be implemented. However, any new planning application for the Nicholson site would need to be in accord with this updated guidance.</p> <p>The SPD only provides guidance on proposed tall buildings, it does not allocate sites for development, nor is it intended to encourage the development of tall buildings. Any proposal for a tall building will need to take account of the policies of the BLP, national policies and the guidance included in the SPD and other relevant documents. This would be assessed during the consideration of a planning application.</p> <p>Amend text in Section 6 to clarify guidance on the town centre core.</p>
<p>Object to any further high-rise buildings in Maidenhead. The Council are totally oblivious to the state that they are turning this town in to.</p>	<p>Principle 4.2 of the SPD is clear that tall buildings in RBWM should have a clear role and purpose to deliver vital social, cultural or civic infrastructure.</p>

<p>We are short of infrastructure (including doctor's surgeries and schools etc) in addition to eyesore properties.</p>	<p>Section 7 of the SPD is also clear that a Physical Impact Assessment should be submitted with any planning application which illustrates the impact on telecommunications and subterranean service infrastructure.</p> <p>Any proposal for a tall building in the Borough would need to take account of all the guidance listed in the draft SPD, as well as the relevant policies in the Borough Local Plan and National guidance.</p> <p>BLP Policy IF1 states that development proposals must, where appropriate, deliver infrastructure to support the overall spatial strategy of the Borough, including making contributions to the delivery of all relevant infrastructure projects included in the IDP in the form of financial contributions or on site provision. In addition, Policy IF4 states that the Council will work in partnership with infrastructure service providers and developers to ensure that the infrastructure needed to support development is provided in a timely manner to meet the needs of the community. In some cases, it will be necessary for the infrastructure to be provided before development commences. Any planning application submitted would need to comply with all relevant policies in the BLP.</p> <p>As part of the development management process, statutory consultees would also be consulted on any relevant development proposals and on the need to deliver improvements in local infrastructure.</p> <p>These are matters for consideration in any planning application that may be submitted.</p>
<p>Against the Tall Building strategy having seen the current building work underway which has changed the whole town environment for the worse. It will result in unsightly tower blocks that will not attract young professionals from London and will become dark and unattractive places prone to low level crime. Lack of greenery is also a concern.</p>	<p>The BLP aims to provide new homes that contribute to meeting the needs of the current and projected households within the Borough. The BLP aims to deliver a wide variety of high-quality homes that will provide the tenures, types and sizes of housing to meet the needs and demands of different people in the community. Included within that mix are both flatted developments (potentially in tall buildings) and houses.</p>

	<p>Section 7 of the SPD states that planning applications for tall buildings would need to include a Sustainability Statement that outlining how the building will apply best sustainable practices. Section 4.11 of the SPD outlines how proposed tall buildings should be sustainable and innovative developments. Paragraph 4.11.1 of the SPD states that the construction and operation of any tall buildings must be designed to high sustainability standards to minimise their impact on the environment. Tall buildings must respond to the climate emergency by ensuring they are designed to adapt to and mitigate climate change.</p> <p>Clause 1 of Policy EP1 of the BLP also states that Development proposals will only be supported where it can be shown that either individually or cumulatively in combination with other schemes, they do not have an unacceptable effect on environmental quality or landscape, both during the construction phase or when completed.</p> <p>Any proposal for a tall building in the Borough would need to comply with Policy EP1, and also need to take account of all of the guidance listed in the draft SPD, as well as other relevant policies in the Borough Local Plan and National guidance with regards to impact on the environment.</p>
<p>Why is so much housing expected in Maidenhead? It is not creating and positive and vibrant future for the town. The density causes issues for cars and parking and services that won't keep pace. Should focus on housing with greenery, not high-rise flats</p>	<p>The BLP aims to provide new homes that contribute to meeting the needs of the current and projected households within the Borough. The BLP aims to deliver a wide variety of high-quality homes that will provide the tenures, types and sizes of housing to meet the needs and demands of different people in the community. Included within that mix are both flatted developments (potentially in tall buildings) and houses.</p> <p>Paragraph 6.4.2 of the BLP states that Maidenhead has been identified as the key focus in the Borough for accommodating future development and the town centre area will play a major role in delivering the scale and mix of development types that the Borough requires. 12 of the Plan's 40 allocated development sites lie in the town centre area delivering retail, employment, housing, leisure and community uses. The range of uses, scale of development, intensity of activity and large number of different sites makes it important that the future</p>

	<p>development of the town centre is considered holistically and compels the need for a bold vision of placemaking.</p> <p>As explained in paragraph 5.1.1 of the SPD, a thorough assessment of the heritage and townscape sensitivities and an understanding of the borough's green belt and flood risk areas has identified areas that could be appropriate for tall buildings and areas that are sensitive to tall buildings. As explained in paragraph 5.2.7 Maidenhead town centre offers an opportunity for tall buildings in several of its character areas and therefore has been looked at in detail in Chapter 6 of the SPD.</p> <p>However, the SPD provides guidance, it does not allocate sites for development, nor is it intended to encourage the development of tall buildings. It does identify locations that present opportunities for tall buildings, which is what the Borough Local Plan states that it should do.</p>
<p>Maidenhead Town Centre is crowded with tall buildings that block out the light and overshadow the sky. It is claustrophobic. Town planners have no vision or imagination.</p>	<p>Ensuring the quality of residential environments and public spaces is crucial for any proposed tall building. The SPD reinforces this, and the issues of overshadowing and privacy are covered by the 10 key principles in Section 4 of the document. Section 7 of the SPD also recommends that any planning application is accompanied by a Physical Impact Assessment which considers the impact of any tall building proposal on privacy and overlooking and overshadowing.</p> <p>Figure 4.10 of the SPD illustrates how tall buildings should mitigate adverse effects on residential amenity and avoid over dominating existing homes and gardens. Loss of light, and overshadowing would be assessed during the consideration of a planning application.</p> <p>In addition, Policy QP3a (9)(g) states that proposals for tall buildings must be of the highest quality of design and demonstrate how they will maintain adequate distance between buildings to protect the amenity of existing and future residents (including consideration of privacy, day and sun-lighting and outlook).</p>

	<p>It should be noted that the SPD provides guidance, it does not allocate sites for development, nor is it intended to encourage the development of tall buildings. It does identify locations that present opportunities for tall buildings, which is what the Borough Local Plan states that it should do.</p> <p>Amend wording in Section 1 and other relevant locations of the draft SPD to ensure that the SPD is not interpreted to be encouraging the development of tall buildings, but to guide them to the right locations and indicate what might be appropriate in those locations.</p>
<p>No attempt to increase GP surgeries in Maidenhead, schools, or parking</p>	<p>This is not the purpose of this SPD. However, Principle 4.2 of the SPD does state that tall buildings in RBWM should have a clear role and purpose to deliver vital social, cultural or civic infrastructure.</p> <p>Policy IF1 of the BLP states that development proposals must, where appropriate, deliver infrastructure to support the overall spatial strategy of the Borough, including making contributions to the delivery of all relevant infrastructure projects included in the IDP in the form of financial contributions or on-site provision. Infrastructure and service provision would need to be assessed as part of the process of determining any planning application that is received. Any proposal for a tall building will need to take account of the policies of the BLP, national policies and the guidance included in the SPD and other relevant documents.</p>
<p>The draft SPD does not reflect the plans to build buildings of up to 25 storeys which have already been approved. The proposed view of how the town will look will therefore be substantially different to what you have portrayed. We therefore cannot make an informed decision on the basis of what is being presented.</p>	<p>Following public consultation, context heights in the Borough have been reassessed to make use of available digital data (Lidar based DTM and DSM data, and OS data), leading to more accurate results.</p> <p>It should be noted that planning permissions were granted on the Landings and Nicholson's sites prior to the consultation on the draft SPD.</p> <p>However, in response to the large number of comments received relating to Section 6 of the SPD and Maidenhead, additional View Impact Testing analysis was carried out following the consultation on specific sites within the town</p>

	<p>centre. The assessment utilises view testing to assess the potential appropriateness of heights at the two sites in respect of their impact on visual and townscape aspects. It should be noted that it does not take full account of other aspects such as heritage impacts, planning considerations, placemaking, viability or deliverability. These will need to be considered as part of the detailed appraisals required as part of a planning application on these sites.</p> <p>The testing of the impact of height scenarios on the Nicholson Site (Appendix A, Height Testing on key sites in Maidenhead Town Centre) concluded that a building above 16 storeys on this site would be considered out of scale and have a detrimental impact on Maidenhead’s townscape and heritage context. It is acknowledged that a planning permission is granted on the Nicholson Site for 25 storeys, that could lawfully be implemented. However, any new planning application for the Nicholson site would need to be in accord with this updated guidance.</p> <p>The SPD only provides guidance on proposed tall buildings, it does not allocate sites for development, nor is it intended to encourage the development of tall buildings. Any proposal for a tall building will need to take account of the policies of the BLP, national policies and the guidance included in the SPD and other relevant documents. This would be assessed during the consideration of a planning application.</p> <p>Amend text in Section 6 to clarify guidance on the town centre core.</p>
<p>The pandemic highlighted some of the downsides of living in high density blocks without private gardens. RBWM should re-assesses housing need in a post-covid world. Will demand be as high as previously thought? What sort of homes will people require? Please re-assess and show the residents updated data on which to make decisions.</p>	<p>The BLP aims to provide new homes that contribute to meeting the needs of the current and projected households within the Borough. The BLP aims to deliver a wide variety of high-quality homes that will provide the tenures, types and sizes of housing to meet the needs and demands of different people in the community. Included within that mix are both flatted developments (potentially in tall buildings) and houses.</p> <p>The SPD only provides guidance on proposed tall buildings, it does not allocate sites for development, nor is it intended to encourage the development of tall</p>

	<p>buildings. Any proposal for a tall building will need to take account of the policies of the BLP, national policies and the guidance included in the SPD and other relevant documents. This would be assessed during the consideration of a planning application.</p>
<p>Object to height of new development currently being constructed in Maidenhead which are totally out of keeping with the whole town centre.</p>	<p>Construction taking place in Maidenhead has already been granted planning permission.</p> <p>The SPD only provides guidance on proposed tall buildings, it does not allocate sites for development, nor is it intended to encourage the development of tall buildings. Any proposal for a tall building will need to take account of the policies of the BLP, national policies and the guidance included in the SPD and other relevant documents. This would be assessed during the consideration of a planning application.</p>
<p>The SPD overrides the guidance in the AAP, and there has been substantial intensification in general building heights to the extent that almost everything new in the town centre is now at least 20m tall.</p>	<p>The Maidenhead Area Action Plan was superseded by the Borough Local Plan. Following the adoption of the BLP, the MAAP is no longer used to determine planning applications.</p> <p>Paragraph 6.14.11 of the BLP states that, the Royal Borough will prepare a Building Height and Tall Buildings SPD. This will identify locations that present opportunities for tall buildings in the Royal Borough, together with site-specific recommendations on building height. It will provide additional detailed guidance on location, height and design of tall buildings and set application requirements for tall buildings. Clause 10 of Policy QP3a also states that further details and guidance on the application of the policy will be set out in a Building Height and Tall Buildings SPD.</p> <p>The SPD provides guidance, it does not allocate sites for development, nor is it intended to encourage the development of tall buildings. It does identify locations that present opportunities for tall buildings, which is what the Borough Local Plan indicates that it should do.</p> <p>Any proposal for a tall building will need to take account of the policies of the BLP, national policies and the guidance included in the SPD and other relevant</p>

	documents. This would be assessed during the consideration of a planning application.
No concerns with tall buildings proposed in Maidenhead Town Centre, but North Maidenhead and surrounding countryside (in particular Spencers Farm) should not have tall buildings as they are not in keeping with the local green open spaces and would obstruct local views.	Following public consultation, context heights in the Borough have been reassessed to make use of available digital data (Lidar based DTM and DSM data, and OS data), leading to more accurate results. Amend text in Table 5.1 to clarify that there is no opportunity for a tall building at M1 (Spencer's Farm).
Current RBWM Planning proposals Maidenhead Town Centre have not and will not conform to paragraph 2.1.2 of the NPPF: 'Good design is a key requirement. The tall blocks in St Ives Road give the town a sense of being enclosed and does not accord with sub paragraph 2.1.5 to 'promote social interaction and cohesion through mixed use developments'; 'healthy and safe'; and 'public open space'. The tall buildings increase a sense of isolation as well as being unsafe for the lone female to walk through given the reduced visibility for the pedestrian exacerbated with a lack of public open space.	This SPD does not put forward any planning proposals. One aspect of the SPD is the identification of the most appropriate locations within the Borough for tall buildings, if any planning applications including tall buildings are submitted to the Council. Any proposals submitted to the Council will need to take account of local and national policies, including the NPPF. The development on St Ives Road has been granted planning permission and has been built out. This SPD only provides guidance on proposed tall buildings, it does not allocate sites for development, nor is it intended to encourage the development of tall buildings. Any proposal for a tall building will need to take account of the policies of the BLP, national policies and the guidance included in the SPD and other relevant documents. This would be assessed during the consideration of a planning application.
The proposal to build over the last 'Green Lung' in the centre of Maidenhead i.e. the Golf Course, removes wildlife habitat, public open space and a clean air contributor to the environment	The principle of development on the South West Maidenhead Placemaking Area was established when the BLP was adopted in February 2022. The issues raised here were considered and responded to during the BLP examination process and South West Maidenhead Placemaking Area SPD consultation. On Thursday 15 December 2022 the Council adopted the South West Maidenhead Development Framework Supplementary Planning Document.
Maidenhead is being destroyed by tall buildings. It was an historic market town with surrounding villages having uninterrupted views, however, all that can be seen are the skyscrapers that have been plonked in Maidenhead for no other reason than financial gain.	This SPD only provides guidance on proposed tall buildings, it does not allocate sites for development, nor is it intended to encourage the development of tall buildings. Any proposal for a tall building will need to take account of the policies of the BLP, national policies and the guidance included in the SPD and other relevant documents.

