

**CONSOLIDATED LOCAL PLAN:  
DRAFT  
SELF ASSESSMENT OF POLICIES  
COMPARED TO THE NATIONAL  
PLANNING POLICY FRAMEWORK**

***November 2012***



planning advisory service

**Local Plans  
and the  
National Planning Policy Framework**

**Compatibility Self-Assessment Checklist**

This checklist which will help you assess the content of your new or emerging local plan<sup>1</sup> against requirements in the National Planning Policy Framework (NPPF) that are new or significantly different from national policy set out in PPGs and PPSs.

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**1A: Achieving sustainable development**

<b>The presumption in favour of sustainable development and core planning principles (para 6-17)</b>			
<b>What NPPF expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what NPPF expects</b>	<b>Does your local plan address this issue and meet the NPPF's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
<p><i>Policies in local plans should follow the approach of the presumption in favour of sustainable development and guide how it should be applied locally (15).</i></p>	<p><i>Does the plan positively seek opportunities to meet the development needs of the area?</i></p> <p><i>Does the plan meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, (subject to the caveats set out in para14)?</i></p>	<p>The NPPF (6) states that the purpose of the planning system is to contribute to the achievement of sustainable development and has an economic, social and environmental role (7).</p> <p>The Core Strategy has a positive "Spatial Vision" and "Strategic Objectives" which are reflected in the spatial strategy.</p> <p>None of the policies in the Core Strategy seek to limit the quantum of development that can take place.</p> <p>The Site Allocations Development Plan Document (DPD) has proactively identified key sites for comprehensive redevelopment which meet the specific needs of local communities.</p>	<p>There are no conflicts with the NPPF.</p>
		<p>All of Slough's strategic policies which deal with needs are set out in the Core Strategy. This was prepared upon an assessment of the needs at the time. It is also in compliance with the South East Plan.</p> <p>The Council is not carrying out a review of its plans and so it is not considered necessary to carry out a review of the underlying assumptions behind the strategic policies in the Core Strategy.</p> <p>The Council continues to monitor development and update its evidence base as required but it is not</p>	<p>The Slough Plans met the objectively assessed needs at the time that existed at the time that they were prepared and have sufficient flexibility to meet changes in circumstances. As a result they are compatible with the NPPF.</p>

considered necessary to carry out a complete review of development needs as part of this "Self Assessment" exercise.

Flexibility is built into the Core Strategy policies.

For example the housing allocation set out in Core Policy 3 (Housing Distribution) is expressed as a "minimum" and has been adjusted to take account of the increase in Slough's allocation in the South East Plan.

The Housing Trajectory shows that the Council is not treating this figure as a maximum in that it has already approved or allocated sites for a much higher number of dwellings.

In selected key locations Core Policy 1 (Spatial Strategy) allows for *"some relaxation of policies and standards where this can be justified by the overall environmental, social and economic benefits that will be provided to the wider community"*.

Those policies which are not positively framed, such as the protection of the Green Belt, are the type of policies which the Framework recognizes should either be restrictive (14) or should actively manage patterns of growth (17).

This is explained in more detail in the assessment of individual topics set out below.

*Do you have a policy or policies which reflect the principles of the presumption in favour of*

Because all of the plans that cover Slough pre-date the NPPF, none of them contain the recommended "model policy" which sets out the presumption in favour of sustainable development.

None of the plans contain the "model policy".

This is effectively a

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	<p><i>sustainable development? A <a href="#">model policy</a> is provided on the Planning Portal in the Local Plans section, as a suggestion (but this isn't prescriptive).</i></p>		<p>statement of intent that in applying policy the Council will work proactively with applicants to approve applications where possible. As a result it would be possible to adopt this statement of intent even though it is not currently part of the statutory development plan.</p>
<p><i>The NPPF sets out a set of 12 core land-use principles which should underpin plan-making (and decision-making) (17)</i></p>		<p>The core planning principles set out in the NPPF (17) include the requirement that planning should:</p> <ul style="list-style-type: none"> <li>• Be plan-led, empowering local people to shape their surroundings;</li> <li>• Proactively support sustainable economic development;</li> <li>• Secure high quality design and good amenity;</li> <li>• Take account of the different roles and character of different areas;</li> <li>• Protect the Green Belt;</li> <li>• Support the transition to a low carbon future</li> <li>• Conserve and enhance the natural environment and reduce pollution;</li> <li>• Encourage the use of brownfield land;</li> <li>• Promote mixed use developments;</li> <li>• Conserve heritage assets;</li> <li>• Make fullest possible use of public transport, walking and cycling, focus significant development in sustainable locations;</li> <li>• Improve health, social and cultural wellbeing.</li> </ul>	<p>There are no conflicts with the NPPF.</p>

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		<p>It is considered that the combination of the Core Strategy, Site Allocations DPD and the “saved” policies in the Local Plans implement these core planning principles.</p> <p>The extent to which individual policies comply with the NPPF is examined in the relevant sections below.</p>	
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**1B: Delivering sustainable development**

