

Appendix 1: PROPOSED RELEASE OF GREEN BELT LAND FOR FAMILY HOUSING

A1. Introduction

A1.1 The text below is the outline draft for the first part of the Consultation document referred to in the Cabinet Report. The final document layout and appearance will coordinate with the Spatial Strategy Consultation document released last year.

A1.2 The section here sets out the context and purpose of the consultation. The second part, yet to be finalised, will contain site specific details such as initial site assessment criteria to inform their suitability. The decision to include the incomplete text was made by the Local Plan Board in August, so the team can progress with agreement in principle ahead of the more detailed proposals being available.

A1.3 The Consultation will include a set of questions to guide responses. These will be about:

- Site selection methodology
- Individual sites
- Any other Green Belt sites
- Alternatives to Green Belt releases
- Whether there are “exceptional circumstances” to justify the loss of Green Belt

A1.4 Formal representations require minimum contact details to show they are legitimate and enable them to be followed up, but general comments can be submitted. For more detail please see the Cabinet Report.

A2 Draft text

PROPOSED RELEASE OF GREEN BELT LAND FOR FAMILY HOUSING

FOREWARD

CONTENTS

1 About this Consultation

1.1 The Council is consulting people about the proposal to release some sites in Slough from the Green Belt so that they can be developed for family housing. As a result we would like your views as to whether the ten sites that we have identified are suitable for housing.

1.2 It is recognised that Green Belt boundaries should be permanent and so we would also like your views as to whether the necessary “exceptional circumstances” exist to justify building upon Green Bet land.

1.3 It should be noted that this consultation is only about the possible release of land for housing. Any proposals for the use of Green Belt land for any other purpose will be considered at a later date as part of the Local Plan process.

1.4 The consultation period runs for 6 weeks from ??? to ???. All responses must be received before the close of the consultation at 5pm.

1.5 If possible responses should be submitted using the online form at www.slough.citizenspace.com

1.6 Those not using the online form should submit representations:

- Via email to planningpolicy@slough.gov.uk
- Via post to: Planning Policy (GB), Slough Borough Council, Observatory House, 25 Windsor Road, Slough SL1 2EL

1.7 If you have any queries relating to the consultation please contact the Planning Policy team using the contact details above.

2 Why are we consulting about releasing Green Belt for family housing?

2.1 All Council’s have a duty to produce a Local Plan which contains proposals and policies for the future spatial planning of the area. We are in the process of producing one for Slough which will cover the period up to 2040.

2.2 One of the Objectives of the Local Plan is “*to meet the Objectively Assessed Housing Need of 893 dwellings within the Borough or as close as possible to where the need arises within a balanced housing market*” Although the precise number may vary (currently 864) it is clear that there is a genuine need for more housing in Slough.

2.3 All of the work that we have done on the Local Plan through the *Issues and Options* and *Proposed Spatial Strategy* consultations has shown that there is a shortage of land for residential development in Slough and a shortage of sites

suitable for new family housing in particular.

2.4 As a result we have been trying to promote “*the cross border expansion of Slough to meet unmet housing needs.*” In practise this would involve the development of Green Belt land in adjacent Council areas. The Planning Process places a ‘Duty to Co-operate’ on all parties involved to address the matter.

2.5 As part of this process we have to make sure that we have “left no stone unturned ” in our search for deliverable housing sites within the Borough. This means that we have to first consider releasing Green Belt sites in Slough for housing before asking our neighbours to meet some of Slough’s need.

2.6 One of the advantages of this is that greenfield sites have more ‘financial viability’ to provide lower density family housing with a higher proportion of affordable housing than brownfield sites can deliver. Because of the importance of Green Belt, Sites can only be released from the Green Belt through the Local Plan process which is explained below.

3 The Local Plan for Slough

3.1 The starting point for the preparation of the Local Plan for Slough (2016 – 2040) was the *Issues and Options* consultation which took place in 2017. This identified a number of options for development. One of these was Option H: “The release of Green Belt land for housing”. There were a number of objections to the principle of the loss of Green Belt land and to the ten possible sites that were identified in the consultation document.

3.2 The main conclusion from the consultation was that there were no reasonable options, or combination of options which could accommodate all of Slough’s housing and employment needs within the Borough.

3.3 An “emerging” proposed Spatial Strategy was agreed in 2018 which took this into account. One of the main focuses of this was how the Local Plan could accommodate the proposed expansion of Heathrow with a third runway as this had a significant impact on land use in Colnbrook and Poyle in the east of the Borough.

