

## **SLOUGH BOROUGH COUNCIL**

**REPORT TO:** Planning Committee      **DATE:** 5th September 2018

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**WARD(S):** ALL

### **PART I** **FOR INFORMATION**

#### **REVISED NATIONAL PLANNING POLICY FRAMEWORK (NPPF)**

1. **Purpose of Report**

The purpose of this report is to inform Members about the revisions to the National Planning Policy Framework (NPPF) and highlight what the implications of these changes could have for Local Planning in Slough.

2. **Recommendation(s)/Proposed Action**

The Committee is requested to resolve that the report be noted

3. **The Slough Joint Wellbeing Strategy, the JSNA and the Five Year Plan**  
3a. **Slough Joint Wellbeing Strategy Priorities**

This will have an impact upon the following SJWS priorities:

4. Housing

3b. **Five Year Plan Outcomes**

The new National Planning Policy Framework will help deliver the following Five Year Plan outcomes:

- Slough will be an attractive place where people choose to live, work and visit.
- Our residents will have access to good quality homes.
- Slough will attract, retain and grow businesses and investment to provide jobs and opportunities for our residents

4. **Other Implications**

(a) **Financial**

The proposed work can be met from existing budgets.

(b) **Risk Management**

Recommendation	Risk/Threat/Opportunity	Mitigation(s)
That the revisions to the National Planning Policy Framework be noted and incorporated into the review of the Local Plan.	Failure to take account of the revisions to the National Planning Policy Framework could result in the Local Plan being unsound.	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

(e) Workforce

There are no specific workforce implications arising from this report.

5. **Supporting Information**

**Introduction**

- 5.1 The purpose of this report is to provide an update on the revisions to the National Planning Policy Framework (NPPF) which were published in July and highlight the implications that this may have for the preparation of the Slough Local Plan. The Amendments Sheet for the report to the last Committee explained the implications for the 5 year land supply calculations and the forthcoming report on the Annual Monitoring Report will include a review of policies.
- 5.2 The National Planning Policy Framework (NPPF) sets out the Governments planning policies for England and how these should be applied. Further details as to how the policies should be interpreted and implemented are set out in Planning Policy Practice Guidance which is also produced by the Government on an on-going basis.
- 5.3 The Framework was first introduced in 2012 by bringing together around 1,000 pages of national planning policy and guidance into a single document. This is the first major update of the National Planning Policy Framework which has taken place since then.
- 5.4 The Government published Draft changes to the NPPF for consultation which were reported to this Committee in April. Council's formal responses, which were generally supportive, were sent to the MHCLG.
- 5.5 The Government has made a number of further changes to the Framework as a result of the response to consultation or changing circumstances.
- 5.6 In order to assess what the implications are for the review of the Local Plan it is helpful to look at how it could affect the overall strategy and the five key elements which make up the "emerging" Preferred Spatial Strategy.

**The Overall Strategy**

- 5.7 One of the more helpful changes to the NPPF is that the test of soundness now only requires plans to justify having "*an appropriate strategy*" rather than "*the most appropriate strategy*" which was required before (para. 35).

- 5.8 The overall strategy for the review of the Local Plan for Slough is to deliver balanced, cohesive growth which meets local needs as far as is possible given all of the constraints to development.
- 5.9 The revised NPPF states that local plans *should positively seek opportunities to meet development needs in their area and as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas* (para.11).
- 5.10 The NPPF now requires local housing needs assessments to be *conducted using the using the standard method in national planning guidance* (para. 60). This standard methodology involves setting the baseline using National Household Projections, applying an adjustment to take account of market signals using the local affordability ratio. The application of this methodology would reduce Slough's requirement slightly from an average of 927 to 912 a year but would not change the overall objective of trying to meet this scale of need within the Borough or as close as possible to where the need arises.
- 5.11 For employment uses, the NPPF states that *"planning policies and decisions should recognise and address the specific locational requirements of different sectors including storage and distribution operations at a variety of scales and in suitably accessible locations"* (para. 82).
- 5.12 One of the Local Plan Objectives is to create 15,000 additional jobs but none of the options involved creating additional land for warehousing apart from some Heathrow related development at Poyle. The Local Plan has allocated sites for employment growth in the town centre for offices and one of the principles of Slough's emerging Preferred Strategy is the protection of existing employment land.
- 5.13 The main conclusion from the Issues and Options consultation is, however, that there is no reasonable option that can accommodate the full identified need for housing and employment land within the Borough.
- 5.14 The NPPF states that when determining the minimum number of homes needed *"any needs that cannot be met within neighbouring areas should be taken into account in establishing the amount of housing to be planned for"* (para. 60). It recommends that *joint working should help to determine where additional infrastructure is necessary and whether development needs that cannot be met wholly within a particular plan area could be met* (para. 26).
- 5.15 In order to progress some of the key elements of the Local Plan we are working jointly with South Bucks, Chiltern and Windsor & Maidenhead to produce a Growth Study to help determine where unmet needs could be met. We are also working with the authorities in the Heathrow Strategic Planning Group (HSPG) to determine where the infrastructure and development associated with the proposed third runway at Heathrow should go.
- 5.16 As a result it is not considered that the revisions to the NPPF will have any significant implications for the overall strategy for the review of the Local Plan for Slough in terms of the scale of the development that is being planned for and the ability to plan jointly for unmet needs being met in adjoining areas.
- 5.17 The Review of the Local Plan has an "emerging" Preferred Spatial Strategy which has the following five key elements:

