

SLOUGH BOROUGH COUNCIL

REPORT TO: Planning Committee **DATE:** 18th February 2016
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WARD(S): All

PART I **FOR DECISION**

CONSULTATION ON SOUTH BUCKS AND CHILTERN LOCAL PLAN (REG 18)

1 Purpose of Report

The purpose of the report is to respond to the consultation document that has been prepared for a new joint South Bucks and Chiltern Local Plan.

2 Recommendation(s)/Proposed Action

The Committee is requested to resolve that:

- a) South Bucks and Chiltern be thanked for consulting the Council on the new Joint Local Plan for South Bucks and Chiltern Districts;
- b) the Councils should be formally requested to consider the scope in the new Joint Local Plan for an urban extension of Slough in the form of a new 'Garden Suburb' which will help to meet the housing needs within the area;
- c) the detailed comments set out in paragraphs 5.21- 5.45 below be agreed and forwarded to South Bucks and Chiltern Districts in response to the Consultation;
- d) Delegated powers be granted to the Planning Manager to make further detailed comments on the technical matters within the consultation document and supporting evidence base;
- e) the Council would welcome the opportunity to continue to discuss planning matters in accordance with the Duty To Co-operate.

3 The Slough Joint Wellbeing Strategy, the JSNA and the Five Year Plan

3a. Slough Joint Wellbeing Strategy Priorities

Ensuring that local needs are met within Local Plans will have an impact upon the following SJWS priorities:

- *Health*
- *Economy and Skills*
- *Regeneration and Environment*
- *Housing*

- *Safer Communities*

3b. **Five Year Plan Outcomes**

Ensuring that development is properly planned around Slough will contribute to the following Outcomes:

- 1 *Slough will be the premier location in the South East for businesses of all sizes to locate, start, grow and stay.*
- 2 *There will be more homes in the borough with the quality improving across all tenures to support our ambition for Slough.*
- 3 *The centre of Slough will be vibrant, providing business, living and cultural opportunities.*

4 **Other Implications**

(a) Financial

There are no financial implications of the proposed action.

(b) Risk Management

It is considered that the risks can be managed as follows:

<i>Recommendation</i>	<i>Risk/Threat/Opportunity</i>	<i>Mitigation(s)</i>
That comments on the South Bucks and Chiltern Joint Local Plan Consultation be forwarded to South Bucks Council	Not commenting upon the proposals risks losing the ability to influence both the way that development takes place in adjoining areas; and obligations under the Duty to Co-operate.	Agree the recommendations.

(c) Human Rights Act and Other Legal Implications

There are no Human Rights Act Implications as a result of this report.

(d) Equalities Impact Assessment

There are no equality impact issues.

5 **Supporting Information**

Background

- 5.1 Up until recently South Bucks and Chiltern Councils were preparing separate Local Plans for their respective districts. As part of this work South Bucks produced a Regulation 18 Consultation Document in February 2015 which this Council responded to in compliance with the Duty to Co-operate in April 2015.
- 5.2 In November 2015 South Bucks and Chiltern confirmed they would now produce a joint Local Plan. This means that they have to carry out all of the consultation again and while they have considered the outcomes of previous consultations as a whole, any specific representations made in that process will not be able to be considered as part of taking the new joint plan forward.

5.3 The new consultation consists of three elements which are:

- a) **Regulation 18 Consultation on a joint Chiltern and South Bucks Local Plan** – to seek views on the scope of the plan, what the plan should seek to address and to help inform the plan vision, development strategy and plan objectives.
- b) **Issues and Options Consultation on a joint Chiltern and South Bucks Local Plan** – to seek views on what the councils consider to be the key issues (subject to additional issues being raised as part of this consultation) that the Joint Local Plan will need to address and to seek views on the options identified to be tested during the next stage of the plan process. The Issues and Options consultation being informed by the emerging evidence base, Duty to Co-operate discussions and national planning policy and guidance.
- c) **The opportunity to comment on the Joint Local Plan evidence base**

5.4 The consultation closes on the 14th March 2016. The Councils then intend to produce a Preferred Options consultation in Oct/Nov 2016 followed by a Draft Plan for public consultation in early 2017 and submission later in the year.