3.4 Once it became clear that the proposed third runway was not going to go ahead in the short to medium term, a revised *Proposed Spatial Strategy* was produced. This was the subject of public consultation in November 2020.

3.5 This proposed to deliver most of the necessary growth through the major comprehensive redevelopment of the “centre of Slough”. Another component of the Strategy involved “*selecting other key locations for appropriate sustainable development.*” Part of this could involve green field or Green Belt land being released for housing.

3.6 The same ten possible sites from the Issues and Options document were identified for consultation. No details or assessments were included at this stage and it was made clear that further consultation would have to take place before any proposals could be made to release sites from the Green Belt for housing.

3.7 It was also suggested that any decision would have to take account of the results of Part 2 of the Wider Area Growth Study which is assessing the potential for developing major sites for housing in and around Slough.

3.8 One of the questions asked in the Spatial Strategy consultation was “*If you think that more homes should be built in Slough to meet local needs where should it be?*”. There was a range of responses but only around 10% of respondents thought that Green Belt sites on the edge of Slough should be released for housing. There were also objections to the specific sites that were identified in the consultation. At the same time only around 40% of respondents thought it was appropriate to plan for a shortfall of housing in Slough and promote the cross border expansion instead.

4 Why is there a need for more housing in Slough?

4.1 The Government requires Local Plans to make sufficient provision for housing (including affordable housing), employment, retail, leisure and other commercial development. (NPPF para 20) to meet the needs of the population over the long term.

4.2 The Government puts particular emphasis upon meeting housing needs and has produced a “standard” methodology for calculating what they are in each Local Plan area using household projections and an ‘affordability ratio’. This produces a need for an average of 864 dwellings a year in Slough.

4.3 The Spatial Strategy Consultation Document (November 2020) identified that the proposed Strategy could result in a shortfall of 5,000 homes in Slough. This was based upon a slightly higher annual need figure of 893 and the supply of housing sites identified in April 2020.

4.4 The most recent annual housing figures have reduced need in Slough slightly, and some new sites have been identified, but the rate of house building has remained low with just 501 completions last year. In addition, as a result of responses to the public consultation, it has been acknowledged that the end of the Local Plan period needs to be extended from 2036 to 2040. This means that another four years supply of housing has to be found.

4.5 The Housing Trajectory includes sites that have been built in the first five years of the plan, sites with planning permission, allocations and sites that could potentially be developed for residential use. The latest version identifies around 12,000 dwellings mostly in flatted development. This is well below the number

needed to meet the objectively assessed housing need over the Local Plan period up to 2040 as shown in Table x below.

Table x Housing Supply Calculations

[INSERT MOST UP TO DATE CALCULATION before publication]

4.6 As a result it is clear that there will continue to be both a shortfall of housing supply and the provision of family housing in Slough over the Plan period which requires us to consider the release of Green Belt land to try to reduce this.

5 Why is there a need for more family housing in Slough?

5.1 There is currently a mismatch between the type of housing that is needed to meet the needs of Slough residents and the type of new housing that is being built. This is resulting in overcrowding, people living in unsuitable accommodation and families having to move out of the Borough. As a result it is difficult to create a stable balanced community and the Local Plan Objective of enabling people to be able to “stay” in Slough if they want to. .

5.2 In addition to meeting the overall numbers, paragraph 62 of the NPPF states that “the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. In order to do this a Local Housing Needs Assessment was produced by GL Hearn in October 2019 on behalf of Windsor & Maidenhead, South Bucks and Slough.

5.3 This showed that for market housing in Slough, the overwhelming requirement was for larger units with a need of 57% of the supply as 3 bedroomed houses and 20% as 4 or more bedroomed houses. The need for larger affordable housing for rent was not as high, but still constituted 29%.

5.4 Monitoring shows that around 80% of the dwellings built in Slough in the first five years of the Plan period were flats. Looking forward only around 6% of dwellings with planning permission are for houses..

5.5 This is reflected in research which has shown that the average size of residential properties built in Slough over the last three years is 68m² which is almost half the size of those built in South Bucks which is 132m². This is despite the fact that the average household size in Slough (2.8) is higher than South Bucks (2.6) It also helps to explain why Slough has some of the highest levels of overcrowding with each person having on average 27.2 m² of space compared to an average of 36.5m² in other towns and cities.

5.6 In order to address this problem the Core Strategy and proposed Spatial Strategy seeks to protect the existing stock of family accommodation by preventing the redevelopment or subdivision of housing for flats. This will not meet demand and so there needs to be an increase in the supply of new family homes.