<b>1. Building a strong, competitive economy (paras 18-22)</b>			
<b>What NPPF expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what NPPF expects</b>	<b>Does your local plan address this issue and meet the NPPF’s expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
<p><i>Set out a clear economic vision for the area which positively and proactively encourages sustainable economic growth (21).</i></p>		<p>The NPPF (18) states that the Government is committed to securing economic growth in order to create jobs and prosperity.</p> <p>The Core Strategy Spatial Vision includes a number of economic elements. These include encouraging “...<i>the comprehensive redevelopment of parts of the town centre so that it can fulfill its role as a regional hub and maintain its position as an important regional shopping, employment and transport hub.</i>”</p>	<p>There are no conflicts with the NPPF.</p>
		<p>It also states that “<i>The existing business areas in Slough will have an important role in maintaining a thriving local economy and providing a range of jobs for an increasingly skilled workforce.</i>”</p> <p>The Strategic Vision and Objectives are reflected in Core Policy 5 (Employment) which promotes office development in the town centre and parts of Slough</p>	

	<p>Trading Estate, all other employment generating uses with the Existing Business Areas and major warehousing and distribution developments in the eastern part of the Borough.</p> <p>Detailed development control requirements are set out in Local Plan Policy EMP 2 (Criteria for Business Developments) and specific policies for the specific business areas are set out in Policies EMP6 to EMP8.</p> <p>The Site Allocations DPD has been proactive in meeting the development needs of business by identifying priority areas for economic regeneration, infrastructure and environmental enhancement in accordance with the NPPF (21).</p>
<p><i>Is there an up to date assessment of the deliverability of allocated employment sites, to meet local needs, to justify their long-term protection (taking into account that LPAs should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of an allocated site being used for that purpose) para (22)?</i></p>	<p>As a result it is not considered that the employment planning policies in the Slough Plans are an impediment to encouraging sustainable growth.</p> <p>There are no new sites allocated for employment use. The only sites protected for employment use are the Existing Business Area which are already fully developed and well established. As a result there are no new allocations that need to be reviewed in accordance with paragraph 22 of the NPPF. There is no policy restriction to the alternative use of other commercial sites where redevelopment or change of use applications will be treated on their merits. (22)</p>

<b>2. Ensuring the vitality of town centres (paras 23-27)</b>			
<b>What NPPF expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what NPPF expects</b>	<b>Does your local plan address this issue and meet the NPPF's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
<p><i>Set out policies for the management and growth of centres over the plan period (23).</i></p>		<p>The NPPF (23) states that planning policies should promote competitive town centre environments and support their viability and vitality.</p> <p>There is general support for the town centre through the Core Strategy spatial vision, objective and core policies which support the vitality, viability and growth of the centre's over the plan period.</p> <p>The Spatial Strategy for Slough can be summarized as being one of '<i>concentrating development but spreading the benefits to help build local communities</i>'. This identifies the town centre as being the key location for major change.</p> <p>Core Policy 1 (Spatial Strategy) states '<i>that proposals for high density housing, intensive employment generating uses, such as major retail or leisure will be located in the appropriate parts of the town centre</i>'. This recognizes town centre's as the heart of the community and supports their viability and vitality (23).</p> <p>Core policy 6 (Retail, Leisure and Community Facilities) states '<i>all new major retail, leisure and community developments will be located in the shopping areas of Slough town centre</i>'. This supports the town centre first approach.</p> <p>This is implemented through the use of a sequential</p>	<p>The part of Core Policy 6 (Retail, Leisure and Community Facilities) which requires developers to demonstrate the need for an out of centre retail development is not fully compatible with the NPPF.</p> <p>There are no other conflicts with the NPPF.</p>