**Delivering** major comprehensive redevelopment within the “Centre of Slough”;  
**Selecting** other key locations for appropriate development;  
**Protecting** the built and natural environment of Slough including the suburbs;  
**Accommodating** the proposed third runway at Heathrow and mitigating the impact;  
**Promoting** the northern expansion of Slough in the form of a “Garden Suburb”.

5.18 The implications of the revisions to the NPPF for each of these are considered below.

**Delivering major comprehensive redevelopment within the “Centre of Slough”**

- 5.19 One of the key objectives of the NPPF is to ensure the vitality of town centres. It states that “*planning policies and decisions should support the role that town centres play at the heart of local communities by taking a positive approach to their growth, management and adaptation*” (para. 85).
- 5.20 It also states that “*plans should allow them to diversify in a way that can respond to rapid changes in the retail and leisure industries and allow a suitable mix of uses including housing*” and “*should allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead*” (para. 85).
- 5.21 The Preferred Spatial Strategy has allocated sites for retail, leisure and employment uses as part of the comprehensive redevelopment of the town centre and will protect these uses through the application of *the sequential test for planning applications for main town centre uses* (para. 86).
- 5.22 The revised NPPF states that local plans should ensure that “*opportunities from existing or proposed transport infrastructure, and changing transport technology and usage are realised – for example in relation to the scale, location or density of development that can be accommodated*” (para. 102).
- 5.23 It also states that “*Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes*” (para. 103).
- 5.24 A PTAL (public transport accessibility) study for Slough shows that the area focused upon the railway station is the most accessible area in the Borough and this is likely to increase with the introduction of the Elizabeth Line service and proposed western rail connection to Heathrow.
- 5.25 The NPPF states that policies should “*promote a significant uplift in density standards in town and city centres and other locations well served by public transport*” (para. 137).
- 5.26 The NPPF states that Local Planning Authorities should “*take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs*” (para. 119). As part of the Spatial Strategy we have identified 24 Strategic Housing sites which could accommodate around 7,000 new dwellings. Nineteen of these sites are in the centre of Slough. In order to accommodate this number of dwellings many of the sites will have a significant uplift in density.
- 5.27 In order to accommodate this scale of development it is important that it is comprehensively planned and well designed.

- 5.28 The NPPF states that “*Local Planning authorities should refuse applications which they consider fail to make efficient use of land*” (para. 123). It also states that “*planning permission should be refused for development of poor quality that fails to take account of the opportunities available for improving the character and quality of an area* (para. 130). It also states that plans should “*set out a clear design vision and expectation so that applicants have as much certainty as possible about what is likely to be acceptable*” (para. 125).
- 5.29 As a result we will prepare design guidance for the centre of Slough which will include guidance about tall buildings and dense development.
- 5.30 The NPPF promotes healthy and safe communities by “*promoting social interaction through mixed uses, street layouts that allow easy pedestrian and cycle connections and active street frontages and the use of clear and legible pedestrian routes and high quality public space which will encourage the active continual use of public area* (para. 91).
- 5.31 One of the features of expanding the Centre of Slough is to create attractive linkages between new residential areas and the town centre facilities – in particular better walking and cycling routes plus space for better public transport services. We will be bringing a report to Committee identifying where all the key linkages are in the town so that they can be protected and enhanced.
- 5.32 Overall it is considered that the revised NPPF is fully supportive of the Council’s proposal to deliver major comprehensive redevelopment within the “Centre of Slough”;