5.5 The consultation paper highlights the importance of this stage in the Joint Local Plan process as it will:

- a) provide the opportunity for local residents, businesses and other interested parties to help establish the scope of the Plan;
- b) consider key evidence base studies, test their findings and implications, enable comments on draft evidence base work and consider whether there are any gaps in the evidence base;
- c) update on Duty to Co-operate discussions and consider further co-operation issues that may need to be addressed;
- d) establish and test the key issues that the Joint Local Plan will need to address;
- e) consider options for a development strategy to meet development needs and options for strategic development proposals
- f) consider sustainability criteria against which options and the plan will be tested;
- g) scope the development management policies to be included in the plan;
- h) encourage local communities and neighbourhoods to suggest 'local measures' they would like to see included in the Plan;
- i) provide the opportunity for other issues, concerns or opportunities to be raised; and
- j) secure views from local residents, groups, businesses, land owners, developers and organisations to help shape the Plan

5.6 The joint plan is being prepared upon the basis that there is a need for 15,100 houses to be built between 2014 and 2036. This is made up from a need of 7,800 in South Bucks and 7,300 in Chiltern but there will not be separate allocations for the two districts. There is also a need for an additional 15 hectares of employment land of which 13 hectares are needed in South Bucks.

5.7 The Councils are carrying out a Housing and Economic Land Availability Assessment (HELAA) to identify the potential development land within the plan area. This work has not yet been completed but a draft HELAA has been prepared in order to inform the Issues and Options stage. This has concentrated upon identifying sites within the existing built-up areas and on previously developed land within the Green Belt.

- 5.8 Although the Councils state that they are seeking to maximise development within the plan area to meet needs, they recognise that it is probable that they will not be able to meet all needs because of Green Belt, Areas of Outstanding Natural Beauty (AONB) and other constraints /limitations.
- 5.9 Although they have carried out a Green Belt Assessment, which identifies parcels of land to be assessed in a further study to see whether they should be removed from the Green Belt, there is no commitment to do so at this stage.
- 5.10 The Councils are exploring whether there are options for meeting their needs outside of the joint local plan area. They have made submissions to the Aylesbury Vale Local Plan Issues and Options consultation requesting that they explore the scope for 7,500 dwellings and supporting employment needs from the Chiltern/South Bucks Plan area to be accommodated in Aylesbury Vale.
- 5.11 The consultation document states that there appears to be no scope to within the joint plan area to accommodate any unmet need from adjacent areas, although this will be kept under review.
- 5.12 This is a major issue for Slough because in our representations to South Bucks' previous Regulation 18 consultation we made it clear that there was a need to at least test the development of urban extensions to Slough.

Spatial Strategies

- 5.13 The consultation states that, given the overall levels of need and limited scope for development to meet that need, the Councils consider that there are exceptional circumstances which justify a review of the Green Belt and the existing settlement hierarchy. As a result they intend to test a number of spatial strategy options.
- 5.14 There are 11 options set out in the consultation document which include:
- Option A - Making more efficient use of land within the built up areas;
 - Option C - Extensions to the principle settlements of Chesham, Amersham, Little Chalfont, Beaconsfield, Chalfont St Peters, Gerrards Cross and Burnham;
 - Option D - Extensions to principle settlements outside of the plan area such as Wycombe, Uxbridge, Slough and Maidenhead;
 - Option E - Extensions to a wider range of settlements including Farnham Royal;
 - Option J - Growth options close to the train stations at Chesham, Great Missenden, Amersham, Little Chalfont, Seer Green, Iver and Taplow
 - Option K - New employment sites
- 5.15 Preliminary work has been carried out for some of these Options by identifying sites for further testing and consideration as part of the next stage of the Local Plan:
- For *Option C* - a number of potential Green Belt sites have been identified for housing but none of them are around Burnham.
- For *Option D* - two sites to the west and south of George Green (referred to as Middle Green) have been identified but no other sites adjacent to Slough.

For *Option E* - sites to the north of Farnham Royal and south of Stoke Pages have been identified.

For *Option K* - an Employment Area of Search has been identified south of Taplow station and reference is made to the possibility of redeveloping existing employment land near Iver should the Heathrow Airport expansion proceed.

- 5.16 Whilst the fact that South Bucks and Chiltern are considering so many options is welcomed it remains a concern that they are still not considering this Council's preferred option which is for the northern expansion of Slough through the construction of a new 'Garden Suburb' on land adjoining Slough.
- 5.17 There is also concern about the extent to which these Options will actually be tested in practice since it is not clear on what basis any of the sites would actually be allocated for development.
- 5.18 In addition, apart from the possible employment site south of Taplow, no sites have been identified which could help to implement the option of having growth points around Taplow and Iver Stations.
- 5.19 As a result it is suggested that South Bucks and Chiltern Councils should be requested to develop a comprehensive strategic planning option which would consider a major urban expansion of Slough combined with selective growth around Taplow and Iver stations. This would complement a similar option which could be developed through the review of the Local Plan for Slough of having selective growth points around the other Crossrail stations at Burnham, Slough and Iver.