<p>The Council is only interested in destroying every piece of green space, decimating bio diversity and destroying the views for people living outside the boundaries of the town.</p>	<p>Amend wording in Section 1 and other relevant locations of the draft SPD to ensure that the SPD is not interpreted to be encouraging the development of tall buildings, but to guide them to the right locations and indicate what might be appropriate in those locations.</p>
<p>Windsor</p>	
<p>The Council's intentions for tall and larger buildings in Windsor should be clearly explained and larger scale maps are needed, at least for the areas W5 and W7.</p>	<p>Following public consultation, context heights in the Borough have been reassessed to make use of available digital data (Lidar based DTM and DSM data, and OS data), leading to more accurate results.</p> <p>The more detailed site analyses that have been included in the SPD relate to the sites within the Borough that have been identified as being the most appropriate for tall buildings, should any planning applications come forward that include tall buildings.</p> <p>Amend Table 5.1 of the SPD has been amended to make clear that there is no opportunity for a tall building in either W5 or W7.</p>
<p>W5 and W7 should be shown in context maps in the same way and at a similar scale as for the Maidenhead Town Centre sites.</p>	<p>Following public consultation, context heights in the Borough have been reassessed to make use of available digital data (Lidar based DTM and DSM data, and OS data), leading to more accurate results.</p> <p>The more detailed site analyses that have been included in the SPD relate to the sites within the Borough that have been identified as being the most appropriate for tall buildings, should any planning applications come forward that include tall buildings.</p> <p>Amend Table 5.1 of the SPD has been amended to make clear that there is no opportunity for a tall building in either W5 or W7.</p>
<p>Context heights incorrect on Vansittart Road</p>	<p>The context heights identified in the SPD follow a robust methodology and are considered appropriate.</p>

	<p>Following public consultation, context heights in the Borough have been reassessed to make use of available digital data (Lidar based DTM and DSM data, and OS data), leading to more accurate results.</p> <p>Paragraph 2.1.6 explains the five common area types identified by the context height analysis. Area Type A is a mix of 1-2 storey buildings with a context height of 5m. Area Type B includes predominantly 2 storey buildings at 7m. These categorisations are based on the above mentioned height mapping methodology and are considered to be a fair and accurate representation of the context heights found within the borough.</p>
W3 is Tesco not Sainsbury	<p>Noted.</p> <p>Amend Table 5.1 of the SPD to correct the text for W3.</p>
There is no mention of Sawyer's Close which are very tall buildings	<p>Sawyers Close is shown on Figure 2.3</p> <p>Amend Figure 2.3 to show Sawyers Close more clearly.</p> <p>A note under Figure 2.3 of the SPD does mention Sawyers Close.</p> <p>Amend note under Figure 2.3 of the SPD for clarity.</p> <p>Note: Sawyers Close (SC) in Windsor comprises of 4 towers of approximately 8 storeys. These are considered to be exceptional buildings within a campus style area with single storey garage and other buildings. The context height here is categorised as Context Height Area A. Any development proposal for this site will need to respond to the unique context of the site through a masterplan led approach that can establish its own context height.</p>
No tall buildings should be allowed to be built in Windsor in order to maintain and protect the character of the town.	<p>The SPD acknowledges that there is no opportunity for a tall building in Windsor town centre.</p> <p>The only site in Windsor that could be appropriate for a single tall building is the W3 site on Dedworth Road. This site has been identified as having the potential to accommodate a single building of no more than 4 storeys. However, a per Table 5.1 of the SPD, any proposed for a single tall building would need to test the impact of that tall building on the urban form, ensuring that proposals do not</p>

	<p>result in adverse impacts on the Victorian Village character and do not alter or overwhelm the narrow buildings plots and terraces that are typical of the settlement. The legibility of the townscape would also need to be carefully considered in order to ensure that proposed development would provide positive new focal points and do not detract from existing positive focal points such as churches, schools and public houses.</p> <p>It should be noted that this SPD only provides guidance on proposed tall buildings, it does not allocate sites for development, nor is it intended to encourage the development of tall buildings. Any proposal for a tall building will need to take account of the policies of the BLP, national policies and the guidance included in the SPD and other relevant documents.</p>
Unclear who would benefit from a further larger building in Dedworth.	<p>Noted.</p> <p>It should be noted that this SPD only provides guidance on proposed tall buildings, it does not allocate sites for development, nor is it intended to encourage the development of tall buildings. Any proposal for a tall building will need to take account of the policies of the BLP, national policies and the guidance included in the SPD and other relevant documents.</p>

1. INTRODUCTION		
Paragraph Number	Summary of Representation	Council Response
1.1.3	<p>Would be more appropriate to relate this strategy to the built up areas and allocated sites rather than the Borough as a whole.</p> <p>Note that the evidence base upon which the SPD is based is fundamentally focussed around a review of existing built up areas and allocations, rather than land beyond them.</p>	<p>Paragraph 6.14.11 of the BLP states that, the Royal Borough will prepare a Building Height and Tall Buildings SPD. This will identify locations that present opportunities for tall buildings in the Royal Borough, together with site-specific recommendations on building height. It will provide additional detailed guidance on location, height and design of tall buildings and set application requirements for tall buildings. Clause 10 of Policy QP3a also states that further details and guidance on the application of the policy will be set out in a Building Height and Tall Buildings SPD.</p>

		<p>The SPD provides guidance, it does not allocate sites for development, nor is it intended to encourage the development of tall buildings. It does identify locations that present opportunities for tall buildings, which is what the Borough Local Plan indicates that it should do.</p> <p>Section 5 of the SPD also provides clear, specific guidance on what may or may not be appropriate in specific locations across the Borough. Section 6 does the same for the sites in Maidenhead Town Centre, with maps and tables clearly stating the findings and recommendations of the SPD.</p> <p>Section 5.1 of the SPD is entitled 'Inappropriate And Sensitive Areas', and paragraph 5.1.1 states: Based on a thorough assessment of heritage and townscape sensitivities and an understanding of the borough's green belt and flood risk areas, two types of areas have been distinguished:</p> <ul style="list-style-type: none"> • Areas that by their nature are inappropriate for tall buildings; and • Areas that are sensitive to tall buildings. <p>In addition, Principle 5.3 on page 46 of the SPD states that development for generally increased context height, large buildings and tall buildings in the Royal Borough of Windsor and Maidenhead should only be promoted on sites indicated in Figures 5.2 -5.7.</p> <p>However, additional wording will be added to the SPD to help make this clearer throughout the document.</p> <p>Amend wording in Section 1 and other relevant locations of the draft SPD to ensure that the SPD is not interpreted to be encouraging the development of tall buildings, but to guide them to the right locations and indicate what might be appropriate in those locations.</p>
1.3.3	Scope should also include specific reference to the emerging Boroughwide Heritage Strategy and Action plan.	Noted, however, this SPD cannot reasonably consider documents that do not currently exist. Protecting and enhancing the Borough's heritage assets,

		<p>protected landscapes and their settings is one of the key principles within the SPD.</p> <p>Section 1.5 of the SPD explains the Policy Context and covers the Historic England Advice Note 4 on Tall Buildings. As mentioned in paragraph 1.5.8, the SPD aligns closely to the Historic England advice note to ensure it is based on best practice guidance.</p> <p>The Townscape and Heritage Assessment Criteria column of Table 5.1 in the SPD also clearly states (for multiple relevant locations) that proposals for any taller building should be discussed at the earliest opportunity with RBWM and Historic England.</p> <p>It should also be noted that any proposal for development must comply with Policy HE1 of the BLP which states that the historic environment will be conserved and enhanced in a manner appropriate to its significance.</p>
1.3.3	Scope should also include specific reference to the 'Vision of Windsor'.	<p>The Vision for Windsor project was only in its formative stages when the SPD was consulted upon. The Council believes that this SPD complements the Vision for Windsor.</p> <p>Any proposal for a tall building will need to take account of the policies of the BLP, national policies and be informed by the guidance included in the SPD and other relevant documents including the Borough Wide Design Guide.</p>
1.3.3	This paragraph is Incorrect; Neighbourhood Plans cannot be superseded This needs to be redrafted	<p>Noted.</p> <p>Paragraph 1.3.3 does not state that the SPD supersedes Neighbourhood Plans States that the SPD should be read in conjunction with a range of 'detailed topic' and 'locally specific' design documents and lists examples.</p>
1.3.3	SPD deviates from the Inspectors comments for the BLP	Noted. The Council does not believe this to be the case.
1.5.5 – 1.5.8	The SPD must make it clear that the only place within the Borough where building heights above 2.5 times the context height may be acceptable is within Maidenhead Town Centre.	<p>This is made clear in Section 3 of the SPD.</p> <p>Paragraph 3.2.10 states that the only place in the Royal Borough where a tall building of district landmark scale can be considered is in the town centre of Maidenhead.</p>

		<p>Amend text in Principle 3.1 has also been amended to make this even clearer.</p> <p>Policy QP3a (5) of the BLP is also clear that other than in Maidenhead Town Centre, building heights of above 2.5 times the context height will not generally be appropriate.</p>
1.5.9	Definition for 'storeys' should be adjacent to tall building definition in point 4 of this paragraph	<p>Noted.</p> <p>Paragraph 2.1.8 of the SPD includes a definition of the term 'storey'.</p>
1.5.10	The definition of 'large building' should be included in point 4 of this paragraph.	<p>Noted.</p> <p>This paragraph repeats in full the text from the BLP Policy QP3a. The definition of a tall building is included in point 5 of this paragraph (Clause 5 of QP3a).</p>

2. GENERAL APPROACH TO BUILDING HEIGHT		
Paragraph Number	Summary of Representation	Council Response
General	<p>The following sites are incorrectly categorised:</p> <ul style="list-style-type: none"> - Windsor Leisure Centre: This should be shown as a 3 or 4 storey building on its own; - Combermere Barracks: should be separately categorised as a 4-storey area; - The section of St Leonards Road from Sinclair Road to Maple Court is 3 storeys; - The developments fronting Fountain Roundabout on the A308 are mostly 4 and 5 storeys but categorised as 3; - The development now under construction at Goslar Way/Imperial Road quadrant is 5 storey not 2; 	<p>Following public consultation, context heights in the Borough have been reassessed to make use of available digital data (Lidar based DTM and DSM data, and OS data), leading to more accurate results. The context heights identified in the SPD follow a robust methodology and are considered appropriate.</p> <p>Paragraph 2.1.6 explains the five common area types identified by the context height analysis. Area Type A is a mix of 1-2 storey buildings with a context height of 5m. Area Type B includes predominantly 2 storey buildings at 7m. These categorisations are based on the above mentioned height mapping methodology and are considered to be a fair and accurate representation of the context heights found within the borough.</p> <p>Sawyers Close is shown on Figure 2.3.</p>

	<ul style="list-style-type: none"> - The committee is not convinced that Sawyers Close should be treated as an anomaly. It is a large self-contained site mostly surrounded by open space and is not viewed in the context of nearby housing. Categorising the site as only 2 storeys could deter future redevelopment. - The Sawyers Close designation on the map has been placed next to the Centric Building opposite and not on Sawyers Close, which many people may overlook and thus miss the opportunity to comment. - Stephenson's Drive, Clewer, is not given a context. 	<p>Amend Figure 2.3 to show Sawyers Close more clearly.</p> <p>A note under Figure 2.3 of the SPD does mention Sawyers Close.</p> <p>Amend note under Figure 2.3 of the SPD for clarity. Note: Sawyers Close (SC) in Windsor comprises of 4 towers of approximately 8 storeys. These are considered to be exceptional buildings within a campus style area with single storey garage and other buildings. The context height here is categorised as Context Height Area A. Any development proposal for this site will need to respond to the unique context of the site through a masterplan led approach that can establish its own context height.</p>
2.1	The context height for the Ascot Business Park area and Silwood Park should be 2-storeys	Following public consultation, context heights in the Borough have been reassessed to make use of available digital data (Lidar based DTM and DSM data, and OS data), leading to more accurate results. The context heights identified in the SPD follow a robust methodology and are considered appropriate.
2.1 to 2.6	These figures completely and systematically omit the inclusion of any road names. The River Thames is also completely omitted. This renders the figures vague diagrams only. This needs to be amended and a greater degree of detail required to enable the designated areas to be properly and clearly understood and correctly interpreted.	Given the format of the SPD document and the large areas it covers, the SPD aims to provide an overview of map content and therefore omits some map detail including street names as this would make diagrams illegible. Amend maps in SPD to make more legible. For example, add the River Thames to maps 2.1 to 2.6.
2.1.4	This brief definition of the term 'context height' leaves out more than it includes. A standard formula cannot be applied to the different character areas across the Borough.	Following public consultation, context heights in the Borough have been reassessed to make use of available digital data (Lidar based DTM and DSM data, and OS data), leading to more accurate results. The context heights identified in the SPD follow a robust methodology and are considered appropriate. Paragraph 2.1.6 explains the five common area types identified by the context height analysis. Area Type A is a mix of 1-2 storey buildings with a context height of 5m. Area Type B includes predominantly 2 storey buildings at 7m. These categorisations are based on the above mentioned height mapping methodology