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	<p><i>Have you undertaken an assessment of the need to expand your town centre, considering the needs of town centre uses?</i></p>	<p>test set out in Core Policy 6 (Retail, Leisure and Community Facilities) which is in accordance with the NPPF (24) in all respects apart from the fact that the Core Policy requires developers to demonstrate that there is a "need" for the development.</p> <p>NPPF does not include a requirement to demonstrate need but it does, however, require an assessment of the impact of the proposed development on existing, committed and planned investment and an assessment of the impact on the vitality and viability of town centres (26). These assessments cannot be carried out without establishing what the overall demand for retail floorspace will be and so the question of need remains a key consideration in the quantification of retail impact.</p> <p>The need to expand the designated area of Slough town centre was considered as part of the preparation of the Core Strategy. This resulted in the Town Centre boundary being expanded northwards and westwards in order to accommodate more town centre type uses. The only change to the <i>Shopping Area</i> within the town centre was to include the Tesco Store within it in recognition of the fact that it had become an integral part of the centre.</p> <p>The decision not to enlarge the town centre shopping area was based upon the conclusion that there was a need to consolidate the existing centre and improve the quality, scale and range of new retail facilities within it.</p> <p>This will primarily be achieved through the redevelopment and reconfiguration of the Queensmere and Observatory shopping centres as set out in the Site Allocations DPD which is designed to improve the</p>	
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	<p><i>Have you identified primary and secondary shopping frontages?</i></p>	<p>range and attractiveness of Slough retail offer.</p> <p>Monitoring has shown that the town centre has continued to decline and has an 8% retail vacancy rate. The key retail scheme on the High Street with planning permission has not been implemented. As a result it is considered that the need for retail development can be met in full within Slough town centre in accordance with the NPPF (23) without the need to expand the town centre boundary.</p> <p>Local Plan Policy S1 (Retail Hierarchy) identifies the Farnham Road and Langley Village as District Centres. The Core Strategy identified the need to enlarge the anchor supermarkets in Farnham Road and the need for a new supermarket adjoining the Harrow Market centre in Langley.</p> <p>These improvements are being implemented through the Site Allocations DPD which also enlarged the size of the Farnham Road shopping centre.</p> <p>It is not considered necessary for there to be any further need to expand the boundaries of these centres.</p> <p>Local Plan Policy S8 (Primary and Secondary Frontages) identifies primary and secondary shopping frontages in the town and district centres and sets out which uses are permitted in each location. To protect the retail functions of the town centre core, primary shopping frontages are restricted to predominately retail use with the exception of bank's, building societies and A3 uses.</p>	
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<b>3. Supporting a prosperous rural economy (para 28)</b>			
<b>What NPPF expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what NPPF expects</b>	<b>Does your local plan address this issue and meet the NPPF's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
<i>Policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development (28).</i>	<i>Do your policies align with the objectives of para 28?</i>	Slough does not have any significant rural areas and so there are no policies in the plans which deal with the rural economy.	There are no conflicts with the NPPF.
<b>4. Promoting sustainable transport (paras 29-41)</b>			
<b>What NPPF expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what NPPF expects</b>	<b>Does your local plan address this issue and meet the NPPF's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
<i>Policies that facilitate sustainable development but also contribute to wider sustainability and health objectives (29).</i>  <i>Different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas (29).</i>		The NPPF (29) states that the transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel.  The Spatial Strategy of 'concentrating development in the town centre' is intended to ensure that intensive trip generating uses are located where the need to travel will be minimised and the use of sustainable transport modes maximized in accordance with the NPPF (34). This facilitates sustainable development but also contributes to wider sustainability and health objectives as required by the Framework (29).  Other policies support the provision and protection of	There are no conflicts with the NPPF.

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	<p><i>If local (car parking) standards have been prepared, are they justified and necessary? (39)</i></p> <p><i>(The cancellation of PPG13 removes the maximum standards for major non-residential development</i></p>	<p>pedestrian, cycle and bus routes (Saved policies T7 Rights of Way, T8 Cycling Network and facilities, and T9 Bus Networks and facilities) (35).</p> <p>Policies also promote other measures for transport solutions: Core Policy 7 requires Travel Plans for major trip generating uses to implement mitigation measures (36), and these may include the use of technologies to promote and monitor alternative modes of transport (29).</p> <p>The control of parking is an important tool for the implementation of the Spatial Strategy. As a result Core Policy 7 (Transport) states that no overall increase in parking will be allowed for commercial redevelopment, unless required for safety or operational reasons, and maximum restraint will be applied to residential schemes in the town centre.</p> <p>Elsewhere, the Core Strategy parking policy does not in general set a maximum but the policy requires appropriate provision to be made taking into account local conditions.</p> <p>The detailed parking standards were originally included in Appendix 3 of the Local Plan but are now set out in supplementary guidance.</p> <p>It is considered that these local parking standards comply with the NPPF (39) in that they take account of the type of development and its accessibility.</p> <p>The parking policies continue to apply maximum standards for non-residential development. This continues to be justified in order to meet the Core Strategy spatial strategy and strategic objectives of</p>	
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	<p><i>set out in Annex D. PPS4 allowed for non-residential standards to be set locally with Annex D being the default position. There is no longer a requirement to set non-residential parking standards as a maximum but that does not preclude LPAs from doing so if justified by local circumstances).</i></p> <p><i>Has it taken into account how this relates to other policies set out elsewhere in the Framework, particularly in rural areas? (34).</i></p>	<p>focusing development in accessible locations and supporting the Local Transport Plan’s aim of reducing car based modes of travel and increasing non car modes of travel.</p> <p>The parking policies are also consistent with the NPPF (30) (32) which support of a pattern of development that facilitates the use of sustainable modes of transport.</p>	
	<p><i>Have you worked with adjoining authorities and transport providers on the provision of viable infrastructure?</i></p>	<p>Slough is an urban area with no large rural areas requiring a different approach to travel.</p> <p>Neither the Core Strategy nor the Local Plan proposes car based highway infrastructure that affects adjacent authorities.</p> <p>The other transport infrastructure referred to in Core Policy 7 (Transport), such as the development of Slough as a Regional Transport Hub, improved links to Heathrow, improvements to the railway stations and the creation of a transport hub within Slough Trading Estate, have been the subject of discussion with the relevant parties. Some of these have also been subject to more detailed consultation through the Site Allocations DPD.</p> <p>The Council has worked with a range of partners to secure the funding for a new passenger rail link to Heathrow airport.</p>	