Specific Questions on the Consultation

- 5.20 The consultation is set out with a series of questions. Based upon the assessment set out above it is considered that the following detailed responses should be made where appropriate.

<p><i>Question 1: Do you have any comments on the definition of housing and functional economic market areas being used, on the draft Buckinghamshire Housing and Economic Development Needs Assessment or on the needs assessment work planned during the next stages of the Joint Local Plan process?</i></p>

- 5.21 South Bucks and Chiltern have been identified as being in different Housing Market Areas in the work carried out by ORS for the Buckinghamshire authorities and by GL Hearn for the Berkshire authorities. It is only because they have now decided to prepare a single plan that they have decided to include South Bucks in a single larger (Central Buckinghamshire) Housing Market Area for pragmatic reasons.
- 5.22 The fact that South Bucks has now been added to the Buckinghamshire Housing Market Area for administrative purposes does not however alter the functional geographic relationship between Slough and South Bucks.
- 5.23 Chiltern and South Bucks are now seeking to use the change to the groupings within the HMAs, which was made for purely administrative reasons, to justify changing the way in which planning is carried out in the area. They have therefore made representations to Slough's Regulation 18 Consultation that they would

expect Slough to first seek to accommodate any of its unmet development within the Berkshire-wide housing market area rather than South Bucks.

- 5.24 It is considered that this approach ignores the evidence that there is a strong functional relationship between South Bucks and Slough which cannot be ignored because a pragmatic “best fit” approach has been adopted for defining HMAs. The ORS report also concluded, “we would emphasise again that this “best fit” grouping does not change the actual geography of the functional housing market areas that have been identified. In developing their Joint Plan, it will be important for the Councils to consider any decisions about the spatial distribution of housing and employment in the context of the functional geographies”.
- 5.25 The position with regards to determining the Objectively Assessed Housing Need figure is also complicated by the pragmatic decision to move South Bucks into the Buckinghamshire HMA. The Berkshire and South Bucks SHMAA produced by GL Hearn had a figure of 376 per year for South Bucks. ORS have now recalculated what the Objectively Assessed need for South Bucks should be when it is in the Bucks HMA and come up with a slightly lower figure of 354.5 per year. Whilst the change is partly due to the new aggregation of data it is also due to ORS making different assumptions particularly in the way that the Government’s Household Projections should be discounted. Further representations may need to be made about this in due course but in the meantime it is considered that the housing needs figure provides a pragmatic basis for preparing the Local Plan.
- 5.26 The Economic Development Needs Assessment (EDNA) being prepared for Berkshire by Nathaniel Litchfield identifies South Bucks as being part of a wider Functional Economic Market Area which includes Slough (and Windsor and Maidenhead). The EDNA study will not include an employment land figure for South Bucks and so the figure of 15 hectares of new employment need is the most appropriate to use in the Joint plan. It is considered that the evidence that there is far greater need for new employment land in South Bucks than Chiltern should be reflected in the distribution of any new allocations.

Question 2: Do you have any comments on the draft HELAA, particularly in relation to whether included sites are likely to be deliverable by 2036 and whether additional sites should be added?

- 5.27 The part of the draft HELAA which assesses whether sites in South Bucks are suitable, available and achievable has not yet been published but they are unlikely to be of strategic importance because they do not include Green Belt sites. It will, however, be important that optimum densities are achieved on all sites that come forward for development, and that demand for employment land is met as close to where it arises as possible.

Question 3: Are there any existing uses/sites not currently identified in the HELAA and within the built up areas that may be surplus to requirements or where the existing use could be consolidated or re-provided elsewhere such as open spaces?

- 5.28 No comments

Question 4: Do you agree with the approach to the Joint Local Plan Vision and Objectives and if not what changes or additions do you consider are needed?

Please explain your reasoning for suggesting any alterations.

- 5.29 The Vision for the Joint Plan will need to be adjusted to reflect the fact that it will no longer be possible to protect all of the Green Belt if all local needs are to be met.

Question 5: What spatial strategy option or options do you think that the councils should consider and what should be the priority order?