		<p>and are considered to be a fair and accurate representation of the context heights found within the borough.</p> <p>The SPD takes account of the unique aspects and different character areas within the Borough. Context heights are one aspect within the wider assessment used to set out in detail what the Council considers to be appropriate in terms of building heights in the Borough and of achieving the main purposes of the SPD as stated in paragraph 1.2.1.</p>
2.1.6	Includes an explanation of the term 'storeys' which is important and would be helpful if it was included adjacent to the tall building definition (paragraph 1.5.9 point 4)	<p>Noted.</p> <p>Paragraph 2.1.8 of the SPD includes a definition of the term 'storey'.</p>
Fig. 2.1	It would be logical to note the existing heights at Bray Studios, noting these are tall in the context of the Borough, particularly outside of the built up areas.	<p>Paragraph 2.1.4 explains that the SPD has mapped the prevailing broad context height of the Royal Borough using the latest available datasets, which is represented in Figures 2.1-2.6 of the document.</p> <p>In addition, paragraph 2.1.5 explains that the context height is the height that an observer would read as the typical or defining height of a particular area. In places that are consistent in height, the context height may be the most commonly occurring building height. In more varied height environments, the context height may be the average height that buildings fluctuate around.</p> <p>Following public consultation, context heights in the Borough have been reassessed to make use of available digital data (Lidar based DTM and DSM data, and OS data), leading to more accurate results. The context heights identified in the SPD follow a robust methodology and are considered appropriate.</p>
Fig. 2.2	The existing context height on Shoppenhangers Road is two storeys, not three.	<p>Following public consultation, context heights in the Borough have been reassessed to make use of available digital data (Lidar based DTM and DSM data, and OS data), leading to more accurate results. The context heights identified in the SPD follow a robust methodology and are considered appropriate.</p>

		The majority of Shoppenhangers Road is shown on Figure 2.1 of the SPD as being within a context height range of two storeys.
2.2	Support general acceptance that there is potential to increase the general heights beyond existing context on large greenfield sites but concerned that the very generic broad brush comment of only increasing height by up to one storey is too restrictive. The SPD does not provide sufficient caveats to cater for different scenarios and reinforces the point that it would be better placed focusing upon the existing built up areas and allocations.	<p>Paragraph 2.2 of the SPD provides further guidance and states that on large redevelopment sites and appropriate greenfield sites there may be an opportunity to increase the general height beyond the existing context height to deliver sustainable settlements and make efficient use of land. This increase to the existing context height should not normally exceed one storey in suburban areas, or two storeys in Maidenhead town centre locations, if appropriate.</p> <p>Paragraph 2.2.4 states that establishing the new context height for a large development area should involve a masterplanning approach and testing undertaken in consultation with the local authority. Developers proposing to increase the context height on their lands will need to demonstrate how the new height approach will deliver successful place making, responds to the existing townscape character, and transitions appropriately with the existing build fabric. Townscape, Landscape, Heritage and Visual Impact appraisals may be required to support proposals for increased heights.</p> <p>It should be noted that BLP Policy QP3a Clause 3 states that where development is proposed on large greenfield sites that lack a relevant development context, the appropriate future height of buildings should be established through the Placemaking SPD or Stakeholder Masterplan process (as relevant).</p> <p>The SPD takes account of the unique aspects and different character areas within the Borough. Context heights are one aspect within the wider assessment used to set out in detail what the Council considers to be appropriate in terms of building heights in the Borough and of achieving the main purposes of the SPD as stated in paragraph 1.2.1.</p>
2.2	Sunninghill and Ascot Parish Council are against a 3-storey context height for the A3 Shorts Waste Transfer Station. There are no highly urban towns in the Ascot area – Ascot is a district centre. The existing High Street has a mix of 2 and 3 storey buildings and has a Townscape Categorisation	Following public consultation, context heights in the Borough have been reassessed to make use of available digital data (Lidar based DTM and DSM data, and OS data), leading to more accurate results. The context heights identified in the SPD follow a robust methodology and are considered appropriate.

	<p>of 'Victorian Village' and Principle 2.1 should therefore apply.</p>	<p>Paragraph 2.1.6 explains the five common area types identified by the context height analysis. Area Type A is a mix of 1-2 storey buildings with a context height of 5m. Area Type B includes predominantly 2 storey buildings at 7m. These categorisations are based on the above mentioned height mapping methodology and are considered to be a fair and accurate representation of the context heights found within the borough.</p> <p>The SPD takes account of the unique aspects and different character areas within the Borough. Context heights are one aspect within the wider assessment used to set out in detail what the Council considers to be appropriate in terms of building heights in the Borough and of achieving the main purposes of the SPD as stated in paragraph 1.2.1.</p> <p>Any proposal for a tall building will need to take account of the policies of the BLP, national policies and be informed by the guidance included in the SPD and other relevant documents including the Borough Wide Design Guide.</p>
2.2.1	<p>The SPD indicates that within Cookham the prevailing (or context) building height is generally two-storey and paragraph 2.2.1 implies new development should reflect this. The Parish would agree with this and request this is clarified in the SPD.</p>	<p>Sections 5 and 6 of the SPD provide site specific recommendations of where tall buildings may be appropriate. The SPD does not identify any location in Cookham as being appropriate for tall buildings.</p>
2.2.2	<p>Land taken from greenfield should not be extended in height as it should remain in context of the area around Higher buildings in previous greenfield land will alter the area significantly and impact on wildlife</p>	<p>Principle 2.2 states that on large greenfield or regeneration sites, it may be appropriate to increase the general height beyond the existing context height by one storey or up to two storeys in highly urban town centre locations.</p> <p>However, paragraph 2.2.4 states that establishing the new context height for a large development area should involve a masterplanning approach and testing undertaken in consultation with the local authority. Developers proposing to increase the context height on their lands will need to demonstrate how the new height approach will deliver successful place making, responds to the existing townscape character, and transitions appropriately with the existing build fabric. Townscape, Landscape, Heritage and Visual Impact appraisals may be</p>

		<p>required to support proposals for increased heights.</p> <p>It should be noted that BLP Policy QP3a Clause 3 states that where development is proposed on large greenfield sites that lack a relevant development context, the appropriate future height of buildings should be established through the Placemaking SPD or Stakeholder Masterplan process (as relevant).</p> <p>The SPD takes account of the unique aspects and different character areas within the Borough. Context heights are one aspect within the wider assessment used to set out in detail what the Council considers to be appropriate in terms of building heights in the Borough and of achieving the main purposes of the SPD as stated in paragraph 1.2.1.</p> <p>Any proposal for a tall building will need to take account of the policies of the BLP, national policies and be informed by the guidance included in the SPD and other relevant documents including the Borough Wide Design Guide.</p>
2.2.2	Support suggestion which notes there is an opportunity to increase general height beyond the existing context on large redevelopment sites and appropriate green field sites to make efficient use of land.	Noted.
2.2.3	The impact of taller buildings at this paragraph needs to be extended (analysis and recommendations) to state that Cookham is an inappropriate location for additional height (due to impact on the special artistic and cultural setting and significance of the conservation area and Cookham as a whole).	<p>Following public consultation, context heights in the Borough have been reassessed to make use of available digital data (Lidar based DTM and DSM data, and OS data), leading to more accurate results. The context heights identified in the SPD follow a robust methodology and are considered appropriate.</p> <p>Amend Table 5.1 (C1, C2) in the SPD to state that there is no opportunity for a tall building in Cookham as this would overwhelm existing context. However, there may be potential for a building with a maximum of 3 storeys to mark the rail station, subject to responding sensitively to existing townscape and heritage assets. As a mixed-use building this should contribute to local activities and reinforce the station node.</p>

		Any proposal for a tall building will need to take account of the policies of the BLP, national policies and be informed by the guidance included in the SPD and other relevant documents including the Borough Wide Design Guide.
Fig. 2.3	Incorrect. The Sawyers Close marked area is Centrica office buildings north of the Maidenhead Road. Sawyers Close is south of the Maidenhead Road	Noted. Amend Figure 2.3 to show Sawyers Close correctly.
Fig. 2.3	Amendment requested: Explicitly acknowledge the acceptability of tall buildings at the Sawyer Close site in Windsor. Request Sawyers Close is recognised as its own Area of Height; it should not be identified as an exception within Area B, but instead identified as a new Area F for 8+ storeys and shown on an updated Figure 2.3 on page 17 of the SPD.	Sawyer's close accommodates four 8 storey residential towers in a campus style green setting, interspersed by garage courts. The towers are perceived as significant exceptions in their local and wider suburban low-rise context. Due to the wide spacing of the towers and their standalone nature the area is not perceived as a place with an urban and intense 8 storey context, but as a place with tall buildings amidst a free-flowing green space. As such the area cannot be defined as an area with an 8-storey height context. The data-based context height assessment also identifies this area as having a context height of 1 storey with four tall buildings. The buildings at Sawyers Close are considered to be exceptional buildings within a wider area that is generally 2 storeys in height, and therefore are categorised as part of Context Height Area B (2 storeys). Amend Figure 2.3 to show Sawyers Close more clearly. A note under Figure 2.3 of the SPD does mention Sawyers Close. Amend note under Figure 2.3 of the SPD for clarity. Note: Sawyers Close (SC) in Windsor comprises of 4 towers of approximately 8 storeys. These are considered to be exceptional buildings within a campus style area with single storey garage and other buildings. The context height here is categorised as Context Height Area A. Any development proposal for this site will need to respond to the unique context of the site through a masterplan led approach that can establish its own context height.

		The redevelopment of the Sawyers Close site will also be guided by the Stakeholder Masterplan Document for that site.
Fig. 2.3	Significant areas within the Historic Town Fringes (2A) and Mountbatten Estate (11G), as identified in the RBWM Townscape Assessment Vol.2, have a prevailing height of 5 storeys, not 4 storeys as identified in Figure 2.3 of the SPD. Suggest the contextual height for this zone is reappraised so that the baseline better reflects the higher scale and massing that is already characteristic to the west of the town centre. Consider the lower contextual height stated in the emerging SPG could be too prohibitive	Following public consultation, context heights in the Borough have been reassessed to make use of available digital data (Lidar based DTM and DSM data, and OS data), leading to more accurate results. The context heights identified in the SPD follow a robust methodology and are considered appropriate. Paragraph 2.1.6 explains the five common area types identified by the context height analysis. Area Type A is a mix of 1-2 storey buildings with a context height of 5m. Area Type B includes predominantly 2 storey buildings at 7m. These categorisations are based on the above mentioned height mapping methodology and are considered to be a fair and accurate representation of the context heights found within the borough.
Fig. 2.5	Plan incorrect, context heights are wrong	Following public consultation, context heights in the Borough have been reassessed to make use of available digital data (Lidar based DTM and DSM data, and OS data), leading to more accurate results. The context heights identified in the SPD follow a robust methodology and are considered appropriate.

3. DEFINING TALL BUILDINGS		
Paragraph Number	Summary of Representation	Council Response
3.1	Incorrect context heights - in an area that is predominantly two-storeys in height and defined as having a 'context height' of 7 metres, or 2 storeys, then 1.5 times this would be 10.5 metres, or 3 storeys. However, Table 3.1 indicates that in this example 1.5 times the context height would be 13 metres or 4 storeys. This is wrong and could result in misleading applications and decision makers, leading to schemes that are inappropriate to the context (across the Borough, not just in Cookham).	Table 3.1 identifies at what height a building is considered a tall building (local landmark) for each context area type. It defines the lower threshold for a Local Landmark as 1.5x Context Height or <u>a minimum of two additional storeys (6m)</u> (emphasis added here) - see asterisk underneath Table 3.1. This is to avoid the classification of 3 storey buildings as 'tall' in 2 storey contexts. In the context of Cookham, the SPD clearly states that the maximum height of any large building in Cookham (C1 and C2 in Table 5.1) should be a maximum of 3 storeys.