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<b>5. Supporting high quality communications infrastructure (paras 42-46)</b>			
<i>There are no new or significantly different requirements for the policy content of local plans in this section of the NPPF.</i>		<p>The NPPF (43) states that local planning authorities should support the expansion of electronic communications networks.</p> <p>Local Plan Policy EN7 (Telecommunications Development) sets out the criteria for dealing with such developments and there are no blanket bans on telecommunications equipment which are prohibited in the NPPF (44).</p>	There are no conflicts with the NPPF.
<b>6. Delivering a wide choice of high quality homes (paras 47-55)</b>			
<b>What NPPF expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what NPPF expects</b>	<b>Does your local plan address this issue and meet the NPPF's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
<p><i>Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements; this should include an additional buffer of 5% or 20% (moved forward from later in the plan period) to ensure choice and competition in the market for land (47).</i></p> <p><i>Illustrate the expected rate of housing delivery through a trajectory and</i></p>		<p>The NPPF (47) states that local planning authorities should significantly boost the supply of housing.</p> <p>Slough's housing requirement is based upon Core Policy 3 (Housing Distribution) which states that "a minimum of 6,250 new dwellings will be provided in Slough between 2006 and 2026".</p> <p>The policy also allows for a higher amount of housing to take place in accordance with South East Plan. As a result the minimum requirement for Slough, as set out in the regional plan, is 6,300 new dwellings are built in Slough over the period 2006-2026. This equates to an average of 315 new dwellings per year. This will continue to be the housing target for Slough even though the Regional Spatial Strategy is in the process of being abolished by the Localism Act.</p>	There are no conflicts with the NPPF.

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<p><i>set out a housing implementation strategy describing how a five year supply will be maintained (47).</i></p>	<p><i>What is your record of housing delivery?</i></p> <p><i>Have you identified:</i></p> <p><i>a) five years or more supply of specific deliverable sites;</i></p> <p><i>b) an additional buffer of 5% (moved forward from later in the plan period), or</i></p> <p><i>c) If there has been a record of persistent under delivery have you identified a buffer of 20% (moved forward from later in the plan period)? [Para 47].</i></p> <p><i>Does this element of housing supply include windfall sites; if so, to what extent is there 'compelling evidence' to justify their inclusion (48)?</i></p>	<p>Completions over the first 5 years of the plan period have averaged 437 a year which is significantly above the required average of 315 per annum</p> <p>The updated housing trajectory and the latest five years land supply assessment in the AMR 11/12 which was produced in August 2012 shows there is a five and fifteen year supply of specific deliverable sites in accordance with the NPPF. (47)</p> <p>Slough also has five year land supply when the need for an additional 5% buffer as set out in the NPPF (47) is taken into account</p> <p>As explained above, Slough has exceeded its housing allocation in the first five years of the plan. As a result it does not have a record of persistent under delivery and does not have to identify a buffer of 20% additional housing in accordance with the NPPF. (47)</p> <p>Nevertheless the latest housing trajectory shows that even if a 20% buffer was required Slough still has a five years land supply.</p> <p>The housing supply does not rely of the inclusion of windfalls to meet the housing supply. As a result it complies with the NPPF (48) and additional sites could come forward in the plan period.</p>	
	<p><i>To what extent does the removal of national and regional brownfield</i></p>	<p>Core Strategy-Core Policy 1 <i>'states that all development will take place in the built up area, predominately on previously developed land'</i></p>	

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	<p><i>targets have an impact on housing land supply?</i></p>	<p>Core policy 3 (Housing Distribution) recognizes, however, that there will be major Greenfield developments in the form of urban extensions.</p> <p>The latest Annual Monitoring Report shows that 66% of dwellings were built on previously developed land. It is expected that this figure will increase once the Greenfield sites have been completed.</p> <p>There are no policies which prevent the development of garden land, which has now been reclassified as "brownfield".</p> <p>As a result it is not considered that the removal of national and regional brownfield targets will have an impact on housing land supply in Slough.</p>	
<p><i>Plan for a mix of housing based on current and future demographic and market trends, and needs of different groups (50), and caters for housing demand and the scale of housing supply to meet this demand (para 159)</i></p>		<p>Objective C of the Core Strategy is <i>'to provide housing in appropriate locations which meets the needs of the whole community, is of an appropriate mix, type, scale and density; is designed and built to high quality standards and is affordable'</i></p> <p>The housing figures in the Core Strategy are consistent with the South East Plan which took account of objectively assessed needs.</p> <p>Core policy 3 (Housing distribution) sets out that a minimum of 3000 dwellings we be built in the town centre, urban extensions around 750 dwellings, major sites in other urban areas around 1,350 dwellings and small sites within the urban area around 600 dwellings.</p> <p>Core Policy 4 (Type of Housing) states that "high</p>	



