

SLOUGH BOROUGH COUNCIL

REPORT TO: Planning Committee **DATE:** 7th December 2016
CONTACT OFFICER: Paul Stimpson
Planning Policy Lead Officer
(For all Enquiries) (01753) 875820
WARD(S): All

PART I **FOR DECISION**

RESPONSE TO SOUTH BUCKS & CHILTERN GREEN BELT PREFERRED OPTIONS CONSULTATION

1 Purpose of Report

The purpose of the report is to seek Member's views on the response to the South Bucks and Chiltern consultation on Preferred Green Belt Options, and the failure to properly consider Slough Borough Council's previous representations about the need for the northern expansion of Slough.

2 Recommendation(s)/Proposed Action

The Committee is requested to resolve that Chiltern and South Bucks be informed that this Council:

- a) Is concerned about the overall decision making process and shortcomings in the methodology for selecting sites for development in the Green Belt;
- b) Is concerned that Chiltern and South Bucks Councils have not properly considered our previous representations to the Issues and Options consultation that there should be an urban expansion of Slough in the form of a new 'Garden Suburb' which will help to meet the housing needs in the area.
- c) Objects to the amount and distribution of housing in the Green Belt Preferred Options which will fail to meet housing needs where they arise and increase pressures on the housing market in an area that is already one of the least affordable in the country.
- d) Requests that Chiltern and South Bucks Councils formally consider the proposal for the northern expansion of Slough combined with selective growth around Taplow, Langley and Iver stations as Preferred Options.

The Committee is also requested to grant delegated powers to Officers to make further detailed comments on the Preferred Green Belt Options consultation, and continue to discuss the matter under the Duty to Cooperate.

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

3a. Slough Joint Wellbeing Strategy Priorities

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

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

3b. Five Year Plan Outcomes

Ensuring that housing is built in the wider area will contribute to the following Outcome:

- 2 *There will be more homes in the borough with the quality improving across all tenures to support our ambition for Slough.*

4 Other Implications

(a) Financial

There are no financial implications of the proposed action in this report which can be achieved within existing budgets.

(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 the Committee makes representations on the Chiltern and South Bucks Green Belt Preferred Options.	Failure to do so could increase housing pressures in Slough. and delay the preparation of Slough Local Plan,	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.

4 Supporting Information

Introduction

- 5.1 Chiltern and South Bucks Councils are currently preparing a joint Local Plan to cover the period up to 2036.
- 5.2 In January 2016 they carried out an Issues and Options consultation which sought views on what the Councils considered to be the key issues for the Joint Plan as well as the identified options.
- 5.3 This Council made a number of representations but the key one was that, that

there should be an urban expansion of Slough in the form of a new 'Garden Suburb' which will help to meet the housing needs in the area. We also suggested this should be combined with selective growth around Taplow and Iver stations. We also questioned elements of the Sustainability Appraisal process.

5.4 Chiltern and South Bucks are now consulting on preferred development options in the Green Belt (1 hectare or more in size); the evidence base documents that support them and views on whether alternative or additional options should be considered. Sufficient work has been undertaken to arrive at preferred options however this work is not complete and is on-going.

5.5 They have produced the following three documents which they are particularly consulting on:

- Green Belt Preferred Options Consultation Document
- Draft Green Belt Assessment Part Two
- Green Belt Development Options appraisal

5.5 The Preferred Options Consultation Document contains 15 possible sites (over 1ha) for housing or employment use. None of these sites are, however, within the area of search that we have identified for the northern expansion of Slough. There is only one small site identified for residential or office use close to Taplow station.

5.6 It should be noted that Chiltern and South Bucks Districts have already carried out an assessment of the capacity of the Districts to meet the Objectively Assessed Housing Needs both within the urban areas and through the release of Green Belt sites. This has concluded that there are insufficient sites and that there could be a shortfall of around 5,800 dwellings within the two districts. As a result they have requested that Aylesbury Vale should build an additional 5,800 dwellings in their Local Plan. Whilst this may meet the overall housing numbers this will not help to relieve housing pressures in the south of the County.

5.7 It is considered that the way in which decisions are being made for the preparation of the Chiltern and South Bucks Local Plan could have significant impacts upon Slough and so representations should be made about the current consultation.

Lack of Local Plan Spatial Strategy

5.8 The first concern is that Chiltern and South Bucks Councils have produced Green Belt Preferred Options in advance of deciding what the preferred Spatial Option should be for the Local Plan.

5.9 The Issues and Options consultation contained 11 possible options. One of these (Option D) was to extend the principle settlements outside of the plan area such as Wycombe, Uxbridge, Slough and Maidenhead. We supported this option on the basis that it could facilitate the northern expansion of Slough.