		Amend text in Table 5.1 to clarify that there is no opportunity for a tall building on any of the sites in Cookham.
3.1	Table 3.1 suggests in Cookham Village and Cookham Rise buildings up to five storeys may be appropriate and in Cookham Dean up to four storeys. This is contrary to paragraph 2.2.1.	<p>Table 3.1 does not represent an expression of appropriateness for tall buildings in a respective height zone. Section 5 and 6 of the SPD provide site specific recommendations of where tall buildings may be appropriate. The SPD has been amended to make clear that there is no opportunity for any tall buildings in Cookham.</p> <p>Table 3.1 identifies at what height a building is considered a tall building (local landmark) for each context area type. It defines the lower threshold for a Local Landmark as 1.5x Context Height or <u>a minimum of two additional storeys (6m)</u> (emphasis added here) - see asterix underneath Table 3.1. This is to avoid the classification of 3 storey buildings as 'tall' in 2 storey contexts.</p> <p>In the context of Cookham, the SPD clearly states that the maximum height of any large building in Cookham (C1 and C2 in Table 5.1) should be a maximum of 3 storeys.</p> <p>Amend text in Table 5.1 to clarify that there is no opportunity for a tall building on any of the sites in Cookham.</p>
3.1	Request for clarification as to larger building height in a 3-storey area	Buildings up to 1.5x context height are considered large buildings. A large building is a contextual building that provides a local height accent, for example with a slightly taller corner element, and by this contributes to a varied urban fabric.
Table 3.1 Code C	Code C includes housing estates. In Windsor these are generally 2 storey so more appropriately ought to be in Code B.	<p>Code C ranges from 2-4 storeys.</p> <p>Following public consultation, context heights in the Borough have been reassessed to make use of available digital data (Lidar based DTM and DSM data, and OS data), leading to more accurate results. The context heights identified in the SPD follow a robust methodology and are considered appropriate.</p>
3.1	Sawyers Close in Windsor should also be identified as an opportunity for District Landmark Buildings (2.5-5x context height).	Sawyer's close accommodates four 8 storey residential towers in a campus style green setting, interspersed by garage courts. The towers are perceived as significant exceptions in their local and wider suburban low-rise context. Due to

		<p>the wide spacing of the towers and their standalone nature the area is not perceived as a place with an urban and intense 8 storey context, but as a place with tall buildings amidst a free-flowing green space. As such the area cannot be defined as an area with an 8-storey height context. The data-based context height assessment also identifies this area as having a context height of 1 storey with four tall buildings.</p> <p>The buildings at Sawyers Close are considered to be exceptional buildings within a wider area that is generally 2 storeys in height, and therefore are categorised as part of Context Height Area B (2 storeys).</p> <p>Amend note under Figure 2.3 of the SPD for clarity. Note: Sawyers Close (SC) in Windsor comprises of 4 towers of approximately 8 storeys. These are considered to be exceptional buildings within a campus style area with single storey garage and other buildings. The context height here is categorised as Context Height Area A. Any development proposal for this site will need to respond to the unique context of the site through a masterplan led approach that can establish its own context height.</p> <p>The redevelopment of the Sawyers Close site will also be guided by the Stakeholder Masterplan Document for that site.</p>
Figure 3.1 and Table 3.1	<p>Raise concerns over the application of Figure 3.1 and Table 3.1 in guiding assessments of development. Whilst potentially useful guiding principle, consider the low contextual height of the baseline townscape west of Windsor will be too prohibitive in making a case for increases to the contextual height, even if all the principles for tall buildings are met.</p> <p>Policy constraints will potentially limit any real increase in context height.</p>	<p>Following public consultation, context heights in the Borough have been reassessed to make use of available digital data (Lidar based DTM and DSM data, and OS data), leading to more accurate results. The context heights identified in the SPD follow a robust methodology and are considered appropriate.</p> <p>Windsor Yard is included in the Windsor Town Centre Conservation Area and as such of high sensitivity and inappropriate for tall buildings. No change has been made to the assessment of this site.</p>
3.1.2	<p>The statement that in many of the 1 and 2 storey areas of the Borough a 4-storey building would be considered a tall building, is at variance with Figure 3.1, where in areas with</p>	<p>Paragraph 3.1.2 states that in many of the one and two storey low rise housing areas of the Royal Borough a four-storey building would be considered a tall building.</p>

	1-2 storey context height, a 3-storey building is considered tall.	<p>Figure 3.1 shows that the upper threshold for a local landmark in an area with a 1-2 storey context height could theoretically be 4 storeys.</p> <p>There is no contradiction between paragraph 3.1.2 and Figure 3.1.</p>
3.2.6 5.2.5	Local Landmark buildings may be appropriate in an urban setting, but not within historic / rural settings such as Cookham (inc. Village Dean and Rise)	<p>Table 3.1 does not represent an expression of appropriateness for tall buildings in a respective height zone. Section 5 and 6 of the SPD provide site specific recommendations of where tall buildings may be appropriate. The SPD has been amended to make clear that there is no opportunity for any tall buildings in Cookham.</p> <p>Table 3.1 identifies at what height a building is considered a tall building (local landmark) for each context area type. It defines the lower threshold for a Local Landmark as 1.5x Context Height or <u>a minimum of two additional storeys (6m)</u> (emphasis added here) - see asterix underneath Table 3.1. This is to avoid the classification of 3 storey buildings as 'tall' in 2 storey contexts.</p> <p>In the context of Cookham, the SPD clearly states that the maximum height of any large building in Cookham (C1 and C2 in Table 5.1) should be a maximum of 3 storeys.</p> <p>Amend text in Table 5.1 to clarify that there is no opportunity for a tall building on any of the sites in Cookham.</p>
3.2.12	Includes a definition of “large buildings” – it would be helpful if this definition could be included at an earlier point in the SPD (e.g. with the tall building definition at paragraph 1.5.10 point 4)	<p>Paragraph 1.5.10 includes the full wording of BLP Policy QP3a, there is no definition of a large building in policy QP3a.</p> <p>It is considered more appropriate to include the definition of large building in Section 3 which focuses specifically on defining what a tall building is, and what it is not.</p>
3.2.12	Suggest the paragraph needs clarification. Does it imply that larger buildings can only be used to provide local accents, or are they allowed more generally the whole of a site?	Paragraph 3.2.12 states that a large building is a contextual building that provides a local height accent. There is no suggestion in the text that this is the only purpose for a large building.

		Any development proposal that includes a large building will need to take account of the policies of the BLP, national policies and be informed by the guidance included in the SPD and other relevant documents including the Borough Wide Design Guide.
3.20	Demonstrates that tall buildings on Green Belt land cannot be sustainable. The detrimental impact of tall buildings on the golf course and Rushington Copse would be irreversible.	<p>The principle of development in the South West Maidenhead Placemaking Area was established when the BLP was adopted in February 2022. The issues raised here were considered and responded to during the BLP examination process and South West Maidenhead Placemaking Area SPD consultation. On 15 December 2022 the Council adopted the South West Maidenhead Development Framework Supplementary Planning Document.</p> <p>Any development proposal that includes a tall building will need to take account of the policies of the BLP, national policies and be informed by the guidance included in the SPD and other relevant documents including the Borough Wide Design Guide. It should be noted that the AL13 site proforma in the BLP requires that Rushington Copse be retained as part of any development proposal.</p>
3.2.8	Landmark building at LM7 would be situated between 2 two-storey residential areas and divorced from the real town centre. Indicates AOD at Bell Street is 28m, AOD at Courtlands is 31m and AOD at northern end of golf course is 43m	<p>Following public consultation, context heights in the Borough have been reassessed to make use of available digital data (Lidar based DTM and DSM data, and OS data), leading to more accurate results. The context heights identified in the SPD follow a robust methodology and are considered appropriate.</p> <p>Any planning application received will need to carefully consider AOD. Paragraph 4.7.8 states that tall building proposals should be understood both in terms of their height above ground and their height above ordnance datum.</p> <p>Section 6 of the SPD also states that any tall building on LM7 should be tested in long views to avoid dominating (and appearing taller on the skyline) than the proposed other landmarks in the town centre.</p>

4. TALL BUILDINGS PRINCIPLES

Paragraph Number	Summary of Representation	Council Response
General	<p>The images and photos in Section 4 emphasise the urban nature of the strategy and are buildings and heights that would be wholly inappropriate for Cookham and much of the Royal Borough as a whole.</p> <p>A more nuanced approach to the form and nature of tall buildings in the context of the Royal Borough and its hierarchy of settlements should be more accurately reflected in the diagrams and images used, and what the implications of tall buildings are in this context.</p>	<p>Section 5 of the SPD also provides clear, specific guidance on what may or may not be appropriate in specific locations across the Borough, including Cookham. Section 6 does the same for the sites in Maidenhead Town Centre, with maps and tables clearly stating the findings and recommendations of the SPD.</p> <p>The SPD is intended to ensure that any tall building applications that are permitted are of the highest possible quality. The SPD does not permit tall buildings or allocate sites for tall buildings. The intention of the SPD is to give the Council more control over what tall buildings are, or are not, permitted within the Borough.</p> <p>Any development proposal that includes tall buildings will need to take account of the policies of the BLP, national policies and be informed by the guidance included in the SPD and other relevant documents including the Borough Wide Design Guide.</p>
General	<p>Irreversible planning approvals have been granted for a number of extraordinarily tall buildings in Maidenhead. Some may never be built. This is where the principles of the SPD then come into play to ensure that those mistakes and others like them will not happen again. The SPD sets out 10 key principles of how these objectives should be met. These are pretty comprehensive.</p>	<p>Noted. Support for the 10 key principles is welcomed.</p>
General	<p>Should the Council decide to include Green Belt land within the remit of the SPD, the Bray studios site should be included within the SPD as an appropriate location for tall buildings.</p>	<p>Section 5 of the SPD provides clear, specific guidance on what may or may not be appropriate in specific locations across the Borough. Para 5.1.6 states that it is likely that a tall building would be considered inappropriate development in the Green Belt.</p>
General	<p>Generally supportive of the principles set out in this section. They provide a robust framework for considering proposals for tall buildings generally and are sufficiently clear so that section 6 does not need to be so prescriptive.</p>	<p>Noted. Support for the 10 key principles is welcomed.</p> <p>The Council does not accept that section 6 is overly prescriptive. Section 6 provides clarity on height parameters for potential tall buildings in Maidenhead which is consistent with the methodology adopted by this SPD and responds to requirements in the NPPF (para 127) on providing clarity. Section 4 provides</p>

	The sites identified for tall buildings in section 6 is not an exhaustive list of sites which can meet these tests or comply with these principles.	design principles but not area specific location principles, and both are needed to appropriate guide tall buildings.
General	<p>This section should make it clear that proposals for development which meet these principles and other policies in the Local Plan will be permitted. The way in which the SPD is drafted seems to imply that tall buildings can only come forward in the specific locations identified in Figure 6.3.</p> <p>This is a negative rather than an enabling policy which is at odds with the need to deliver the housing numbers set out in the Local Plan for the town centre and national policy</p>	<p>The principle of an SPD to support the BLP and BLP Policy QP3a was established following the adoption of the BLP in 2022. Clause 10 of Policy QP3a also states that further details and guidance on the application of the policy will be set out in a Building Height and Tall Buildings SPD.</p> <p>Paragraph 6.14.11 of the BLP states that, the Royal Borough will prepare a Building Height and Tall Buildings SPD. This will identify locations that present opportunities for tall buildings in the Royal Borough, together with site-specific recommendations on building height. It will provide additional detailed guidance on location, height and design of tall buildings and set application requirements for tall buildings.</p> <p>The SPD provides guidance, it does not allocate sites for development, nor is it intended to encourage the development of tall buildings. It does identify locations that present opportunities for tall buildings, which is what the Borough Local Plan indicates that it should do.</p> <p>The SPD is intended to ensure that any tall building applications that are permitted are of the highest possible quality. The SPD does not permit tall buildings or allocate sites for tall buildings. The intention of the SPD is to give the Council more control over what tall buildings are, or are not, permitted within the Borough.</p>
General	The analysis in the SPD does not appear to have looked at potential impacts on the capacity of site allocations within the town centre. This has the indirect and unintentional effect of changing adopted policy, which goes beyond the scope of SPDs. It also runs counter to Section 11 of the NPPF.	<p>The testing of site capacity is beyond the scope of this SPD.</p> <p>The principle of an SPD to support the BLP and BLP Policy QP3a was established following the adoption of the BLP in 2022.</p> <p>Paragraph 6.14.11 of the BLP states that, the Royal Borough will prepare a Building Height and Tall Buildings SPD. This will identify locations that present opportunities for tall buildings in the Royal Borough, together with site-specific</p>

		<p>recommendations on building height. It will provide additional detailed guidance on location, height and design of tall buildings and set application requirements for tall buildings. Clause 10 of Policy QP3a also states that further details and guidance on the application of the policy will be set out in a Building Height and Tall Buildings SPD.</p> <p>The SPD provides guidance, does not set new policy, and it does not allocate sites for development. As stated in paragraph 4.1.1 of the SPD, the ten key principles have been identified to guide the approach and design of tall buildings in the Royal Borough. Furthermore, paragraph 4.1.2 states that developers and designers should use the principles and contained guidelines to inform their approach to the location, layout and design of a tall building. Section 4 of the SPD provides the additional detailed guidance on the design of tall buildings required by the Borough Local Plan.</p> <p>The SPD is intended to ensure that any tall building applications that are permitted are of the highest possible quality. The SPD does not permit tall buildings or allocate sites for tall buildings. The intention of the SPD is to give the Council more control over what tall buildings are, or are not, permitted within the Borough.</p>
4.1	<p>The 10 Tall Building Principles, as drafted, are divorced from the precise wording and intent of policy QP3a. There is a risk that these principles become – in effect – new policy.</p>	<p>Paragraph 6.14.11 of the BLP states that, the Royal Borough will prepare a Building Height and Tall Buildings SPD. This will identify locations that present opportunities for tall buildings in the Royal Borough, together with site-specific recommendations on building height. It will provide additional detailed guidance on location, height and design of tall buildings and set application requirements for tall buildings. Clause 10 of Policy QP3a also states that further details and guidance on the application of the policy will be set out in a Building Height and Tall Buildings SPD.</p> <p>As stated in paragraph 4.1.1 of the SPD, the ten key principles have been identified to guide the approach and design of tall buildings in the Royal Borough. Furthermore, paragraph 4.1.2 states that developers and designers should use the principles and contained guidelines to inform their approach to</p>