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	<p><i>Does the plan include policies requiring affordable housing? Do these need to be reviewed in the light of removal of the national minimum threshold?</i></p> <p><i>Is your evidence for housing provision based on up to date, objectively assessed needs</i></p>	<p><i>density housing should be located in Slough town centre” and that in the urban areas outside the town centre “new residential development will predominantly consist of family housing”.</i> This policy allows a mix of housing to come forward which caters for different groups within the community.</p> <p>To maintain our housing stock and the high demand for family housing Core Policy 4 (Type of Housing) states that there <i>‘is no net loss of family accommodation as a result of flat conversions. Change of use or redevelopment’</i></p> <p>The combination of these policies will therefore provide a mix of housing for current and future demographic and market trends (50)</p> <p>A key element of Objective C of the Core Strategy is to provide housing that is affordable</p> <p>Affordable housing policy is set out in Core Policy 4 (Type of Housing) which states that <i>“all sites of 15 or more dwellings (gross) will be required to provide between 30% and 40% of the dwellings as social rented along with other forms of affordable housing’</i>. More information on the breakdown of forms of affordable housing and how this policy is to be implemented is provided in the Developers Guide.</p> <p>The Core Strategy reduced the minimum threshold for affordable housing from 25 units to 15. It is not intended to review this threshold at this stage.</p> <p>The assessment of need that informed the Core Strategy shows that the demand for affordable housing is great enough for there to be a requirement of between 30 and 40%. A recent update (2012) of that</p>	
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		<p>assessment shows the scale of demand for affordable units still exists.</p> <p>The Core Strategy refers to viability being a factor when deciding upon the proportion of affordable housing. Supplementary guidance in the form of the Developers Guide Part 2 makes it clear that viability of new development will be considered when applying affordable housing policy on a site by site basis.</p> <p>Several developments have been approved since the start of the economic down turn that include a substantial amount of affordable housing indicating that the existing policy, as currently applied, workable in many cases.</p> <p>The housing mix and the number of affordable homes are monitored through the Annual Monitoring Report.</p>	
<p><i>In rural areas be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate (54).</i></p>	<p><i>Have you considered whether your plan needs a policy which allows some market housing to facilitate the provision of significant additional affordable housing to meet local needs?</i></p>	<p>There are no significant rural areas in Slough and so this issue does not apply.</p>	
	<p><i>Have you considered the case for setting out policies to resist inappropriate development of residential gardens? (This is discretionary)(para 53)</i></p>	<p>There is no policy in the Core Strategy to resist the development of residential gardens.</p>	

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<p><i>In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.</i></p>	<p><i>Examples of special circumstances to allow new isolated homes listed at para 55 (note, previous requirement about requiring economic use first has gone).</i></p>	<p>There are no significant rural areas in Slough and so this issue does not apply.</p>	
<p><b>7. Requiring good design (paras 56-68)</b></p>			
<p><i>There are no new or significantly different requirements for the policy content of local plans in this section of the NPPF.</i></p>		<p>The NPPF places great importance upon the need to achieve a high quality of design for all development (57) and states that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area (64).</p> <p>Core Policy 8 (Sustainability and the Environment) fully reflects this objective with an emphasis upon development reflecting the street scene and the local distinctiveness of an area. This is supplemented by the Residential Extensions SPD.</p> <p>More detailed design criteria are set out in the "saved" Local Plan. These include Policies EN1 (Standard of Design), EN2 (Extensions), EN3 (Landscaping Requirements) and EN5 (Design and Crime Prevention).</p> <p>There are no new or significantly different issues raised by the NPPF on design.</p>	<p>There are no conflicts with the NPPF.</p>

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<b>8. Promoting healthy communities (paras 69-78)</b>			
<b>What NPPF expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what NPPF expects</b>	<b>Does your local plan address this issue and meet the NPPF's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
<p><i>Policies should plan positively for the provision and use of shared space, community facilities and other local services (70).</i></p>	<p><i>Does the plan include a policy or policies addressing community facilities and local services?</i></p> <p><i>To what extent do policies plan positively for the provision and integration of community facilities and other local services to enhance the sustainability of communities and residential environments; safeguard against the unnecessary loss of valued facilities and</i></p>	<p>The NPPF (69) states that the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities through the connected themes of safe and accessible environments; social, formal and informal recreational facilities, cultural facilities and services.</p> <p>Objective F of the Core Strategy is <i>'To maintain and provide for community services and facilities in appropriate locations that are easily accessible.'</i></p> <p>Core Policy 11 (Social Cohesiveness) states that <i>"The development of new facilities which serve the recognized diverse needs of local communities will be encouraged."</i></p> <p>The Site Allocations DPD makes provision for new community facilities as part of the comprehensive regeneration of key areas.</p> <p>Core Policy 12 (Community Safety) allows for provision of facilities to be laid out and designed to create safe and attractive environments, and is supported by Local Plan policy EN5 (Design and Crime Prevention).</p> <p>Core Policy 10 (Infrastructure) includes health, leisure and community facilities as necessary infrastructure,</p>	<p>There are no conflicts with the NPPF.</p>

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	<p><i>services; ensure that established shops, facilities and services are able to develop and modernize; and ensure that housing is developed in suitable locations which offer a range of community facilities and good access to key services and infrastructure?</i></p>	<p>and requires new development will only be permitted where it is supported by existing or new infrastructure. Where existing provision is insufficient the developer will be required to provide the necessary educational, health, leisure, community and cultural services.</p> <p>This requirement is also set out in Local Plan Policy OSC15 (Provision of Facilities in New Residential Developments).</p> <p>Core Strategy Core Policy 6 (Retail, leisure and community facilities) also states <i>‘that all community facilities/ services should be retained. In exceptional circumstances, it is agreed that that community facilities/ services may be lost or reduced in size to accommodate new development; developers will be required to contribute towards new or enhanced community facilities/ services locally.’</i></p> <p>Core Policy 2 provides strategic protection for public open spaces, and Local Plan policies OSC 1, OSC9 and OSC17 also cover the need to protect open spaces, allotments and community or religious facilities. Policy OSC5 sets out Public Open Space requirements for housing developments.</p> <p>Local Plan Policies CG1 (Colne Valley Park); Linear Park (CG2); CG4 (Slough Arm of the Grand Union Canal) and T7 (Rights of Way) all provide for the protection and enhancement of opportunities for informal recreation.</p>	
<p><i>Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular</i></p>	<p><i>Do you have a policy which would enable the protection of Local Green Spaces and manage any development within it in a</i></p>	<p>The NPPF (77) states that local communities should be able to designate land as Local Green Space where new development will be able to be ruled out.</p> <p>Land outside of the urban area is already designated</p>	