- 5.10 Another option (Option J) was to have growth close to train stations. We also supported this on the basis that growth around Iver and Taplow stations would complement similar proposals for Slough, Burnham and Langley stations.
- 5.11 It was stated that all of the Options would be tested during the next stage of the plan process but so far this has only happened through the Green Belt Preferred Options work which has only assessed some of these options in terms of their impact upon the Green Belt.
- 5.12 The Spatial Options have for example not been properly tested to see whether they are the most sustainable forms of development or could best accommodate local needs.
- 5.13 In the current Green Belt Assessment Study only two of the sites that form part of the proposed northern expansion of Slough, which would form part of Option D, have been tested against the Sustainability Appraisal. Similarly growth around Taplow or Langley stations, which could form part of Option J, has not been tested against the Sustainability Appraisal.
- 5.14 It is assumed that the Sustainability Appraisal will be revised in light of representations made by Slough and others, and all of the alternative Options will be subject to a second Sustainability Appraisal before the Preferred Option version of the Plan is produced but it is not clear how or when this will be carried out. The Council would welcome the opportunity to comment on this under the Duty to Co-operate.
- 5.15 In the meantime it is difficult to comment upon the results of Green Belt Preferred Options in the absence of an overall Spatial Strategy for the Local Plan.

Proposal to Meet Unmet Housing Needs in Aylesbury Vale

- 5.16 Despite the lack of an agreed preferred Spatial Option for the Joint Local Plan, Chiltern and South Bucks Councils have concluded that there will be a shortfall of 5,800 dwellings within the two districts over the plan period. In order to do this they have had to make presumptions about which sites will come forward in the urban areas, what density development will be built at and how much land will be released from the Green Belt. As a result they have effectively preempted the proper consideration of the Spatial Options in the Local Plan and the Green Belt Preferred Options which are now being consulted upon.
- 5.17 In December 2015 Chiltern and South Bucks Councils made representations to Aylesbury Vale Council that it should accommodate 7,500 houses in its Local plan that could not be accommodated in the two districts. This figure has now been revised down to 5,800 dwellings.
- 5.18 Members will recall that a report was considered at the meeting of this Committee on 3rd August about the Aylesbury Vale draft Local Plan. It was noted

that the proposed redistribution of 12,000 houses from Wycombe and Chiltern and South Bucks districts to the north of Buckinghamshire would have implications for the housing market in the south of the County which is under severe pressure and already is one of the least affordable areas in the country. As a result representations were made that Aylesbury Vale Council should robustly challenge the level of unmet housing need that it is being asked to accommodate from Chiltern/South Bucks.

- 5.19 Under the circumstances it is not considered that the Green Belt Preferred Options have been identified in a robust way for a number of reasons but the most important one in this context is that the amount of land to be released from the Green Belt appears to have been predetermined rather than objectively assessed. Having decided that there are the exceptional circumstances required to release Green Belt land for housing a much larger amount could be identified if sufficient weight was given to meeting local needs where they arise.

Failure to Consider the Proposed Northern Expansion

- 5.20 As explained above this Council made representations to Chiltern and South Bucks Issues and Option consultation that there should be an urban expansion of Slough in the form of a new 'Garden Suburb' which will help to meet the housing needs in the area. It has also raised this in Duty to Cooperate meetings.
- 5.21 As a result it would be expected that the Councils would have given this proper consideration, particularly since it could form part of one of the Spatial Options for the plan which they identified at the Issues and Options stage.
- 5.22 Unfortunately it appears that the Chiltern and South Bucks Joint Committee approved the Green Belt Preferred Options without first considering any of the comments that had been made to the previous consultation exercise which including our representations about the northern expansion.
- 5.23 A report on the results of public consultation has now been published on the website but this was after the Joint Committee made its decision and this as still not been presented to Members.
- 5.24 Even if the Members had the benefit of seeing the report it would not have provided them with very much of an explanation as to why the northern expansion of Slough is not currently being considered in the Joint Plan. The introduction to report mentions that Slough Borough Council was in support of a potential extension of Slough but there is no further consideration of this apart from a single paragraph alongside our representations in the report which states:

"Independent analysis of the housing market area functional linkages concludes that the "best fit" for Chiltern and South Bucks Local Plan area is with the rest of Buckinghamshire. Best fit groupings do not change functional housing market

relationships and they will continue to be considered through the plan making process.”