		<p>the location, layout and design of a tall building.</p> <p>The key principles do not form new policy. The SPD provides guidance, it does not allocate sites for development, nor does it encourage the development of tall buildings.</p> <p>Any development proposal that includes tall buildings will need to take account of the policies of the BLP, national policies and be informed by the guidance included in the SPD and other relevant documents including the Borough Wide Design Guide.</p>
4.1	<p>Key Principles of the draft SPD are not compliant with the requirement for Biodiversity Net Gain (BNG) in accordance with national planning policy.</p> <p>Insufficient in achieving any net gain as the definition of green infrastructure is to 'protect biodiversity' rather than increase it.</p>	<p>Biodiversity requirements and biodiversity net gain are policy requirements in the Local Plan and, in relation to the 10% net gain, will be required on nearly all developments from 2024.</p> <p>Any development proposal that includes tall buildings will need to take account of the policies of the BLP, national policies and be informed by the guidance included in the SPD and other relevant documents including the Borough Wide Design Guide.</p>
4.2.2	<p>Inaccurate assessment of 'context height' in northern section of the site identified for 8 storey housing. Paragraph 3.3 of the Hydra report which provides a baseline study of the area is also incorrect. The correct information can be found in the 'Tall Buildings Technical and Baseline Study', dated October 2019, 7.2: Existing Building Heights. This identifies building heights are predominantly 2 storey, but in recent years some of the buildings nearest Shoppenhangers Road and on the lowest topographical levels have been raised to be 4 storeys.</p>	<p>This comment appears to refer to paragraph 4.2.2 of the South West Maidenhead Placemaking Area SPD, not the Building Heights and Tall Buildings SPD.</p> <p>Following public consultation, context heights in the Borough have been reassessed to make use of available digital data (Lidar based DTM and DSM data, and OS data), leading to more accurate results. The context heights identified in the SPD follow a robust methodology and are considered appropriate.</p>
	<p>Opposing view to the above submitted: Overall context height of 4 storeys is not reflective of the BLP allocation, specifically point 1(i) of the site allocation pro forma for AL13 which denotes that the northern</p>	<p>Following public consultation, context heights in the Borough have been reassessed to make use of available digital data (Lidar based DTM and DSM data, and OS data), leading to more accurate results. The context heights identified in the SPD follow a robust methodology and are considered appropriate.</p>

	neighbourhood should reflect the town centre's building heights, densities and typologies.	Any planning application received will need to carefully consider AOD. Paragraph 4.7.8 states that tall building proposals should be understood both in terms of their height above ground and their height above ordnance datum.
4.2.2	The SPD makes no reference to the topography of this northern part of the South West Maidenhead Placemaking Area (SWMPA). There are significant differences in ground levels such that an 8 storey building here would create an intrusion in to the skyline, be visible from miles around, weaken town image and detract from the quality of the area.	<p>This comment appears to refer to paragraph 4.2.2 of the South West Maidenhead Placemaking Area SPD, not the Building Heights and Tall Buildings SPD.</p> <p>Context heights in the SPD have been reviewed following the public consultation. Context heights have been amended where appropriate. The Council is satisfied that the findings of the review of the Borough's context heights are robust.</p> <p>Any planning application received will need to carefully consider AOD. Paragraph 4.7.8 states that tall building proposals should be understood both in terms of their height above ground and their height above ordnance datum.</p>
4.2 and 4.3	<p>Tall buildings of an appropriate scale, purpose and design could help revive Maidenhead's identity, character and prestige but their location and function should be part of co-ordinated master plan, like the forthcoming Town Centre SPD.</p> <p>Consideration should be given to a requirement for mixed usage in buildings over a certain height, not just at ground floor level but throughout the building. A tall building is more likely to be welcomed by the community if it houses facilities that they can use, e.g. a rooftop bar / restaurant.</p>	<p>The recommendations included within the SPD are on the form of development (height and scale), not on specific uses.</p> <p>However, paragraph 4.4.4 states that tall buildings should generally be mixed use buildings with active ground floors and offer a meaningful facility for the wider public, unless it can be demonstrated that active ground floor uses such as retail, leisure, cultural, community, health, employment are not viable in a location and the landmark is purely justified from a legibility point of view.</p>
4.3	Under section 4.3 Landscape Character and View of the draft SPD it describes the rural green leafy character of the SWMPA but does not mention views of this northern part of the site.	This comment appears to refer to paragraph 4.2.2 of the South West Maidenhead Placemaking Area SPD, not the Building Heights and Tall Buildings SPD.

4.3	Large parts of Sunninghill and Ascot Parish are not located in 'central areas' or within 800m of Ascot Station and are poorly served by public Transport.	<p>Paragraph 4.4.2 states that tall buildings should only be proposed in areas that benefit from good public transport accessibility and are well connected with a network of walking and cycling routes.</p> <p>Furthermore, Policy QP3a (7) of the BLP states that in general, tall buildings will only be considered appropriate in areas with high public transport accessibility, a mix of uses and an existing or emerging urban character that can successfully assimilate the scale, height and level of activities of the proposed development.</p> <p>This would be assessed as part of any planning application that was submitted.</p>
4.3	Should this paragraph refer to District Centres rather than local centres?	<p>Noted.</p> <p>Amend Section 4.4 to include reference to District Centres.</p>
4.6	<p>Existing tall building development in Maidenhead has not complied with guidance.</p> <p>Building height should not exceed existing town centre buildings.</p> <p>Existing residents were not consulted; presentations have been provided in the Nicholson centre but don't recall buildings exceeding existing heights.</p>	<p>The planning permissions for existing development in Maidenhead have already been granted. Those decisions were made according to the policy framework that was in place at the time of the decision.</p>
4.7	W5 and W7 fall within the protected views of Windsor Castle in the Windsor NP.	<p>In Table 5.1, the entries for both W5 and W7 state that there is no opportunity for tall buildings. In both areas, any proposed development should not exceed the AOD height of the Windsor and Eton Central Station building and avoid adverse impacts on incidental and longer views towards Windsor Castle.</p> <p>It should also be noted that any proposal for development must comply with Policy HE1 of the BLP which states that the historic environment will be conserved and enhanced in a manner appropriate to its significance.</p> <p>Policy HE2 of the BLP also states that development proposals should show how the development protects and enhances public view of the Castle, including those from further afield.</p>

4.7	W7 proposed building up to the riverbank of the Thames, is this the result if the poor quality maps/images?	Noted. Amend and all update maps to make more legible.
4.7.1	There are not two towns in the Borough but four – Maidenhead, Windsor, Ascot and Eton.	Noted. Amend text in paragraph 4.7.1
4.7.10	Typo – tal rather than tall	Noted. Amend text in paragraph 4.7.10
4.7.10	Maidenhead town centre is highlighted as the only place where a cluster of tall buildings may be found but there are other areas where such clusters may be found; for example Sawyers Close and the Fountain Roundabout in Windsor.	Noted. However, paragraph 4.7.10 states that the only place where the clustering of tall buildings <u>is found appropriate</u> in the Royal Borough is the town centre of Maidenhead. Figure 2.3 has a note relating to Sawyers Close, which has a unique context.
4.8	There is no reference to the fact that Rushington Copse is ancient woodland and as such is a sensitive area that requires environmental designation in the plan and therefore requires protection. It is entirely inappropriate to place tall buildings so close to ancient woodland with no mention of a buffer zone Section 4.8 should mention ancient woodland as a local wildlife site	The row for site M5 in Table 5.1 states that proposals should test the impact of tall buildings at South West Maidenhead on the landscape, including woodland amongst other things. Policy NR3 of the BLP ensures that any development proposals should ensure that Ancient Woodland will be maintained, protected and where suitable, enhanced. Ancient or veteran trees are to be safeguarded from harm or loss. The AL13 site proforma in the BLP requires that Rushington Copse be retained as part of any development proposal, including buffer zones around it. Any development proposal that includes tall buildings will need to take account of the policies of the BLP, national policies and be informed by the guidance included in the SPD and other relevant documents including the Borough Wide Design Guide and the South West Maidenhead SPD.
4.8	An 8-storey building in this location will be highly visible since the ground level is at 43m AOD and the general level at the bottom of the hill (station, Landing, Grenfell Park) are at 28m. That is a difference of 15m or 5 storey building.	Noted. Amend text (for M9 row in Table 5.1) to remove AOD height limitation and replace with need to test the impact of tall buildings in respect of landscape and visual impact, skyline impact and impact on long-distance views due to elevated nature of site.
4.8.4	Tall building design should also minimise the risk of bird strike in order to protect biodiversity	Noted. Amend Section 4.8 and paragraph 4.8.4 to include text that states that the design of tall buildings should minimise the risk of bird strike.

<p>4.8 and 4.11</p>	<p>With the exception of daylighting levels, which are to comply with BRE standards, there is no definition or guidance as to what constitutes ‘high quality’, ‘high levels of amenity’ or ‘high sustainability standards’; all referenced in the SPD.</p> <p>Although planning authorities cannot demand that new homes are assessed under the BRE’s Home Quality Mark surely this would be a way of proving to RBWM that high standards have been achieved at a level determined by a respected third party.</p>	<p>Noted. However, there is no simple way of defining these terms. Nevertheless, this SPD would sit alongside other SPDs such as the Borough Wide Design Guide and the forthcoming Sustainability SPD which provide further guidance on these matters.</p> <p>Paragraph 7.2.3 of the SPD does state that planning applications that include tall buildings will need to provide a sustainability statement which outlines how the building will apply best sustainable practices. A recognised method of sustainability assessment should be used e.g. BREEAM.</p>
<p>4.9.1</p>	<p>The only reference to topographies is in 4.9: Ground Condition. It would be more accurate to say the land slopes towards the M4 in relation to the SWMPA, but there is a steep drop in levels at the northern most part of the site which is on high ground and drops suddenly to Courtlands and the station. To put tall buildings on this prominent high ground will mean they will be visible for miles and tower over the town centre and neighbouring developments.</p>	<p>It seems that this response refers to paragraph 4.9.1 of the SWMPA SPD, not the Building Heights and Tall Buildings SPD.</p>
<p>4.11</p>	<p>Is the SPD implying that in terms of CO2 emissions in use the developer need only meet the <i>minimum</i> standards set by Part L of Building Regulations?</p>	<p>The SPD does not mention the Building Regulations in Section 4.</p> <p>As stated in paragraph 1.3.2, this SPD only covers aspects of tall buildings that are specific to RBWM. It does not provide guidance on matters already addressed by national Building Regulation requirements (e.g. access and fire safety, energy and water efficiency and disabled access).</p> <p>The SPD cannot introduce new policy and cannot provide guidance on matters already addressed by national Building Regulation requirements.</p> <p>More general guidance on reducing carbon emissions is being prepared through the Sustainability SPD.</p>

5. POTENTIAL LOCATIONS FOR INCREASED HEIGHT, LARGE AND TALL BUILDINGS		
Paragraph Number	Summary of Representation	Council Response
5.1	Re-write to include all Conservation Areas	<p>Eleven of the Conservations Areas not listed under paragraph 5.1.5 are located within the Green Belt and consequently would fall under the definition of an 'inappropriate area' identified at paragraph 5.1.6. It is therefore not necessary to list them under 'sensitive Conservation Areas' at paragraph 5.1.5. Castle Hill, Maidenhead and Maidenhead Town Centre are not listed as 'sensitive Conservation Areas' under paragraph 5.1.5.</p> <p>Figure 5.1: Character areas sensitivity assessment, at page 110 of the Royal Borough of Windsor and Maidenhead Tall Buildings Study, Tall Buildings Technical and Baseline Study (final report April 2022 – UPDATE), identifies Castle Hill Conservation Area as having a 'Medium' sensitivity to setting change arising from tall buildings, and Maidenhead Town Centre Conservation Area is identified as having a 'Low Medium' sensitivity. Nevertheless, in section 6.3 it states that proposals in relevant parts of Maidenhead Town Centre should test the impact of tall buildings on these two conservation areas.</p> <p>It is therefore not considered appropriate to include all Conservation Areas within the Royal Borough in the list at paragraph 5.1.5.</p>
5.1	<p>Unclear what the potential context height and maximum heights are or could be. This is arguably the most crucial item in the SPD, i.e. how tall can a tall building be?</p> <p>Suggested change: Re-draft table 5 with clear numbers in the columns as to the potential maximum heights and context heights, and not have the asterix (***) reference</p>	<p>Noted.</p> <p>The columns for table 5.1 will remain unchanged, however, the information can be simplified and clarified. Overall building heights remain in either storeys or metres as a maximum measurement, however, the descriptions have been made clearer.</p> <p>Amend Table 5.1 following public consultation. Remove the asterix references from Table 5.1 and replace with footnotes 1 to 5 (for clarity).</p>
5.1	The SPD has not grasped the particular sensitivities in Cookham and the use of and reference to 'future context height' in the SPD should be removed.	Noted. However, the SPD refers to " Potential future context height".