#### **Selecting other key locations for appropriate development**

##### Langley Centre; Cippenham Strip (Bath Road) and Chalvey

- 5.33 These three areas have been included in the Spatial Strategy to assist regeneration and housing supply in sustainable locations.
- 5.34 Under the banner of ‘making effective use of land’ there is now specific emphasis in the NPPF (para. 119) on planning authorities taking a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs including brownfield sites and land in public ownership plus use, where necessary, compulsory purchase powers. This supports the spatial strategy of promoting major redevelopment of key areas, some of which include Council owned sites and renewal of selected Council housing estates. This applies to Chalvey in particular.
- 5.35 There is also a specific reference (para. 93) to planning policies and decisions considering the social, economic and social benefits of estate regeneration, and planning authorities using their powers to help deliver estate regeneration to a high standard.
- 5.36 ‘Achieving appropriate densities’ is now a specific section in the NPPF to make efficient use of land. It includes reference (para. 123) to use of minimum densities for town centres and locations well served by public transport. This supports the spatial strategy of focussing development at Langley Centre, which is next to Langley Station, plus allowing housing density above the average for the surrounding area.
- 5.37 The NPPF expects Council’s to promote development of a good mix of sites in particular small and medium sized sites (para. 68). In particular it asks Council’s to

identify land to accommodate at least 10% of their housing requirement on sites of one hectare or under. This will complement the spatial strategy of focussing on strategic areas for redevelopment. Housing supply in Slough has always included a large number of small and medium sized sites.

### **Protecting the built and natural environment of Slough including the suburbs**

- 5.38 One of the three elements of sustainability identified in the NPPF is the environmental objective which seeks to *contribute to protecting and enhancing our natural, built and historic environment ; including making effective use of land, helping to improve biodiversity, using natural resources prudently ...and adapting to climate change* (para. 8).
- 5.39 Because of the nature of Slough, with its densely developed town centre and industrial areas, most of the valuable environmental areas within the Borough are within the suburbs.
- 5.40 One of the Local Plan Objectives is to ensure that residential neighbourhoods retain a distinct sense of place and one of the distinctive qualities of the suburbs is the amount of greenery that they have compared to other parts of the Borough.
- 5.41 The NPPF states that *“Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area”* (para. 70).
- 5.42 The NPPF also states that *“access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities”* (para. 96).
- 5.43 Slough has a shortage of open space. Virtually all of the parks, open spaces, sports pitch and play areas are located within or adjacent to the suburban areas. As a result they contribute to the character and amenities of the residential areas.
- 5.44 The NPPF states that existing open space should not be built upon unless it is *“surplus to requirements”* or *“would be replaced by better provision in terms of quantity and quality in a suitable location”* (para. 97). In order to help resolve future problems we will be commissioning a new Open Space Study as part of the evidence for the Local Plan which will help to establish how and where mitigation could best be provided.
- 5.45 Part of the social objective within the NPPF is to *support strong, vibrant and healthy communities* (para. 8). Once again most of Slough’s diverse communities are within the suburban areas.
- 5.46 Within the overall objective of significantly boosting the supply of homes, the NPPF requires the needs of groups with specific housing requirements are addressed (para. 59). One of these groups is families with children (para. 60). The vast majority of the stock of family housing within the Borough is within the suburban areas and the majority of the planned new development is likely to be flats. As a result there is a need to protect the existing family housing from redevelopment or change of use.
- 5.47 The NPPF states that plans should contain policies to optimise the use of land and meet as much of the identified need for housing as possible (para. 123).

- 5.48 The NPPF states that “*significant development should be focused on locations which are, or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes*” (para. 103).
- 5.49 The Public Transport Accessibility Level (PTAL) study for Slough shows that the suburban areas are not very accessible.
- 5.50 The NPPF recognises that areas should be built at different densities. Whilst it recommends a significant uplift in the average density of residential development in city and town centres, it only suggests that the use of minimum density standards should be considered for other parts of the plan area (para. 123).
- 5.51 The NPPF states that *Planning policies should play an active role in guiding development towards sustainable solutions (and) in doing so should take local circumstances into account to reflect the character, needs and opportunities of each area (para. 9).*
- 5.52 Taking all of these factors into account it is considered that the revised NPPF provides sufficient justification for the Council to continue to protect the built and natural environment of Slough including the suburbs.

**Accommodating the proposed third runway at Heathrow and mitigating the impact**

- 5.53 The NPPF (para. 104) states that planning policies should “*provide for large scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy.*” It also specifically states that they should “*recognise the importance of maintaining a national network of general aviation airfields and their need to adapt over time.*”
- 5.54 The NPPF does not contain specific policies for nationally significant infrastructure but states that these are to be determined in accordance with the relevant National Policy Statement (NPS). It also states that National Planning Policy Statements “*may be material considerations in preparing plans*” (para. 5).
- 5.55 In June the Government published the Airports National Policy Statement which promotes a new north-west runway at Heathrow. This will be determined through the Development Consent Order (DCO) process for nationally strategic infrastructure projects rather than the Local Plan.
- 5.56 There will, however, be additional development associated with the expansion of the airport that will not be included in the DCO application which will have to be brought forward through the Local Plan process.
- 5.57 As a result we have been developing a Master Plan for the Colnbrook and Poyle area which will show how the third runway and associated development could be accommodated which will also specify what mitigation measures will be required. This will take account of all of the requirements set out in the revised NPPF.
- 5.58 In the meantime it is important that piecemeal or premature development does not take place within the Colnbrook and Poyle area which could prejudice the proper comprehensive planning of the area.