6 Is there a need for more affordable housing in Slough?

6.1 Slough has a significant shortage of affordable housing. In March 2021 there were 1,911 households on the Council's Waiting List. Whilst only around 10% of these need 4 or 5 bedroomed houses, there is an extreme shortage of these larger homes with very few becoming available to rent. Indeed in 2020/21 only four units of this size were able to be let to new tenants which means that these large households can have up to a 5 year wait to get the accommodation that they need.

6.2 Paragraph 34 of the NPPF states that Local Plans should set out the types and level of affordable housing that is needed. Core Policy 4 of the Core Strategy states that all sites with 15 or more dwellings will be required to provide between 30% and 40% of the dwellings as social rented along with other forms of affordable housing. It has not, however, been possible to obtain this level of affordable housing on sites because development will only proceed if it is viability and a developer can make a reasonable return on investment. As a result we have had to grant planning permission on some brownfield sites which have not provided any affordable housing at all.

6.3 This has resulted in an average of around 50 affordable units a year being provided during the first five years of the Local Plan period. Previous peak building rates for affordable housing has happened when there has been a supply of greenfield land.

6.4 Viability is much less of an issues when developing greenfield sites because they do not have the same existing use value and the cost of building can be lower than on previously developed sites. As a result it would be possible to obtain a much higher proportion of affordable housing upon any sites that are released from the Green Belt . And in addition there is more opportunity for those homes to be family housing.

6.5 The NPPF also requires plans to identify land for self or custom build homes. The Self Build Register in Slough currently has requests for a building plot from over 200 people. It is not possible to allocate plots for self build within flatted schemes and so the only opportunity for doing this is likely to be on greenfield sites where houses rather than flats are being built. More recent Government Policy is requiring the provision of a new type of affordable housing called 'First Homes'. The initial implications of that will also need to be assessed and integrated.

6.6 As a result it can be seen that there is a need for a more balance housing market in Slough which meets one of the main aims of the Local Plan which is to make it a place where people want to "work, rest, play and stay".

7 Are there any alternatives to releasing Green Belt land for housing?

7.1 Paragraph 141 of the NPPF states that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.

7.2 As a result it is necessary to demonstrate whether the Local Plan strategy:

- a) Makes as much use as possible of suitable brownfield sites and underutilised land;
- b) Optimises the density of development in line with the policies in chapter 11 of the Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport;
- c) Has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development.,

7.3 These matters have been considered through the Issues and Options consultation (2017) and the consultation on the Spatial Strategy (2020). The key conclusion from the Issues and Options consultation was that there was no reasonable option, or combination of options that could accommodate all of Slough's needs within the Borough boundary.

7.4 Taking this into account the proposed Spatial Strategy has the following key components:

- ***Delivering major comprehensive redevelopment within the “Centre of Slough”***
- ***Selecting*** other key locations for appropriate *sustainable* development;
- ***Enhancing*** our distinct suburbs, vibrant neighbourhood centres and environmental assets;
- ***Protecting*** the “Strategic Gap” between Slough and Greater London;
- ***Promoting*** the cross border expansion of Slough to meet unmet housing needs.

7.5 A large proportion of the proposed growth will take place in the Centre of Slough. The rest of the town is already highly developed. The need to retain Existing Business Areas means that it has not been possible to identify very many selected key locations for major housing development. There is a shortage of public open space and so it is not proposed to identify any more of this for development.

7.6 The only other scope for major new housing would be to redevelop the suburban housing areas. The Spatial Strategy does not propose to do this because of the need to promote healthy, inclusive and safe communities and retain the existing stock of family housing. The “Protecting the Suburbs” report (2020) showed why it was not practical, viable, sustainable or desirable to allow any of the family housing to be lost.

7.7 As a result it can be demonstrated that there is no suitable underutilised major brownfield land in Slough that hasn’t already been identified for housing and optimum use is being made of the existing housing stock.

7.8 Paragraph 125 of the NPPF states that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. As a result it states that Local Plans should include minimum density standards for town centres which should seek a significant uplift in the average density of residential development.

7.9 The Core Strategy sets out an indicative density range for different location in Slough. This states that densities should be between 35 and 55 dwellings per hectare in the suburban areas, between 40 and 75 dwellings per hectare in the urban areas and above 70 dwellings per hectare in the town centre.