		<p>Amend Table 5.1 following public consultation. For the Cookham sites make it clear that there are no opportunities for tall buildings on the C1 and C2 sites.</p>
<p>Section 5.2 and Table 5.1</p>	<p>Guidance for AL13, M9 Chapter 5 and LM7 Chapter 6 should be reassessed for the following reasons:</p> <ul style="list-style-type: none"> - Overall context height of 4 storeys is not reflective of the BLP allocation; specifically point 1(i) of the site allocation proforma for AL13, which denotes that the northern neighbourhood should reflect the town centre's building heights, densities and typologies. - Potential future overall context height for peripheral areas is potentially seen as overly restrictive and would benefit from more clarity around what is meant by peripheral areas. 2/3 storeys may not allow the principle and flexibility to gradually step up from the adjacent context at the edges of the site. This guidance is not in full alignment with the fact that M9 is identified as a site for Potential Future Overall Context Height increase...We also do not consider that reflects AL13 proforma 1(ii). - A maximum of 8 storeys is overly restrictive at the northern access of AL13. It is not clear if this has been tested against the future context height within Maidenhead's town centre. The issue of storey heights should be expressed as a range to support more detailed design exploration. - The maximum 25m should be reassessed. This has the potential to be insufficient/not flexible enough to accommodate a non-residential ground floor, some construction methodologies or requirement for 	<p>Noted.</p> <p>Following public consultation, context heights in the Borough have been reassessed to make use of available digital data (Lidar based DTM and DSM data, and OS data), leading to more accurate results. The context heights identified in the SPD follow a robust methodology and are considered appropriate.</p> <p>Amend description of Principle 6.2 (g) for LM7 and within the table (5.1) to clarify context height.</p> <p>Any planning application received will need to carefully consider AOD. Paragraph 4.7.8 states that tall building proposals should be understood both in terms of their height above ground and their height above ordnance datum.</p> <p>The proposed context height for the LM7 site (Southwest Maidenhead) has been reviewed and text reference to AL13 added.</p> <p>M9 and SPD have been amended to clarify heights along the edges of the site. The SPD has also been amended to reflect the text of AL13 in the BLP, including 'Opportunity for Change' (in relation to Principle 6.2 (G)) which now states: 'Site allocation AL13 requires building heights, densities and typologies of the northern neighbourhood to reflect those in the town centre.'</p> <p>Whilst 'peripheral areas' has not been defined in the context of M9, text has been added to Principle 6.2 (G) to clarify 'heights towards the edges of the site mediate with the lower surrounding development', and 'Areas towards the edges of the site should be 2-3 storeys'.</p> <p>Establishing the maximum heights for tall buildings in LM7 is consistent with methodology adopted by this SPD (context height ratio and proportionality to place significance). Possible height in LM7 has been established using the</p>

	<p>rooftop plant. We would welcome the removal of this height request, or ask that flexibility is built into it.</p> <ul style="list-style-type: none"> - We disagree with the definition of maximum AOD height identified for M9. This level of detail is seen as overly prescriptive without more detailed testing. The maximum 8 storey building cannot be accommodated within the maximum 60m AOD height. - There are already extensive policy mechanisms in place to control the design of tall buildings... - The guidance is too prescriptive and does not allow for a flexible approach towards sustainable development. The height of the buildings is something that we would expect to be dealt with in the design process, where the focus should be on producing proposals of high quality design... - The SPD needs to remove references to specific heights and AOD height limits for Maidenhead Golf Course. 	<p>methodology adopted by this guidance and reviewed in a 3D model environment. The height guidance for LM7 reflects the elevated nature of the site and Principle 4.7 in the SPD. Height guidance does not stand in the way of detailed design exploration within the confines of this constraint.</p> <p>Maximum metric heights have been reviewed and amended in the SPD to reflect 3.2m regular floor height and 4.2m ground floor height.</p> <p>The 60m AOD height limitation has been removed from M8 in Table 5.1 and replaced with the need to test the impact of tall buildings in respect of landscape and visual impact, skyline impact and impact on long-distance views due to elevated nature of site.</p> <p>There are policy mechanisms in place to control the design of tall buildings. Policy QP3a of the BLP addresses the height of all new development, with specific urban design criteria for tall buildings and provides tall building urban design principles. However, policy QP3a also commits the Council to provide further details and guidance on the application of this policy to be set out in a Building Height and Tall Buildings SPD.</p> <p>The NPPF requires local planning authorities to provide clarity on development parameters (“Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable”. (Paragraph 127)). As mentioned above, the SPD is required as per Policy QP3a clause 10. Any development proposal that includes tall buildings will need to take account of the policies of the BLP, national policies and be informed by the guidance included in the SPD and other relevant documents including the Borough Wide Design Guide.</p>
Table 5.1	LM7 – a landmark building at this location is completely unnecessary for way-marking since the main entrance to the site is at the southern end and there will be no through	The potential for a Landmark building, LM7, is expressed as a gateway into the strategic expansion area of Maidenhead from the town centre. The South-West Maidenhead SPD identifies the ‘northern most neighbourhood should be orientated towards the town centre, given its proximity, and in doing so establish

	<p>traffic and only public transport and bicycles at the northern end.</p> <p>There is no mention of the mass of the building proposed but since it apparently needs some lower tall building around the landmark building to mitigate the harm it does, this will be a massive building cluster on a site which is about 150 metres square on high ground with two-storey residential housing on at least two sides.</p>	<p>a new town centre neighbourhood'. It is intended that the northern neighbourhood will be the primary sustainable movement corridor.</p> <p>This is a building height and tall buildings SPD, so its principal focus is on height. The massing of buildings and specifically tall buildings can have an impact on how the building is perceived and how well it responds to its context. Buildings that are slender and upward-striving generally tend to appear more elegant than buildings of greater mass or with a slab-like appearance. The massing of development will depend on proposed uses and appropriateness will need to be assessed as part of the development management process.</p> <p>Section 4.10 of SPD states that any tall buildings should be designed to express elegance, proportionality and verticality in a form that is consistent from every angle. To that end, generally, slab blocks and bulky forms should be avoided. In addition, Section 7.2 of the SPD also states that any planning application will need to include a Design and Access Statement that addresses scale and massing.</p>
5.1 – 5.3	<p>The key principles provide extremely limited protection from tall and larger buildings in the Parish of Ascot and Sunninghill other than to green belt and highly sensitive heritage areas and will fail to prevent proposals for large and tall buildings across the Parish.</p>	<p>Any development proposal that includes tall buildings will need to take account of the policies of the BLP, national policies and be informed by the guidance included in the SPD and other relevant documents including the Borough Wide Design Guide.</p> <p>The SPD is intended to ensure that any tall building applications that are permitted are of the highest possible quality. The SPD does not permit tall buildings or allocate sites for tall buildings. The intention of the SPD is to give the Council more control over what tall buildings are, or are not, permitted within the Borough.</p>
Table 5.1	<p>The recommendations for the Cookham Station Node area in the SPD run counter to the Borough's own position in respect of development in this location (see 20/00864/FULL and 21/02331/OUT). The SPD should be amended to reflect this: that the sensitivity of the area</p>	<p>Following public consultation, context heights in the Borough have been reassessed to make use of available digital data (Lidar based DTM and DSM data, and OS data), leading to more accurate results. The context heights identified in the SPD follow a robust methodology and are considered appropriate.</p>

	<p>should be fully recognised and identified as being inappropriate for tall buildings.</p>	<p>The SPD clearly states that the maximum height of any large building in Cookham (C1 and C2 in Table 5.1) should be a maximum of 3 storeys.</p> <p>Amend text in Table 5.1 to clarify that there is no opportunity for a tall building on any of the sites in Cookham.</p> <p>Any proposal for development will need to take account of the policies of the BLP, national policies and the guidance included in the SPD and other relevant documents. Any planning application received in Cookham would also need to take account the Cookham Village Design Statement.</p>
Table 5.1 Codes C1 and C2	<p>Suggests there are no applicable townscape or heritage assessment criteria for tall buildings in these locations, despite Table 5.1 of the baseline study stating that The Cookham High Street CA is highly sensitive to tall buildings. Any future development in C1 would be in the setting of the CA and is therefore highly sensitive and in C2 would be subject to wider consideration of the impact on the Spencer landscape.</p>	<p>Principle 4.4 of the SPD states that tall buildings must demonstrate that they will minimise or avoid harm to designated heritage assets and their settings. Proposals must comprehensively review and test their impact on heritage assets, even where they are located further away. Similarly, proposals for a tall building will need to demonstrate that it minimises or avoids adverse impacts to protected and valued landscapes and their characteristics.</p> <p>The SPD clearly states that the maximum height of any large building in Cookham (C1 and C2 in Table 5.1) should be a maximum of 3 storeys.</p> <p>Amend text in Table 5.1 to clarify that there is no opportunity for a tall building on any of the sites in Cookham.</p> <p>Any proposal for development will need to take account of the policies of the BLP, national policies and the guidance included in the SPD and other relevant documents. Any planning application received in Cookham would also need to take account the Cookham Village Design Statement.</p>
C2	<p>Replace “Cannondale Road” with “Cannondown Road”</p>	<p>Subsequent to the post-consultation review of the SPD, the text relating to Cannondown Road has been removed.</p> <p>Amend C2 for accuracy.</p>

C2	<p>The suggestion that potential exists for a larger building “to emphasise the site entrance on Cannondale Road” would undermine the criteria in the BLP Site Proforma for allocation AL37, in particular points 3 and 9.</p> <p>This suggestion is also contrary to the Cannondown Road masterplan, which has been subject to public engagement, and which indicates that buildings are to be set back from Cannondown Road frontage, retaining a green landscaped aspect at the entrance to Cookham Rise, and two-storey in height. The masterplan is the appropriate place for analysis of the site and preparation of a place-specific development response. Reference to the site should therefore be removed from the SPD.</p>	<p>Following public consultation, context heights in the Borough have been reassessed to make use of available digital data (Lidar based DTM and DSM data, and OS data), leading to more accurate results. The context heights identified in the SPD follow a robust methodology and are considered appropriate.</p> <p>There is no opportunity for a tall building on this site. Upon review of the site and site allocation AL37, the recommendations for the site have been changed. Potential future context height has been removed as has the previously stated opportunity for a large building.</p> <p>The SPD clearly states that the maximum height of any large building in Cookham (C1 and C2 in Table 5.1) should be a maximum of 3 storeys.</p> <p>Amend text in Table 5.1 to clarify that there is no opportunity for a tall building on any of the sites in Cookham, including C2.</p>
Table 5.1	<p>Emerging policy for Area W7 does not allow flexibility to create local landmarks that are greater than 1.5x contextual height. Question this approach given the proximity to the station and approaches to town centre. Suggest wording is revised to offer greater degree of flexibility – for example guiding built scale within public views but giving scope to set-back higher development away from public views within development plots. Suggest the parcel of W7 south of the railway viaduct has potential for tall building, subject to being supported by the necessary impact assessments.</p>	<p>Following public consultation, context heights in the Borough have been reassessed to make use of available digital data (Lidar based DTM and DSM data, and OS data), leading to more accurate results. The context heights identified in the SPD follow a robust methodology and are considered appropriate.</p> <p>The part of W7 that is covered by the increased context height of 6 storeys (focused on Windsor Yard) is also considered to not be suitable for a large building, as any rise above the already significant development height would become notable on the skyline. This has been clarified under W7.</p> <p>Following a review of all maps within the SPD, Parcel W7 has been amended to exclude Alexandra Gardens (designated open space). Windsor's skyline is highly sensitive to tall buildings as they would compete with and detract from Windsor Castle which should remain the dominant skyline feature in views of the town. Due to its proximity to the town centre and castle, W7 is not appropriate for tall buildings.</p>

		Amend Figure 5.4 for accuracy.
Figure 5.1	The whole of central Windsor area is shaded in grey which, according to the colour key, is a Sensitive area. This is incorrect as the area shaded grey in this Figure comprises at least 3 inappropriate areas as listed in the draft SPD under 5.1.4	The grey areas on Figure 5.2 are settlement areas without assessment of sensitivity. Amend all maps to include additional detail; a legend/key for the additional layers of information has been included for clarity. The previously grey shaded areas on Figure 5.2, denoting the settlement areas (omitting any assessment of sensitivity), have been replaced and the coloured green and blue outlines replaced with a different coloured-wash layer to denote when a location is 'sensitive' or 'inappropriate' (for example due to green belt, heritage or flood risk reasons).
5.1.2	As the consultation document is an SPD it seems incorrect to have to refer to another documents for details / interpretation (referred to Technical and Baseline Study) Does the baseline document require commenting on as well? Should the consultation have been named differently to reflect the correct extent of the consultation? Is the study referred to adopted as an integral part of the SPD? Is it the intention the whole study has to be read in order to interpret the SPD after adoption?	The SPD makes use of specialist information already carried out during the production of the Borough Local Plan and supplements the policy that the evidence has been prepared to justify (QP3a). Paragraph's 1.1.1 and 1.1.2 of the Technical and Baseline Study explains that the study formed part of the evidence base for the Borough Local Plan 2013-2033, which was adopted on 8 th February 2022. Reference is made to the Technical and Baseline Study in the SPD to highlight where it is drawing upon this evidence base to inform the SPD. The Council believe that the scope of the consultation was appropriate as all documents were included in the consultation.
5.1.3	Is this definition of heritage assets correct. The precise NPPF needs to be included here in the SPD.	The following definition is included in the NPPF Annex 2: Glossary <i>Designated heritage asset: A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation</i> <i>Heritage asset: A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).</i>