- 5.25 It is not entirely clear what this response means but it is assumed that it is saying that the Joint Plan does not need to accommodate an urban extension of Slough to meet Slough's needs because it is not in the same Housing Market Area. This misses the point that our representations clearly stated that urban extension of Slough in the form of a new 'Garden Suburb' is considered to be the most sustainable way of meeting South Bucks and Chiltern's housing needs. This means that the argument about the Housing Market Area is irrelevant.
- 5.26 Our representations went on to say that if the Joint Plan produces a strategy that can meet its needs without having a northern expansion of Slough it is considered that this option should still be considered to meet Slough's needs. The response appears to suggest that this will be considered through the plan making process but does not explain how this will be done.
- 5.27 As a result it is not considered that Chiltern and South Bucks District Councils have yet given proper consideration to the representations that we have made to the Local Plan or matters that we have raised through the Duty to Cooperate.
- 5.28 The proposal to have a northern expansion of Slough has not been properly considered as part of the Green Belt Preferred Options work. Following a request from Chiltern and South Bucks Councils we provided them with a map showing the area of search. The Green Belt Development Options Appraisal lists three areas identified by Slough Borough Council through the Issues and Options consultation which effectively make up the area of search for the northern expansion of Slough (refs 4.337-9) as rejected for further consideration because they were 'recommended to not be considered further under the draft Green Belt Assessment Part 2' (Section 4) .
- 5.29 A table in the Draft Green Belt Assessment Part 2 document then states that these areas are recommended to not be considered further as the full site areas do not 'as a whole' have permanent defensible boundaries (Table 5 and Figure 5b). The analysis (Appendix 6, Volumes 3 and 7, classified as 'Section 4 Areas: Site Nominations) states that this causes them to be judged as failing the part 1 assessment.
- 5.30 Two smaller areas which make up the wider area of search for the northern expansion of Slough are also assessed in the Green Belt Assessment Part 2. These are the area at George Green, west of Wexham park hospital and at Middlegreen, north of Slough (Appendix 5, Vol 2, refs 2.29 and 2.30 respectively, classified as 'Reg. 18 Built Area Extension Options').
- 5.31 The first site passes the test of having a permanent and defensible boundary but fails on the other Green Belt tests because it is contiguous with the Slough built area and because it forms a vital gap between Slough and George Green.

- 5.32 The second site fails the first test because it is not possible to identify a boundary that is permanent and defensible. This means that it is not taken forward for further testing.
- 5.33 The way in which these sites have been assessed highlights the flaws in the methodology which has been used which means that the Green Belt Assessment has not produced very meaningful results. This is because both the assessment criteria and the application of a sequential approach which applies a hierarchy to each of the criteria is not appropriate.
- 5.34 Firstly the methodology appears to assess whether a site in its entirety currently has a strong permanent boundary such as road, railway or river. If a site doesn't have this it is not taken forward to the next stage on the grounds that it does not meet the NPPF requirements.
- 5.35 There is, however, nothing in the NPPF to support the idea that sites must currently have permanent or defensible boundaries in order to be released from the Green Belt. The development of a site will automatically create a new boundary and so it is irrelevant to consider what is there at present as the criteria as the key site selection criteria.
- 5.36 Secondly the methodology assesses sites against the five purposes of having Green Belts that are set out in the NPPF. These are not necessarily helpful in assessing the relative merit of individual sites. For example the first purpose is to "check the unrestricted sprawl of large built up areas". This means that the development of any site on the edge of a town is automatically considered to have more harm to the Green Belt than the development of an isolated site in the middle of the countryside. This clearly can't be the case. At the same time it is assumed that development on the edge of settlements constitutes "sprawl" which need not be the case if it is properly planned. This means that the methodology has an in built bias against urban extensions of large settlements such as Slough even though they may be more sustainable.
- 5.37 Finally the methodology attempts to assess whether there are exceptional circumstances to justify releasing land from the Green Belt without any reference to the scale of need that there is for housing or how it would fit in with the as yet undecided Spatial Strategy for the Local Plan.
- 5.38 The consultation document requests that if alternative options are to be put forward, those putting them forward should first consider the Green Belt Development Options Appraisal (and more detailed related studies where relevant) on the Councils' websites to see if the option has already been considered and if so to understand why it has been rejected.

- 5.39 If the alternative option is still to be promoted and has already been considered and rejected then the Councils request that the reasons for rejection are fully addressed as part of consultation response.
- 3.40 For all of the reasons highlighted above it is not considered that the proposal for a northern expansion of Slough or for selected growth around Taplow, Langley and Iver stations have been properly assessed. As a result it is proposed that Chiltern and South Bucks should be asked to reconsider these proposals using more appropriate selection criteria.
- 5.38 This criteria should be capable of giving proper weight to all aspects of Green Belt policy. It should also be capable of taking into account of important non Green Belt factors such as the emerging overall spatial strategy for the Plan, the extent and distribution of housing need, the impact upon affordability, accessibility and sustainability.
- 5.39 The methodology should also be capable of robustly testing the assumption that 5,800 houses should be built in Aylesbury Vale.
- 5.40 Failure to meet housing needs where they are arising will put more pressure upon the local housing market and make property even less affordable to local people.

6 Conclusion

- 6.1 It is considered that representations should be made to Chiltern and South Bucks Councils that proper consideration should be given to the northern expansion of Slough, with selected growth around Taplow, Burnham and Iver stations in order to meet housing needs arising in the area. Failure to do this will put even more pressure upon the local housing market and make it even less affordable.
- 6.2 This issue will also have to be raised through the Duty to Cooperate which is intended to help resolve strategic cross boundary planning issues.

7 Background Papers

Previous Planning Committee reports on the Chiltern and South Bucks Local Plan

South Bucks and Chiltern Consultation Documents:
Green Belt Preferred Options Consultation Document
Draft Green Belt Assessment Part Two
Green Belt Development Options appraisal

8 Appendices