7.10 Development within the Centre of Slough has significantly exceeded this density with some schemes up to ten times higher than the minimum. Whilst these very high densities have delivered the maximum number of dwellings possible they have not produced the range of housing that is required in Slough.

7.11 Part of the Spatial Strategy involves promoting the cross border expansion of Slough to meet unmet housing needs. Discussions with neighbouring authorities about meeting some of Slough’s unmet housing need have not so far been very successful. One of the reasons is that this would also involve releasing Green Belt land for housing.

7.12 As a result it can be seen that the proposal to release Green Belt land in Slough for family housing has been brought forward as a last resort after making as much use as possible of brownfield sites, optimising the density of development and exploring the possibility of building outside of the Borough.

8 How have the possible housing sites been selected?

8.1 The ten sites that could possibly be released from the Green Belt were first identified in the Issues and Options consultation document (2017).

8.2 This noted that the largest area of Green Belt in the Borough is in Colnbrook

and Poyle. This was not considered suitable for new housing because it is subject to a number of environmental constraints and the Government announced its support for a third runway in this location which makes it even less appropriate for housing.

8.3 The area of Green Belt south of the M4 in Slough was considered unsuitable for housing development because it contained the Jubilee river and the sewage works as well as having poor access and is mostly liable to flood.

8.4 A number of other pockets of Green Belt were also scoped out because they were not considered suitable for residential development for a variety of reasons such as their existing land use (eg education, cemetery, allotment, utility infrastructure, public open space); fundamental constraints such as flood risk or designated ecological value, or major utilities underground.

8.5 As a result, the ten possible sites identified in the Issues and Options consultation were:

- St Anthony's Field, Farnham Road;
- Wexham Park Hospital School of Nursing site, Wexham Street;
- Land to the rear of Opal Court Wexham Street;
- Land east of Wexham Park Hospital;
- North of Muddy Lane, Stoke Poges Lane;
- Land east of Rochfords Gardens;
- Bloom Park (part of), Middlegreen Road;
- Land East of Market Lane;
- Land south of Castleview Road (south of Bleheim Rd)
- Upton Court Farm; Upton Court Road

8.6 It should be noted that no detailed work was carried out about possible constraints to the development of the sites. The consultation document also recognised that they could be subject to policy constraints. These included Bloom Park being public open space, the Castleview site being part of an Historic Park and Garden, Market Lane being within the Colne Valley Park and Strategic Gap and St Anthony's Field having a role in the prevention of the coalescence of settlements.

8.7 The Spatial Strategy consultation document (2020) included the same ten sites as potential housing sites. It should be noted that the site south of Castleview Road was renamed as being south of Blenheim Road since this is a more accurate description of its location. No further assessments of these sites had been carried out at this stage and the document reiterated that consideration would have to be given to strategic policies and local designations.

8.8 No new possible "Omission" housing sites within Green Belt were identified through the Spatial Strategy consultation exercise apart from some in the Colnbrook and Poyle area. As a result these ten sites have been brought forward for

assessment as part of this consultation exercise.

8.9 One of the key elements of the proposed Spatial Strategy was “protecting the Strategic Gap between Slough and Greater London”. As a result the assumptions about not building any housing in the Colnbrook and Poyle area remained. This strategy would also effectively safeguard land from being developed which could be needed for the expansion of the airport in the future.

8.10 As a result no possible housing sites have been identified in the Colnbrook and Poyle area in this consultation document. Any comments upon this would be welcomed and any proposals that do come forward for the release of sites from the Green Belt will be considered against the criteria for site selection.

9 What criteria will be used for deciding which Green Belt sites could be released for housing?

9.1 There are a number of factors that have to be taken into account in deciding whether sites are suitable for housing or not. Some of these relate to Green Belt factors others do not as explained below.

Green Belt Considerations

9.2 All of the sites that have been identified as possible housing sites are in the Green Belt. Paragraph 137 of the National Planning Policy Framework (NPPF) states that the Government attaches great importance to Green Belts and that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. It is considered that all of the sites continue to have a Green Belt function and so have to be judged against Green Belt policy.

9.3 Paragraph 138 of the NPPF explains that the Green Belt serves five purposes:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

9.4 Not all of these are relevant to the sites in Slough but the need to check sprawl and prevent settlements from merging are two of the criteria that can be used for assessing the potential housing sites.

9.5 Paragraph 141 of the NPPF describes some of the beneficial uses of Green Belt land. This includes providing access and opportunities for outdoor sport and recreation as well as retaining landscapes, visual amenity and biodiversity. All of these factors can be included in the site selection process.