- 5.59 Overall there are no significant implications from the revision of the NPPF for the Local Plan strategy for accommodating the proposed third runway at Heathrow.

**Promoting the Northern Expansion of Slough in the form of a “Garden Suburb”**

- 5.60 The NPPF para. 72 states that *the supply of large numbers of new homes can often be best achieved through planning for larger scale developments such as new settlements or significant extensions to existing villages or towns*. It also states that *“working with the support of their communities and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations where this can help to meet identified needs in a sustainable way.”*
- 5.61 Because of the built up nature of Slough, the Council has not been able to identify land suitable for a significant urban extension within the Borough boundary. As a result the Council has identified land adjoining the Borough in South Bucks District as the location for the proposed Northern Expansion of Slough. This will also help balance the local housing market by providing the family housing that cannot be provided in locations such as the town centre.
- 5.62 The NPPF states that urban extensions should be planned in a sustainable way and *“should consider the opportunities by planned investment in infrastructure, the area’s economic potential and the scope for net environmental gains (para. 72).*
- 5.63 The proposed Northern Extension would meet all of these requirements. In addition to having access to all of the existing facilities in Slough it would be focused around the new Elizabeth Line station at Langley which forms part of the multi billion pound Crossrail investment in public transport. It would also be directly linked to and support the proposed third runway at Heathrow which is also a multi billion pound investment that will provide a major boost to the areas economic potential. By being comprehensively planned as a “garden suburb” it also has the scope for net environmental benefits.
- 5.64 The major planning policy obstacle to the delivery of the proposed Northern Extension is the fact that the land is within the Green Belt. The NPPF continues to attach great importance to the Green Belt, the fundamental aim of which is to prevent urban sprawl by keeping land permanently open (para. 133).
- 5.65 The NPPF reiterates that *once established Green Belt boundaries should only be altered in exceptional circumstances (para. 136).*
- 5.66 The revised NPPF now helpfully sets out a procedure that can be followed in order to release land from the Green Belt for developments such as the Northern Expansion, *“where exceptional circumstances are fully evidenced and justified”* through the preparation of a Local Plan (para. 136).
- 5.67 The NPPF states that in order to conclude that “exceptional circumstances” exist to justify changes to Green Belt boundaries, the plan making authority should be able to demonstrate that it has examined *fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of the plan which will take account whether it:*
- a) *Makes as much use as possible of suitable brownfield sites and underutilised land;*

- b) *Optimises the density of development, including whether policies promote a significant uplift in density standards in town and city centres and other locations well served by public transport; and*
- c) *Has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground (para. 137).*

- 5.68 As explained above, the Issues and Options process has demonstrated that there is no reasonable option, or combination of options that can accommodate all of Slough's housing and employment needs within the urban area or within the Borough boundary.
- 5.69 The Preferred Spatial Strategy makes as much use as possible of suitable brownfield land and promotes development with a significant uplift in density in locations such as centre of Slough.
- 5.70 The Council is working with South Bucks, Chiltern and Windsor & Maidenhead on a Joint Growth Study which will test whether or not the Northern Expansion is the most sustainable option for meeting un met housing needs in the area in accordance with the revised NPPF which states that the release of Green Belt land should create "*sustainable patterns of development*" (para. 138).
- 5.71 The results of the Growth Study will inform future Local Plans which will have to comply with para. 60 of the revised NPPF which states that "*in addition to the local needs housing figure, any needs that cannot be met within neighbouring areas should be taken into account in establishing the amount of housing planned for.*" As a result it is considered that the publication of the revised NPPF is helpful in setting out how the Council's promotion the Northern Expansion of Slough in the form of a "Garden Suburb" can be progressed.

## 6 **Conclusions**

- 6.1 The publication of the revised National Planning Policy Framework sets out the basis upon which Local Plans should be prepared. This report has assessed the Council's "emerging" Preferred Spatial Strategy against the new Framework and concluded that it is generally in conformity with Government policy.

## 7 **Background Papers**

National Planning Policy Framework – Ministry of Housing Communities & Local Government (July 2018).