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<p><i>importance to them – 'Local Green Space' (76-78).</i></p>	<p><i>manner consistent with policy for Green Belts? (Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period. The designation should only be used when it accords with the criteria in para 77).</i></p>	<p>as Green Belt and all significant open space within the urban area is protected by Core Policy 2 (Green Belt and Open Space) which states that "existing private and public open spaces will be preserved and enhanced".</p> <p>Further protection is set out in the following Local Plan policies:</p> <p>OSC 1 Protection of Public Open Space OSC 2 Protection of School Playing Fields OSC 3 Protection of School Playing Fields declared surplus OSC 4 Protection of Private Playing Fields and Courts OSC 8 Green Spaces OSC 9 Allotments</p> <p>As a result it is unlikely that it will be necessary to designate land in Slough as Local Green Space.</p>	
<p><b>9. Protecting Green Belt land (paras 79-92)</b></p>			
<p><b>What NPPF expects local plans to include to deliver its objectives</b></p>	<p><b>Questions to help understand whether your local plan includes what NPPF expects</b></p>	<p><b>Does your local plan address this issue and meet the NPPF's expectations?</b></p>	<p><b>How significant are any differences? Do they affect your overall strategy?</b></p>
<p><i>The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances (82)</i></p> <p><i>Local planning authorities</i></p>		<p>The NPPF (79) states that the Government attaches great importance to green Belts. This is reflected in planning policy in Slough</p> <p>Following a major review of Green Belt in the Local Plan, Core Strategy Policy 2 (Green Belt and Open Spaces) states that opportunities will be taken to designate additional areas as Green Belt which have no development potential.</p>	<p>There are no conflicts with the NPPF.</p>

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<p><i>with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy (83).</i></p> <p><i>Boundaries should be set using 'physical features likely to be permanent' amongst other things (85)</i></p>		<p>A review of potential sites was carried out through the Site Allocations DPD which identified the areas of land to be put back into the Green Belt.</p> <p>As a result the plans have established the extent of the Green Belt in Slough using permanent physical features as boundaries in accordance with NPPF (83).</p>	
	<p><i>If you are including Green Belt policies in your plan, do they accurately reflect the NPPF policy?</i></p> <p><i>For example:</i></p> <p><i>LPAs should plan positively to enhance the beneficial use of the Green Belt. Beneficial uses are listed in para 81. PPG2 set out that 'Green Belts have a positive role to play in fulfilling objectives. Para 1.6 of PPG2 set out the objectives – some of these have been rephrased/ amended and 'to retain land in agricultural, forestry and related uses' has been omitted.</i></p> <p><i>Ensure consistency with the Local Plan strategy for</i></p>	<p>The only policy requirement set out in Core Policy 1 (Spatial Strategy) is that all development will take place within the built up area "unless there are very special circumstances that would justify the use of Green Belt land". This was the test set out in PPG2 which is repeated in paragraph 87 of the NPPF.</p> <p>There are no detailed development control type policies Local Plan or Core Strategy that deal with Green Belt. As a result there is no conflict with the policies in the NPPF which have replaced PPG2.</p> <p>The Core Strategy Policy 2 (Green Belt and Open Spaces) states that Wexham Park Hospital and Slough Sewage Works will continue to be designated as Major Existing Developed Sites within the Green Belt but once again there are no development control policies relating to these in the plans. As a result the omission of any reference to Major Existing Developed Sites in the NPPF does not create any conflict in policy.</p> <p>The Strategic Gap part of Core Policy 2 is derived from the Spatial Strategy in Core Policy 1. As a result it is a place making policy which is needed to help implement the Spatial Strategy of "concentrating development".</p> <p>The Strategic Gap policy has been found by the Courts</p>	

*meeting identified requirements for sustainable development (85).*

*Does it allow for the extension or alteration of a **building**, provided that it does not result in disproportionate additions over and above the size of the original building? (89). PPG2 previously referred to dwelling. Original building is defined in the Glossary.*

*Does it allow for the replacement of a **building**, provided the new building is in the same use and not materially larger than the one it replaces? (89) PPG2 did not have a separate bullet point – replacement related to dwellings rather than buildings.*

*Does it allow for limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land) whether redundant or in continuing use (excluding temporary buildings), which would not have a*

to be an additional layer of policy restraint over and above that of Green Belt and a very high bar to development. As a result the Green Belt policy set out in the NPPF is not applicable to the Strategic Gap and Colne Valley Park elements of Core Policy 2.