9.6 Paragraph 146 of the NPPF gives examples of how Green Belt land can be improved by looking for opportunities to provide access; provide opportunities for outdoor sport and recreation, to retain and enhance landscapes, visual amenity, biodiversity; or to improve damaged and derelict land. The potential impact upon any of these existing features can also be used as part of the site selection process.

9.7 Finally Paragraph 145 of the NPPF states that where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and/or is well served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt.

Other Site Selection Criteria set out in the National Planning Policy Framework

9.8 There are a number of other factors that have to be taken into account in order to ensure that any proposed development is sustainable. Paragraph 11 of the NPPF sets out the basic principle that:

“all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects”.

9.9 Paragraph 99 of the National Planning Policy Framework (NPPF) states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless they are surplus or being replaced with better provision.

9.10 Paragraph 110 of the NPPF states that in allocating sites for development in plans, it should be ensured that there are appropriate opportunities to promote sustainable transport modes and a safe and suitable access to the site can be achieved.

9.11 Paragraph 159 of the NPPF states that inappropriate development, such as housing, should be avoided in areas at risk of flooding.

9.12 Paragraph 175 of the NPPF states that plans should allocate sites with the least environmental or amenity value. This should be achieved by protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils and recognising the benefits of the best and most versatile agricultural land, and of trees and woodland(174).

9.13 Paragraph 189 of the NPPF explains that Heritage assets, including sites and buildings of local historic value, should be conserved in a manner appropriate to their

significance.

Paragraph 212 of the NPPF states that Local Planning Authorities should not permit other development proposals in Mineral Safeguarding Areas if it might constrain potential future use for mineral working .

Local Planning Policies

9.14 Existing and emerging local planning policies reflect those set out in the NPPF. There are, however, some additional strategic designations which need to be taken into account. The most important are the policies in the Core Strategy and emerging Spatial Strategy which seek to protect the “Strategic Gap” between Slough and Greater London and the Colne Valley Regional Park.

9.15 The site selection process also has to take account of one of the elements of the proposed Spatial Strategy which is to promote the cross border expansion of Slough to meet local housing needs. This will be informed by the Wider Area Growth Study which was originally jointly commissioned by Windsor & Maidenhead, South Bucks and Slough. Part 2 of this study, which is being carried out by Stantec, is due to be published in the coming months.

9.16 The Spatial Strategy also seeks to safeguard the proposed third runway at Heathrow which remains as Government policy as set out in the Airports National Policy Statement.

Conclusion

9.17 All the above criteria have been taken into account in coming to our initial conclusions about the suitability of sites for development for family housing. Full details of the site selection criteria and how they have been applied to individual sites are set out in Part 2 of the report.

9.18 One of the purposes of this consultation is to seek views as to whether the correct criteria has been used to assess the sites, and the weight given to them is appropriate and suitable (see question [insert ref. xx]).

10 Sustainability Appraisal

10.1 All elements of the Local Plan have to be informed throughout is preparation by a Sustainability Appraisal. This demonstrates how the plan has balanced the relevant economic social and environmental objectives and considered alternative options which could reduce significant adverse impacts upon these objectives.

10.2 An addendum to the Sustainability Appraisal of the Proposed Spatial Strategy has been produced which considers the proposed Release of Green Belt Sites for Family Housing. This does not assess individual sites at this stage but assesses the

extent to which the principle of developing greenfield sites to meet local housing needs meets the Sustainability Objectives. As a result this can be used to inform the decision making process.

10.3 The Sustainability Appraisal Report is available to view and comment upon and will be subject to public consultation for a six week period as part of the overall consultation exercise.

10.4 An Equalities Impact Assessment will also be available.

11 What are the initial conclusions?

11.1 All of the sites have been subject to a high level assessment against the criteria identified above. It should also be noted that further detailed technical assessments will be needed. One of the purposes of the consultation is to help gather evidence about what other constraints there may be to developing the sites.

11.2 All of the sites constitute an extension of the existing urban area, which are considered to be one of the most sustainable forms of development once all opportunities for the reuse of brownfield land have been used up..