- 5.30 It is considered that in order to accommodate the growth pressures originating in South Bucks/Chiltern and Slough, an option which promotes the northern expansion of Slough on a comprehensive basis to create a new 'Garden Suburb' should be considered. This is likely to be the most sustainable location for new housing within the plan area because it would be located next to the largest conurbation with all of its existing facilities and employment opportunities. The preliminary work that has been carried out so far as part of the testing of Option D has not identified where the most accessible locations are for new development. As a result a new exercise should be carried out to see how new housing can be provided in a more comprehensive and sustainable way north of Slough as part of Option D.

- 5.31 In addition further work should be carried out to identify sustainable growth options around the future Crossrail stations in accordance with Option J. This would be consistent with the proposed changes to the NPPF to encourage development around Commuter Hubs.

Question 6: Do you have comments on individual options generally or specific settlements/sites that could be part of these options?

- 5.32 Having identified the need to consider the expansion of Slough together with the areas around Taplow and Iver stations Burnham and Richings Park it is not proposed to identify any specific sites at this stage.

Question 7: Do you have comments on the suggested level of unmet needs in Chiltern/South Bucks?

- 5.33 In the absence of all of the evidence it is not possible to properly assess what the level of unmet need is in Chiltern and South Bucks. It can only be assumed from the request that Aylesbury Vale should explore the scope for accommodating 7,500 dwellings and supporting employment needs that this is the shortfall. It is not clear what assumptions have been made about releasing Green Belt land for development or what other policy responses have been considered in coming to the conclusion about unmet need.

- 5.34 As a result it is not considered that any definitive conclusions can be made about unmet need at this stage of the plan process.

Question 8: Do you have comments or suggestions on how the councils can meet its local affordable housing need?

- 5.35 It is not clear from the consultation document what type of affordable housing is being proposed in the plan but it is considered that a full range of accommodation, including affordable housing for rent, should be provided to meet the identified

needs.

5.36 It is considered that viability issues relating to the supply of affordable housing can best be overcome by the release of Green Belt land on a properly planned basis. If it is necessary to secure a higher amount of affordable housing an increased level of market housing should be considered.

5.37 The proposal to meet the unmet need for general housing in Aylesbury Vale should not result in insufficient affordable housing being built to meet the needs arising from existing residents in South Bucks and Chiltern.

Question 9: *Do you have comments on the above options to meet the needs of Gypsies, Travellers and Travelling Showpeople?*

5.38 No comments at this stage.

Question 10: *How do you think that the Joint Local Plan can best meet specialist elderly accommodation needs, both in global and affordable needs?*

5.39 The plan should provide the authorities with the ability to specify what the appropriate mix of accommodation should be on a site by site basis which will meet the needs at the time.

Question 11: *Do you have a view on the Heritage Strategy?*

5.40 No Comments.

Question 12: *Are you aware of any currently unprotected local heritage assets that should be identified?*

5.41 No comments.

Question 13: *Local Green Space nominations?*

5.42 No comments.

Question 14: *Do you have any nominations for Local Measures?*

5.43 No comments.

Question 15: *Do you have a view on the scope of policies proposed in Appendix 7?*

5.44 No comments at this stage.

Question 16: *Do you have any comments on the Settlement /infrastructure Capacity Study?*

5.45 The Infrastructure capacity work should also consider settlements such as Slough which are on the edge of the plan area and have the ability to expand.

6 Conclusion

- 6.1 The consultation on the Chiltern and South Bucks 2014-2036 Local Plan Issues and Options raises a number of issues for Slough which we have highlighted in the previous consultation response and through the Duty to Co-operate.
- 6.2 Whilst the fact that South Bucks and Chiltern are considering a number of options is welcomed, it remains a concern that they are still not considering this Council's preferred option which is for the northern expansion of Slough through the construction of a new 'Garden suburb'.
- 6.3 As a result it is recommended that South Bucks and Chiltern Councils should be requested to develop a comprehensive strategic planning option which would consider a major urban expansion of Slough combined with selective growth around Taplow and Iver stations. This would complement a similar option which could be developed through the review of the Local Plan for Slough of having selective growth points around the other Crossrail stations at Burnham, Slough and Iver.
- 6.4 Meetings have been held at Member and Officer level to discuss the key planning issues in accordance with the Duty to Co-operate and it suggested that these should continue to be used to try to resolve outstanding issues.

7 Background Papers

- '1'- Report to Planning Committee 1st April 2015 "Consultation on South Bucks and Spelthorne Local Plans"
- '2'- Emerging Chiltern and South Bucks Local Plan 2014 – 2036 Initial Consultation (Regulation 18) Incorporating Issues and Options – January 2015