		Paragraph 5.1.3 is consistent with the NPPF definition, with the exception of the replacement of <i>'It includes...'</i> with <i>'Heritage asset includes..'</i>
5.1.3, 5.1.4 and 5.1.8	Policy NP/DG4 of the Ascot, Sunninghill and Sunningdale Neighbourhood Plan lists landmark buildings and views for protection. As the Neighbourhood Plan forms part of the Local Plan they should be added to the list of inappropriate and sensitive areas in 5.1.4 and 5.1.8 as they are 'designated heritage assets' in accordance with 5.1.3. Most of the Townscape Character Areas within the Parish have a very coherent and strong domestic scale character and should be defined as 'inappropriate areas' for tall buildings.	This area had been identified as sensitive townscape area in the baseline study. This had erroneously been omitted in Diagram 5.1 of the SPD. The diagram has been updated to include sensitive areas. Notwithstanding this, the site has not been identified as having an opportunity for a tall or large buildings in Section 5.
Figure 5.1 and Figure 5.4	The area of Windsor Yards fronting onto Charles Street and Goswell Hill should lie within the Sensitive Area policy zone. It is not justified to include within the inappropriate areas as it is outside of the Conservation Area and existing buildings east of Charles Street are already characterised as having larger building mass and height yet have limited impact on the Historic Core of the town centre.	Windsor Yards is included in the Windsor Town Centre Conservation Area and as such is of high sensitivity and inappropriate for tall buildings. Amend Figure 5.4 for accuracy.
5.1.6	This paragraph states Inappropriate Areas include Green Belt as development here is not acceptable as a matter of principle. This does not comply with the NPPF of policy QP5 of the BLP. It must be made clear in the SPD that development may be considered acceptable in the Green Belt subject to meeting the various exceptions set out in National Policy.	Amend text at paragraphs 5.1.4 to 5.1.6. The text will no longer state that the principle of tall buildings is unacceptable in the green belt / inappropriate areas. However, the revised paragraph 5.1.6 continues to highlight that it is likely that a tall building would be considered inappropriate development in the green belt, for the avoidance of doubt. Paragraph 5.1.6. also highlights such proposals would be assessed against policy QP5 of the BLP and the NPPF.
5.2	The term 'increased height building' is introduced. It is unclear how this is defined and where it fits in relation to contextual height.	Section 5 of the SPD covers potential locations for increased height, large and tall buildings and Section 5.2 specifically providing location guidance on increased height, large and tall buildings. These Sections do not reference 'increased height building', but rather, the explanatory text clarifies 'Development for generally increased context height, large buildings and tall buildings'. The title

		<p>‘increased height, large and tall buildings’ is therefore to be read as short hand for ‘increased context height, large buildings and tall buildings’.</p> <p>For example, Principle 6.2 I) Industrial Area, under the heading ‘Opportunity for Change’, states: ‘...<i>opportunity to intensify the industrial estate with buildings of increased height to make better use of available land.</i>’ However, this is not introducing a new term ‘increased height building’, but rather, once more, highlights the context area could be increased to support the intensification with employment use.</p>
5.2	<p>Heights for central Maidenhead – given height recommendations within this area (up to 40m LM1, 60m LM2, 31m LM4, and 25m LM7) extensive testing of intervisibility with heritage assets – in line with Historic England HEAN4 – will be required to understand the likely interaction with their setting and significance.</p> <p>The recommendations seem to have been ignored by the new 88m tall tower being built in central Maidenhead. The policy must be quite clear and robust, no development should be able to go above the 31m for LM4 anywhere in the town centre.</p>	<p>Following public consultation, context heights in the Borough have been reassessed to make use of available digital data (Lidar based DTM and DSM data, and OS data), leading to more accurate results. The context heights identified in the SPD follow a robust methodology and are considered appropriate.</p> <p>In addition, in response to the large number of comments received relating to Section 6 of the SPD and Maidenhead, additional View Impact Testing analysis was carried out following the consultation on specific sites within the town centre. The assessment utilises view testing to assess the potential appropriateness of heights at two sites in respect of their impact on visual and townscape aspects.</p> <p>The planning permissions for existing development in Maidenhead have already been granted. Those decisions were made according to the policy framework that was in place at the time of the decision.</p> <p>Every planning application received in future by the Council will be assessed on its merits and will need to take account of the policies of the BLP, national policies and be informed by the guidance included in the SPD and other relevant documents including the Borough Wide Design Guide.</p>
5.2	<p>Agreed with the general need to identify appropriate locations for increased height and tall buildings across the entire Borough. However, the SPD does not identify the</p>	<p>The planning permissions that have already been granted were made according to the policy framework that was in place at the time of the decision.</p>

	<p>site at Bray studios as a suitable location despite planning permission being granted for a new film and TV studio with a maximum height of 17.5m. Figure 5.2 should be amended accordingly.</p>	<p>Paragraph 2.1.4 explains that the SPD has mapped the prevailing broad context height of the Royal Borough using the latest available datasets, which is represented in Figures 2.1-2.6 of the document.</p> <p>In addition, paragraph 2.1.5 explains that the context height is the height that an observer would read as the typical or defining height of a particular area. In places that are consistent in height, the context height may be the most commonly occurring building height. In more varied height environments, the context height may be the average height that buildings fluctuate around.</p> <p>Following public consultation, context heights in the Borough have been reassessed to make use of available digital data (Lidar based DTM and DSM data, and OS data), leading to more accurate results. The context heights identified in the SPD follow a robust methodology and are considered appropriate.</p>
5.2	<p>The draft SPD seeks to provide guidance on large/larger buildings that are not Tall Buildings (as defined). This is completely inappropriate and all references to large/larger buildings needs to be deleted. Large/larger buildings are not subject to Policy QP3a and are outside the scope of the proposed SPD.</p>	<p>The SPD is not considered to introduce new policy by providing limited guidance on assessing large buildings. The use of the term is intended to provide a way of describing buildings that are taller than the surrounding context height but are not tall enough to be considered a tall building.</p> <p>Paragraph 3.2.12 of the SPD makes clear that large buildings are not considered to be tall buildings. Paragraph 3.2.13 and Principle 3.1 both state that large buildings usually require less stringent testing compared to tall buildings but should still be carefully located and designed.</p>
Figure 5.4 and Table 5.1	<p>The standards for W7 Windsor Town Centre are relative to smaller residential storey heights rather than commercial floor to ceiling heights and is therefore too restrictive on commercial and mixed-use development in this zone. Does not give enough flexibility for the intensification of uses to support the vitality of the Town Centre in these locations (as Principle 4.4 states in the SPG).</p>	<p>Paragraph 2.1.4 explains that the SPD has mapped the prevailing broad context height of the Royal Borough using the latest available datasets, which is represented in Figures 2.1-2.6 of the document.</p> <p>Paragraph 2.1.8 has been amended to state that “In reality, the exact height of a storey will vary from building to building and will typically be higher 3.2m in commercial buildings” rather than 3m.</p>

		Table 5.1 explains that there is considered to be no opportunity for tall buildings as Windsor town centre comprises and is situated within multiple highly sensitive heritage contexts, including Windsor Castle, whose settings would be significantly harmed by a tall building.
Figure 5.4 and Table 5.1	The parcel of land drawn for W7 should not extend across Alexandra Gardens to the river; this is an Inappropriate Area and important green space for the town. This area of townscape is incredibly varied and the SPG would benefit from further refinement of detail shown on the mapping.	Noted. Amend Figure 5.4 for accuracy. In addition to the parcel of land not extending across Alexander Gardens to the river, the map has also been updated with additional layers of information.
Table 5.1 and Figure 5.4 W1	AL21 has a narrow site entrance. A larger building at the site entrance would be impractical. This anomaly demonstrates that the Tall Buildings SPD has been developed in isolation.	In this instance, the SPD has identified the potential for a larger building with a maximum of 3 storeys. This potential is identified to either 'emphasise' the site entrance, or for central node within the site. Every planning application received by the Council will be assessed on its merits and will need to take account of the policies of the BLP, national policies and be informed by the guidance included in the SPD and other relevant documents including the Borough Wide Design Guide.
W2	This is the one site that may be identified as a suitable site.	Noted.
W3	A large, tall building in the area would be wholly inappropriate and detrimental to the amenity of existing residents in an area of mainly two-storey houses.	Context heights in the SPD have been reviewed following the public consultation. Context heights have been amended where appropriate, and in this instance the potential for a building with a maximum of 4 storeys is identified. The Council is satisfied that the findings of the review of the Borough's context heights are robust. Paragraph 2.1.4 explains that the SPD has mapped the prevailing broad context height of the Royal Borough using the latest available datasets, which is represented in Figures 2.1-2.6 of the document. Section 5 of the SPD also provides clear, specific guidance on what may or may not be appropriate in specific locations across the Borough. Section 6 does the

		same for the sites in Maidenhead Town Centre, with maps and tables clearly stating the findings and recommendations of the SPD.
W4	A large, tall building in the area would be wholly inappropriate and detrimental to the amenity of existing residents in an area of mainly bungalows and two-storey houses	<p>Context heights in the SPD have been reviewed following the public consultation. Context heights have been amended where appropriate, and in this instance the potential for a building with a maximum of 3 storeys is identified. The Council is satisfied that the findings of the review of the Borough's context heights are robust.</p> <p>Paragraph 2.1.4 explains that the SPD has mapped the prevailing broad context height of the Royal Borough using the latest available datasets, which is represented in Figures 2.1-2.6 of the document.</p> <p>Section 5 of the SPD also provides clear, specific guidance on what may or may not be appropriate in specific locations across the Borough. Section 6 does the same for the sites in Maidenhead Town Centre, with maps and tables clearly stating the findings and recommendations of the SPD.</p>
W5	<p>Surprising to find that location W5 incorporates the listed railway arches. Unless this is another emanation of the poor quality of figures?</p> <p>Large buildings on W5 and W7 would obscure the local views from Duke Street towards Windsor Castle that are in the adopted Windsor Neighbourhood Plan</p>	<p>Protecting and enhancing the Borough's heritage assets, protected landscapes and their settings is one of the key principles within the SPD.</p> <p>Any proposal for a tall building will need to take account of the policies of the BLP, national policies and be informed by the guidance included in the SPD and other relevant documents including the Borough Wide Design Guide and Neighbourhood Plans.</p>
W8	<p>The area to the front of the grade II listed hospital and statue is inappropriate to consider for redevelopment</p> <p>Please note the Leopards Road address is incorrect</p>	<p>Noted.</p> <p>Amend SPD to correct the reference to Leopards Road.</p>
5.5	Demonstrates how neglected Maidenhead is with regards to parks and gardens which means that Maidenhead cannot meet biodiversity nor climate change targets as set out by the Borough.	Noted.

6. MAIDENHEAD HEIGHTS AND TALL BUILDING STRATEGY		
Paragraph Number	Summary of Representation	Council Response
General	In recent years Maidenhead Town Centre has become home to roosting Peregrines on the BT Tower and St Lukes Church. It would be wonderful to encourage these birds and I would like to see design guidance included to encourage developers to incorporate a nesting platform to their designs	Principle 6.2 (B) and (C) have been updated to reflect that peregrines have been observed roosting in parts of the town centre, and that development of tall buildings should consider the habitat of these birds and include measures that support the continued roosting and nesting in the future.
General	This section is overly prescriptive in terms of context heights and determining locations for tall buildings	<p>Paragraph 6.14.11 of the BLP states that, the Royal Borough will prepare a Building Height and Tall Buildings SPD. This will identify locations that present opportunities for tall buildings in the Royal Borough, together with site-specific recommendations on building height. It will provide additional detailed guidance on location, height and design of tall buildings and set application requirements for tall buildings. Clause 10 of Policy QP3a also states that further details and guidance on the application of the policy will be set out in a Building Height and Tall Buildings SPD.</p> <p>Section 6 provides clarity on height parameters for tall buildings in Maidenhead which is consistent with the methodology adopted by this SPD and responds to requirements by NPPF (para 127.) on providing clarity. Section 4 provides design principles but not area specific location principles, and both are needed to appropriately guide tall buildings.</p> <p>The SPD is intended to ensure that any tall building applications that are permitted are of the highest possible quality. The SPD does not permit tall buildings or allocate sites for tall buildings. The intention of the SPD is to give the Council more control over what tall buildings are, or are not, permitted within the Borough. Likewise, any planning application received by the Council will be assessed on its individual merits.</p>
Figure 6.1	South West Maidenhead area is not part of the town centre	The site proforma for allocation site AL13 in the BLP states that the northern neighbourhood will be orientated towards the town centre making the most of proximity to the railway station and town centre facilities. Here, building heights,