11.3 None of the sites have any particular landscape value and there are not subject to any biodiversity or ecological designations. As a result there are no known fundamental constraints to development in these respects but they will have to be subject to detailed surveys

11.4 All of the sites contain potentially developable land that is not constrained by flood risk.

11.5 The key factors which distinguish the sites are the impact upon the wider Green Belt in terms of physical and visual sprawl, the impact upon the coalescence of settlements, the loss of public or private open space and the impact upon historical assets

11.6 In order to help inform the consultation, each site has been given a preliminary “traffic light” assessment to indicate whether they are considered “suitable”, “possible” or “unsuitable” for housing development. Maps of the sites are in the figure 1. The results of this are shown below:

“GREEN” Suitable

- Wexham Park Hospital School of Nursing site, Wexham Street;
- Land to the rear of Opal Court Wexham Street;
- Land east of Wexham Park Hospital;
- Land east of Rochfords Gardens;
- Upton Court Farm;

“AMBER” Possible

- Land East of Market Lane;
- Land south of Blenheim Road

“RED” Unsuitable

- St Anthony’s Field, Farnham Road;
- North of Muddy Lane, Stoke Poges Lane;
- Bloom Park (part of), Middlegreen Road;
- All other areas of Green Belt land

11.7 A detailed assessment of each site is set out in the proformas below but the main conclusions are as follows:

Red - Unsuitable sites

11.8 The development of **St Anthony’s Field** would have a significant visual impact upon the small gap between Slough and Farnham Royal resulting in the merging of the two settlements. It would also have an impact upon the adjoining Conservation Area. It is for these reasons that the site is considered to be “**unsuitable**” for housing development.

11.9 Building upon part of **Bloom Park** would result in the loss of public open space. This is considered to be sufficient reason to make this an “**unsuitable**” site for housing development.

11.10 The site **North of Muddy Lane** is part of the Singh Sabba sports centre playing field. The site consists of a strip of land along the Stoke Road frontage which is not delineated on the ground in any way. This, and the loss of private open space, is considered to make this an “**unsuitable**” site for housing development.

Amber – sites possibly suitable for family housing

11.11 The **land east of Market Lane** is part of the Colne Valley Park and forms part of the Strategic Gap between Slough and greater London. It is very visible with no clearly defined boundary. As a result any development could be described as “sprawl”.

11.12 The site was identified for possible housing development in the Slough Northern Extension study produced by Atkins in 2017. It also forms part of the area of search for major housing development in the Wider Area Growth Study which is being produced by Stantec. As a result it remains as a “**possible**” housing site but it is considered that it should only come forward as part of a wider comprehensive development where a full mitigation package can be provided. This will include the necessary infrastructure to make the development sustainable and include compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land.

11.13 The **land south of Blenheim Road** is adjacent to the recent Kings Reach housing development which was released from the Green Belt for housing development in the 2004 Local Plan for Slough. One of the reasons why the proposed site was not allocated for housing at that time was that it formed part of the designated Ditton Park Historic Park and Garden. Any harm or loss of a designated heritage asset such as a registered park and garden should require exceptional, clear and convincing justification.

11.14 The site is not in the same ownership as the rest of the park and has no discernible historic features. As a result it remains as a “**possible**” housing site provided heritage objections can be overcome with suitable mitigation.

Green – Sites suitable for family housing

11.15 There are no fundamental policy objections to the development of the cluster of sites around Wexham Park Hospital. Land to the south was released from the Green Belt in the 2004 Local Plan and the three proposed sites would result in the rounding off of development in the area.

11.16 As a result **Wexham Park Hospital School of Nursing site, Wexham Street; Land to the rear of Opal Court Wexham Street; and Land east of Wexham Park Hospital** are considered to be “**suitable**” for housing development.

11.17 **Land east of Rochfords Gardens** is a natural infilling site because it is surrounded by development on three sides. It is field with no intrinsic qualities. As a result it is considered to be a “**suitable**” site for housing development.

11.18 The **land at Upton Court Farm** is a partly underutilised site close to the centre of Slough. It has a number of buildings on the northern side fronting Upton Court Road and is well contained. As a result, on balance, this is considered to be a “**suitable**” site for residential development.

Additional general requirements

11.19 A full explanation as to why the sites may or may not be suitable for housing development is set out in the site assessments in part 2 of this document.

11.20 It should be noted that the sites have not been the subject of detailed site technical assessments at this stage. It is recognised that some of them may have access issues and parts of some of them are liable to flood.

11.21 It will also be necessary to show that development of the sites is viable and capable of delivering family and affordable housing in high quality developments.

11.22 All of these issues will have to be resolved before the sites can be considered for allocation for development in the Local Plan.