There are no detailed development control policies in the Local Plans which deal with alterations or the replacement of buildings, infilling or the development of park and rides in the Green Belt.

Local Plan policies on the protection of the Green Belt were not saved in order to avoid duplication with the then national Planning Policy Guidance. As a result there is no conflict with the policies in the NPPF



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*greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development? (89)  
(PPG2 referred to 'major existing developed sites')*

*Change from 'Park and Ride' in PPG2 to local transport infrastructure and the inclusion of 'development brought forward under a Community Right to Build Order' in relation to other forms of development that are not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt. (90).*

<b>10. Meeting the challenge of climate change flooding and coastal change (paras 93-108)</b>			
<b>What NPPF expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what NPPF expects</b>	<b>Does your local plan address this issue and meet the NPPF's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
<i>Adopt proactive strategies to mitigate and adapt to climate change taking full</i>	<i>Have you planned new development in locations and ways which reduce</i>	Slough is highly urbanized and experiences flooding from fluvial and surface water sources.	There are no conflicts with the NPPF.

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<p><i>account of flood risk, coastal change and water supply and demand considerations (94).</i></p>	<p><i>greenhouse gas emissions?</i></p>	<p>Core Strategy Strategic Objective J sets out the Council's intention to reduce areas subject to flooding, and control the location of development to protect people and their property from the effects of flooding.</p> <p>Core Policy 8 (sustainability and the Environment) states that <i>"development will only be permitted where it is safe and it can be demonstrated that there is minimal risk of flooding"</i> and <i>"must manage surface water arising from the site in a sustainable manner which will reduce the risk of flooding and improve water quality"</i>.</p> <p>The quality of watercourses is protected under Local Plan Policy EN24 which requires development measures to avoid detriment, and where possible to enhance watercourses.</p> <p>The Core Strategy spatial strategy (CP1) requires all development to be in the built up area and for development to be concentrated in the town centre or accessible locations. This reduces travel demand and encourages use of non car modes of travel thus reducing emissions.</p> <p>The Site Allocations Development Plan Document promotes the development of key sites in order to implement the Core Strategy.</p>	
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<p><i>Does your plan actively support energy efficiency improvements to existing buildings?</i></p>	<p>Core Strategy Policy 8 (Sustainability and the environment) requires all development to be sustainable and address the impact of climate change. Consequently the policy does not conflict with the NPPF. Policy 8 also requires new development to include measures that minimize the consumption of energy. The Strategy does not specifically refer to improvements to existing buildings. However the policy could be implemented in such a way as to ensure that applications for extensions to buildings include overall energy efficiency improvements to the entire building. New developments where there is limited scope for incorporating practical renewable energy installations could be required to fund off site energy efficiency improvements in existing buildings.</p>	
<p><i>When setting any local requirement for a building's sustainability, have you done so in a way that is consistent with the Government's zero carbon buildings policy and adopt nationally described standards? (95)</i></p>	<p>The opportunity for the planning system to influence changes in existing buildings where no planning application is made is limited. The funding of off site works referred to above is likely to be part of the future Allowable Solutions aspect of Government's Zero Carbon Homes standard from 2016 (residential) and 2019 (non residential).</p> <p>In terms of building owners wishing to introduce energy efficiency measures on existing buildings that require planning permission (such as exterior cladding) the implementation of the Council's design policies can be altered to take account of these measures. There is no need to change the Core Strategy policy. Supplementary guidance can explain how the policy is to be implemented such that energy efficiency improvements to existing buildings are supported.</p> <p>The stated method of implementation of Core Policy 8 (re design and construction of development) is to use nationally described standards – BREAAAM, Code for Sustainable Homes and CEEQUAL.</p>	

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<p><i>Help increase the use and supply of renewable and low carbon energy (97).</i></p>	<p><i>Do you have a positive strategy to promote energy from renewable and low carbon sources?</i></p>	<p>Core Strategy Policy 8 (Sustainability and the environment) requires all development, where feasible, to include measures to generate energy from renewable resources. The stated method of implementation of the policy makes it clear that 'low carbon' energy is also included as does supplementary guidance (The Developers Guide Part 2 &amp; 4). The supplementary guidance can be altered to specifically refer to opportunities to draw energy from decentralised energy sources in accordance with the NPPF (97).</p>	
	<p><i>Have you considered identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources (see also NPPF footnote 17)</i></p>	<p>Because of the small size of the Borough and the extent of built development the Core Strategy does not specifically identify areas suitable for renewable or low carbon energy.</p>	
<b>11. Conserving and enhancing the natural environment (paras 109-125)</b>			
<p><b>What NPPF expects local plans to include to deliver its objectives</b></p>	<p><b>Questions to help understand whether your local plan includes what NPPF expects</b></p>	<p><b>Does your local plan address this issue and meet the NPPF's expectations?</b></p>	<p><b>How significant are any differences? Do they affect your overall strategy?</b></p>
<p>Planning policies should minimise impacts on biodiversity and geodiversity (para 117).</p>		<p>The NPPF (109) states that the planning system should enhance the natural and local environment.</p> <p>Objective H of the Core Strategy is "to protect, enhance and wherever practically possible increase the size of the Borough's biodiversity, natural habitats and water environment."</p>	<p>There are no conflicts with the NPPF.</p>