		densities and typologies will reflect those in the town centre and will promote patterns of living which reduce reliance on the car. As such, the Southwest Maidenhead site (LM7) has been identified by the SPD as being a Maidenhead town centre character area.
Figure 6.2	<p>The approach to context height in this figure is overly cautious and not reflective of the situation along West Street.</p> <p>This throws up an anomaly between QP3a (2) and QP3a(4) – where any 5 storey building would be considered a tall building despite also needing to be over 1.5x context height. (An example being the 6-storey permission at 106 to 108 High Street – 19/03606 – which would fall between definitions).</p> <p>If the SPD acknowledges that buildings over 5 storeys would be acceptable if they met the principles in Section 4 then this would provide more clarity and enable scheme like this to come forward.</p>	<p>In the consultation draft Figure 6.2 showed the buildings in West Street, fronting the High Street, were identified as being located in Area C (3 storeys). The buildings fronting West Street were identified as being in Area E (5 storeys). Principle 6.2 (C) identified an opportunity for a local landmark (LM4) at West Street (north side).</p> <p>Context heights in the SPD have been reviewed following the public consultation. Context heights have been amended where appropriate.</p> <p>Figure 6.2 now identifies the buildings in West Street, fronting the High Street, as being in Area D (4 storeys). The buildings fronting West Street remain in Area E (5 storeys). The identification of a Landmark building (LM4) on the north side of West Street remains.</p> <p>The Council is satisfied that the findings of the review of the Borough’s context heights are robust.</p> <p>Every planning application received by the Council will be assessed on its merits and will need to take account of the policies of the BLP, national policies and be informed by the guidance included in the SPD and other relevant documents including the Borough Wide Design Guide.</p>
6.3	<p>There is strong implication that the sites identified in Figure 6.3 are the only locations where tall buildings will be allowed. This would seem to preclude buildings which are only 6 or 7 storeys outside of these specific locations. This brings the SPD in conflict with the BLP</p> <p>SPD should include text to clarify that the locations shown in Figure 6.3 are not exhaustive or definitive.</p>	<p>The SPD is intended to ensure that any tall building applications that are permitted are of the highest possible quality. The SPD does not permit tall buildings or allocate sites for tall buildings. Figure 6.3 provides recommendations within the context of Maidenhead town centre.</p> <p>The intention of the SPD is to give the Council more control over what tall buildings are, or are not, permitted within the Borough. Likewise, any planning application received by the Council will be assessed on its individual merits.</p>
6.4	<p>LM3 is shown almost adjacent to a 6-storey building but is defined as being no more than 6 storeys, this is not a</p>	<p>The review of the Context Heights on the High Street has classified this area as mainly 4 storey context height.</p>

	landmark building given the context height has already been permitted.	The SPD recommends that a local landmark of no more than 6 residential storeys would be appropriate subject to heritage impact and landscape and visual impact assessments;
Chapter 6 and Figure 6.5	Impacts adversely on the image and 'home counties' nature and character of the town centre which is already blighted by so many new flats that are not of high-quality design	<p>Noted.</p> <p>Every planning application received by the Council will be assessed on its merits and will need to take account of the policies of the BLP, national policies and be informed by the guidance included in the SPD and other relevant documents including the Borough Wide Design Guide.</p> <p>The Royal Borough of Windsor and Maidenhead is committed to ensuring that any proposed tall buildings are beneficial to the Royal Borough's towns and villages, and that they are in appropriate locations and achieve design excellence. That is the main purpose of this SPD.</p>
Chapter 6 and Figure 6.5	<p>The research/strategy document alludes to lack of sociability for residents of buildings above 5 storeys so why would you building something so tall in a small-town centre.</p> <p>Health and Safety aspects of such tall buildings to be considered</p>	<p>Noted.</p> <p>This reference was not included by way of suggesting that there is no place for tall buildings as a form of development. Rather, the reference was made as part of the wider summary of the theoretical framework for tall buildings that underpins the whole study.</p> <p>Paragraph 3.3.2 of the Building Height and Tall Buildings Technical and Baseline Study also explains that the context height of buildings in an area is an essential attribute that determines key characteristics of urban areas, such as their density, character, street enclosure, the quality of the public realm, and the sociability of urban spaces.</p> <p>The Royal Borough of Windsor and Maidenhead is committed to ensuring that any proposed tall buildings are beneficial to the Royal Borough's towns and villages, and that they are in appropriate locations and achieve design excellence. That is the main purpose of this SPD.</p>

Chapter 6 and Figure 6.5	The SPD and research/strategy documents do not consider the new WFH/Hybrid working patterns now popular post Covid, i.e. there will not be as many commuters. On the other side will Maidenhead become a 'commuter town', i.e. lacking in depth and the green / rural spaces people think they are moving to	Noted. It is beyond the scope of this SPD to consider working patterns. The SPD provides guidance on building height and tall buildings, it does not allocate sites for development, or encourage the development of tall buildings.
Chapter 6 and Figure 6.5	Document refers to an apparent abundance of leisure, retail and parking facilities – there are already inadequate for such an affluent town. Massive overdevelopment and a lack of infrastructure will only serve to make Maidenhead more of a ghost town.	The SPD is intended to ensure that any tall building applications that are permitted are of the highest possible quality. The SPD does not permit tall buildings or allocate sites for tall buildings. The intention of the SPD is to give the Council more control over what tall buildings is, or are not, permitted within the Borough. Likewise, any planning application received by the Council will be assessed on its individual merits.
LM2	Town Centre Core – The Civic Society shares the view that a 13 storey maximum height for Maidenhead would be more appropriate. However, 17 storeys have been approved for the Landing and 25 as part of the Nicholson's redevelopment. The SPD guidance should ensure that the same mistakes are not made again, it cannot undo the permissions already granted. The SPD should avoid setting a precedent and remove references to specific heights for unrealised proposals.	The planning permissions that have already been granted were made according to the policy framework that was in place at the time of the decision. The SPD cannot change historic planning permissions. Following public consultation, context heights in the Borough have been reassessed to make use of available digital data (Lidar based DTM and DSM data, and OS data), leading to more accurate results. As part of this review Maidenhead Town Centre View Impact Testing has been carried out, and is included at Appendix A. The findings of the further height testing are set out in the report at Appendix A and the conclusions have informed revisions to the guidance in the draft SPD. The outcomes of the testing are that a building between 8 and 10 residential storeys is considered appropriate on the LM1 site, and for LM2 the building should not be above the height of 52m (16 residential storeys). The Council is satisfied that the findings of the review of the Borough's context heights are robust.

<p>6.3 (LM7 and M8 in table 5.1)</p>	<p>The golf course is 43m AOD, 15m above the station. Topographical offset provision should be used to limit any development on this area to no more than 5 storeys, and ideally 3 to maintain contextual heights</p> <p>The northern part of the golf course is also not in the town centre</p> <p>The South West Maidenhead area is the gateway to the town and must not be turned in to some sort of urban ghetto</p>	<p>Noted.</p> <p>The site proforma for allocation site AL13 in the BLP states that the northern neighbourhood will be orientated towards the town centre making the most of proximity to the railway station and town centre facilities. Here, building heights, densities and typologies will reflect those in the town centre and will promote patterns of living which reduce reliance on the car. As such, the Southwest Maidenhead site (LM7) has been identified by the SPD as being a Maidenhead town centre character area.</p> <p>Context heights in the town centre range from 3 to 5 storeys. The recommended maximum height of LM7 of 8 storeys has been defined in respect of the envisaged future average context height in the centre of the northern neighbourhood of 5 storeys (range 4-6 storeys). LM7 has been assessed at 1.6x the envisaged future context height.</p>
<p>Figure 6.7</p>	<p>The approach to Town Centre East is not justified. The context heights as shown are incorrect. Page 69 is also incorrect; this is a key view of the town centre for people arriving by train. There is a clear townscape rationale for tall buildings in this location, which is acknowledged by the permissions already granted here.</p>	<p>Noted.</p> <p>The SPD has been amended and text added to clarify that buildings up to 7 storeys (large buildings) may be appropriate here, as part of a range of heights (3-7 storeys), whilst the area is not considered to merit buildings of greater height due to its peripheral location in the town centre.</p>

<p>7. APPLICATION REQUIREMENTS</p>		
<p>Paragraph Number</p>	<p>Summary of Representation</p>	<p>Council Response</p>
<p>7.2</p>	<p>A Biodiversity Statement should be incorporated to explain exactly how net gain will be achieved, e.g. green walls, green roofs, Peregrine Platforms, Swift boxes or bricks, Bat boxes, insect habitats and design features to avoid bird strike.</p> <p>Green roofs on tall buildings support biodiversity including providing opportunities for birds to nest</p>	<p>Noted.</p> <p>Biodiversity requirements and biodiversity net gain are policy requirements in the Local Plan and, in relation to the 10% net gain, will become a mandatory requirement in 2024.</p>

		Any development proposal that includes tall buildings will need to take account of the policies of the BLP, national policies and be informed by the guidance included in the SPD and other relevant documents including the Borough Wide Design Guide.
7.2.2	Concerns regarding the requirement that any application for a building which is more than 1.5 times taller than the surrounding context, would only be supported if applied for under a full planning application. It is considered that this requirement at 7.2.2 should be deleted in its entirety.	Noted. The SPD has been amended and this paragraph has been removed.

Draft Building Height and Tall Building Technical and Baseline Study		
Paragraph Number	Summary of Representation	Council Response
Figures 4.8 – 4.11 and 4.14 – 4.16 and 4.19 – 4.21	The SPD is an overtly urban strategy. The analysis plans in the Baseline Study are focussed on the main settlements of Maidenhead, Windsor and Ascot.	The parts of the Borough that are not built up are within the Green Belt. The SPD states that it is likely that a tall building would be considered inappropriate development in the Green Belt. Any development proposal within the Green Belt would need to be assessed against BLP policy QP5 and the relevant policies within the NPPF. Figure 4.22 shows the building heights in the Borough and surrounding area, which helps place context for focus on the main settlements of Maidenhead, Windsor and Ascot.

Draft Building Height and Tall Building Strategy		
Paragraph Number	Summary of Representation	Council Response
General	The Tall Building Strategy was initially prepared to support the draft BLP, and it is the NPPF that sets the scene for this document. The adopted BLP (not the NPPF) should set the	The SPD supplements the BLP policy and as such draws upon the evidence provided to justify the policy itself. The Tall building strategy was updated in

	scene for the draft SPD. A full reappraisal of the Tall Building Strategy is required, not a simple 'updating'.	<p>April 2022 to reflect the RBWM adopted Local Plan. The draft SPD references the relevant policy from the BLP and is consistent with it.</p> <p>Any development proposal that includes tall buildings will need to take account of the policies of the BLP, national policies and be informed by the guidance included in the SPD and other relevant documents including the Borough Wide Design Guide.</p>
General	The Tall Buildings Strategy document seems confused about its purpose. The title is 'strategy', yet the text refers to it being a 'study'. It cannot be both	<p>Noted.</p> <p>The Royal Borough of Windsor and Maidenhead Tall Buildings Study formed part of the evidence base for the Borough Local Plan 2013- 2033, which was adopted on 8th February 2022. The 'study' comprises two documents:</p> <ul style="list-style-type: none"> - Tall Buildings Strategy; and - Tall Buildings Technical and Baseline Study <p>The Tall Buildings Strategy presents a succinct strategy with only the necessary information included.</p> <p>The Tall Buildings Technical and Baseline Study is a separate report that demonstrates all the background work undertaken to create the strategy. Consequently, the strategy report forms part of the wider Tall Building Study.</p>
General	The document cannot legally be a strategy document. The strategic direction of the SPD is determined by the new BLP which was the subject of public examination, not a consultant report.	<p>Noted.</p> <p>Paragraph 1.5.11 states that BLP Policy QP3a was informed by the Tall Building Study and Strategy. Both documents were included within the evidence base of the BLP and have informed the SPD. The requirement for the SPD was established when the BLP was adopted, as Policy QP3a (10) which states that further details and guidance on the application of this policy will be set out in a Building Height and Tall Buildings SPD.</p>
General	The Tall Building Strategy was initially prepared for RBWM to support the draft BLP and therefore pre-dates the decisions made by the Inspector during the course of the examination and the significant changes to the policy regarding tall buildings.	<p>Noted.</p> <p>Paragraph 1.5.11 states that BLP Policy QP3a was informed by the Tall Building Study and Strategy. Both documents were included within the evidence base of the BLP and the BLP Inspector would have been aware of them. They have informed the SPD. The requirement for the SPD was established when the BLP was adopted, as Policy QP3a (10) which states that further details and guidance</p>

		on the application of this policy will be set out in a Building Height and Tall Buildings SPD. The Strategy has been updated in April 2022 to reflect the Borough Local Plan. The draft SPD references the relevant policy from the BLP.
Section 4	Provides a better explanation of what the term context height means and how it should be used, with practical examples. Why are these points not included in the SPD.	<p>The SPD sets out the definition of the term context height that is within Policy QP3a of the BLP. Para. 2.1.5 provides further clarification on this term and this is considered to be clear.</p> <p>The Building Height and Tall Buildings SPD is more than just a Tall Building Strategy and consequently, cannot include all of the detailed analysis and explanation included within the Strategy document.</p>
Section 9	Do not agree with the proposals for permitting Landmark context height building in 'Gateway clusters & Town Centre' areas. Apart from radically changing the look and feel of neighbourhoods and the town centre, road, pedestrian, cycle, bus networks and parking provision are already under strain, as are water, sewerage, electricity, and gas services.	<p>Noted.</p> <p>Paragraph 7.2.4 highlights that the potential clustering and cumulative effects of tall buildings must be addressed in the supporting information submitted with an application.</p>