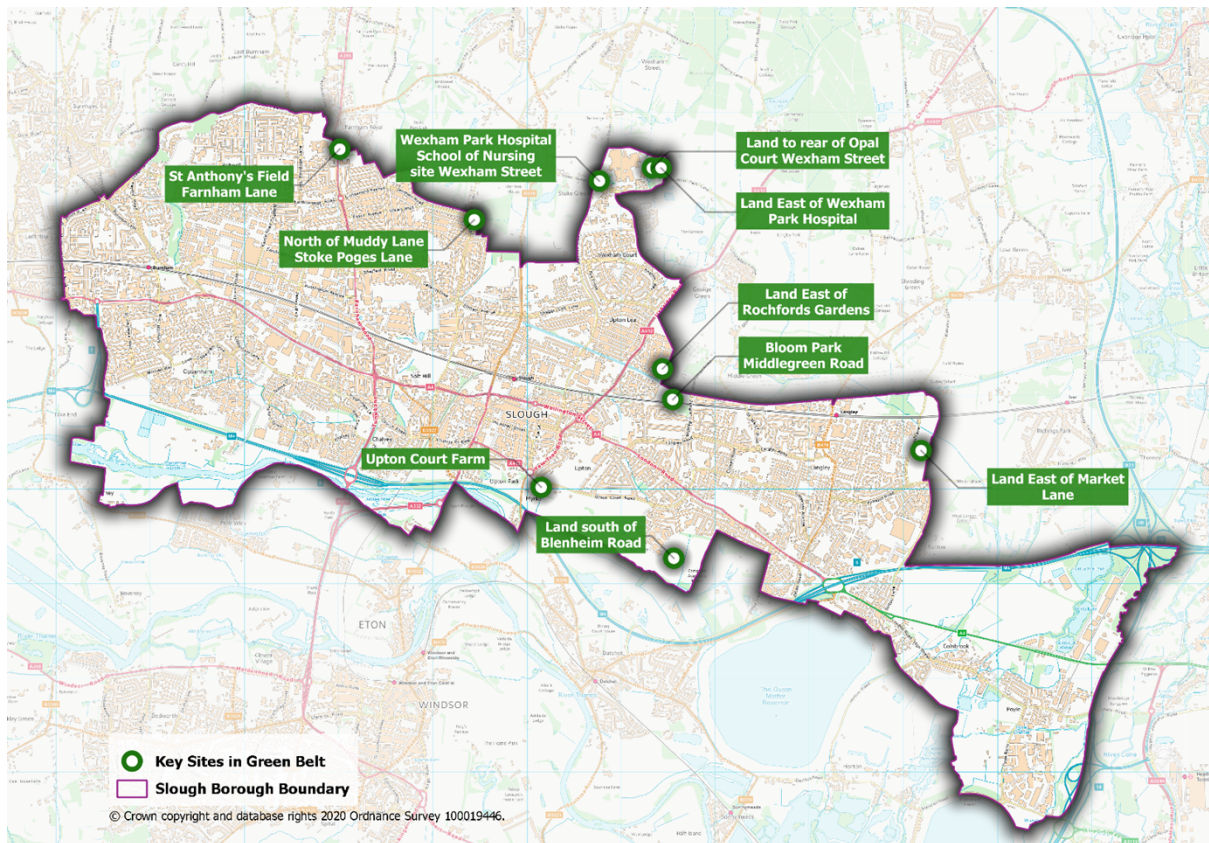


Fig. 1 Plan of proposed Sites to be released from the Green Belt for family housing ; see Part 2 for individual sites

12 What is the process for releasing Green Belt land?

12.1 Although the site assessments have taken account of some elements of Green Belt policy, they have not addressed the fundamental issue of the presumption against inappropriate development in the Green Belt. As a result they will have to be subject to a Green Belt Assessment. This will have to consider the impact upon the Green Belt in terms of the loss of openness and the impact upon the five purposes of having Green Belt which are:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land

12.2 The Government attaches great importance to Green Belts which are to be regarded as permanent. Paragraph 140 of the NPPF states that “Green Belts should only be altered where exceptional circumstances are fully evidenced and justified,

through the preparation or updating of plans”.

12.3 There is no definition as to what constitutes “exceptional Circumstances” but the Courts have found that “In principle, a shortage of housing land when compared to the needs of an area is capable of amounting to very special circumstances”.

12.4 The final decision as to whether it is justifiable to allocate Green Belt sites for housing in Slough will have to be made through the Local Plan process once we have taken into account a number of factors.