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		<p>Core Policy 9 (Natural and Built Environment) requires that development should “<i>enhance and preserve the natural habitats and biodiversity of the Borough</i>” and “<i>protect and enhance the water environment and its margins.</i>”</p> <p>Local Plan Policy EN22 (Protection of Sites with Nature Conservation Interest) requires the impacts of development on identified and potential wildlife heritage sites or areas with ecological value to be minimized and addressed.</p> <p>EN24 (Protection of Watercourses) recognises and protects watercourses with ecological value.</p> <p>Policies such as EN23 (Areas of Local Nature Conservation Interest) CG1 (Colne Valley Park) CG2 (Linear Park) CG4 (Slough Arm of the Grand Union Canal) all refer to the amenity value these sites have, including visual and informal recreational.</p>	
	<p><i>If you have identified Nature Improvement Areas, have you considered specifying the types of development that may be appropriate in these areas (para 117)?</i></p>	<p>The Council has not formally identified any Nature Improvement Areas.</p> <p>The Site Allocations DPD has, however identified seven potential Non-Statutory Informal Nature Reserves where it is proposed to enhance biodiversity.</p>	
<p>Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (114 &amp; 117).</p>		<p>Paragraph 4.56 of the Site Allocations DPD recognises the importance of the regional ‘Biodiversity Areas of Opportunity’ in and adjoining Slough that are promoted in the South East Biodiversity Action Plan.</p> <p>Core Policy 9 (Natural and Built Environment) sets out a requirement to protect and enhance biodiversity of</p>	

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		<p>the Borough, including corridors between biodiversity rich features.</p> <p>Core Policy 2 (Green Belt and open spaces) and Local Plan CG1 (Colne Valley Park) provide protection for the part of the Regional Park that runs through Slough. They recognise its multifunctional role, including its nature conservation value.</p>	
<b>12. Conserving and enhancing the historic environment (paras 126 – 141)</b>			
<p>There are no new or significantly different requirements for the policy content of local plans in this section of the NPPF.</p>		<p>The NPPF states that Local Planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment (126).</p> <p>Core Policy 9 (Natural and Built Environment) sets out the principle that development will not be permitted unless it enhances and protects the historic environment and local designations.</p> <p>These local designations are set out in Local Plan Policies EN13, (Conservation Areas), EN17 (Locally Listed Buildings), TC2 (Slough Old Town) and H12 (Residential Areas of Exceptional Character)</p> <p>Further guidance on the protection of the historic environment was not included in the Local Plan in order to avoid duplication with the then national Planning Policy Guidance. As a result there is no conflict with the policies in the NPPF.</p>	<p>There are no conflicts with the NPPF.</p>

<b>13. Facilitating the sustainable use of minerals (paras 142-149)</b>			
<b>What NPPF expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what NPPF expects</b>	<b>Does your local plan address this issue and meet the NPPF's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
<p>It is important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation (142).</p>		<p>The NPPF states that it is essential that there is a sufficient supply of minerals to meet the country's needs (142) and that Local Plans should plan for a steady and adequate supply of aggregates (145).</p> <p>It is recognized that the strategic policies in the Replacement Minerals Local Plan for Berkshire, which deal with the supply of aggregates is completely out of date. As a result there is no minerals allocation for Slough.</p> <p>This is however not necessarily an issue because, as the NPPF (142) acknowledges, minerals can only be worked where they are found. The situation in Slough is that after years of minerals extraction virtually all of the resources have been dug. The Minerals Local Plan identifies two remaining "Preferred Areas" which effectively constitute Slough's entire potential supply.</p> <p>Policy 10 (Outside Preferred Area) of the Minerals Plan sets out a presumption against minerals extraction outside of Preferred Areas based upon previous calculations that there was an adequate supply of minerals in Berkshire. Since the current policy vacuum means that it is not possible to assess whether there still is an adequate supply in Berkshire or Slough, it is not considered appropriate to continue to apply Policy</p>	<p>There is no current minerals allocation for Slough which means that the plan does not fully meet the requirements of the NPPF.</p> <p>It is also considered that the presumption against minerals extraction outside of Preferred Areas in the Minerals Local Plan policy 10 is not compatible with the NPPF.</p> <p>Apart from this there are no conflicts with the NPPF.</p>

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		<p>10.</p> <p>This would mean that there would no longer be any policy restrictions that would prevent a sufficient supply of aggregates coming forward in Slough.</p> <p>As a result, although there is a policy gap, it is not considered that there is a conflict with the NPPF.</p> <p>The remaining "saved" policies in the Replacement Minerals Plan meet all of the development control type requirements of the NPPF (143). These include:</p> <ul style="list-style-type: none"> <li>• Safeguarding of sand and gravel deposits</li> <li>• Identified Preferred Areas for Sand and Gravel</li> <li>• Transport of Minerals</li> <li>• Safeguarding of Rail Depots</li> <li>• Oil and Gas</li> </ul>	
	<p><i>Does the plan have policies for the selection of sites for future peat extraction? (143) (NPPF removes the requirement to have a criteria based policy as peat extraction is not supported nationally over the longer term).</i></p>	<p>There are no policies for the extraction of peat.</p>	