12.5 Firstly we will have to consider the response to the public consultation. Secondly we will have to carry out all of the necessary detailed technical work to ensure that the proposed housing can be delivered. Thirdly we will have to compile further evidence, including a detailed updated Housing Capacity Study, to confirm that we have left “no stone unturned” in our search for alternative ways of providing housing, including family housing.

12.6 It will also be necessary to identify ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land.

12.7 Finally we will have to decide whether the release of Green Belt land in Slough is the most sustainable form of development for the Local Plan to promote in order to meet the objective of meeting a range of housing needs.

13 Conclusion:

13.1 This consultation document identifies ten sites that have had a high level assessment to indicate if they are suitable to be released from the Green Belt to provide family housing. This forms part of the ongoing work for the Local Plan for Slough.

We have done an initial assessment of the suitability of the sites but would like your views on any aspect of this. We have set out a few questions on the topics below:

[Insert questions]

- Site selection methodology
- Individual sites
- Any other Green Belt sites
- Alternatives to Green Belt releases
- Whether there are “exceptional circumstances” to justify the loss of Green Belt

PART 2 INDIVIDUAL SITE ASSESSMENTS

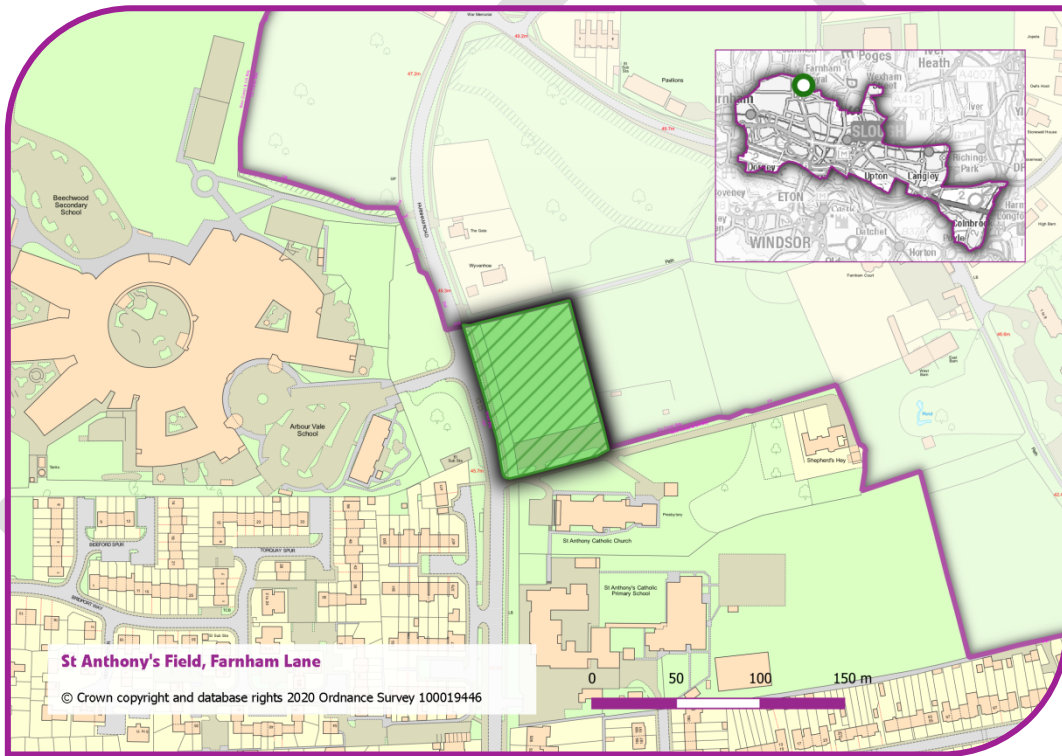
Site Name	Initial rating
1. Wexham Park Hospital School of Nursing, Wexham Street;	Green – Suitable
2. Land to the rear of Opal Court Wexham Street;	Green – Suitable

3. Land east of Wexham Park Hospital;	Green – Suitable
4. Land east of Rochfords Gardens;	Green – Suitable
5. Upton Court Farm;	Green – Suitable
6. Land East of Market Lane;	Amber – Possible
7. Land south of Blenheim Road	Amber – Possible
8. St Anthony's Field, Farnham Road;	Red – Unsuitable
9. North of Muddy Lane, Stoke Poges Lane;	Red – Unsuitable
10. Bloom Park (part of), Middlegreen Road;	Red – Unsuitable
11. All other areas of Green Belt land	Red – Unsuitable

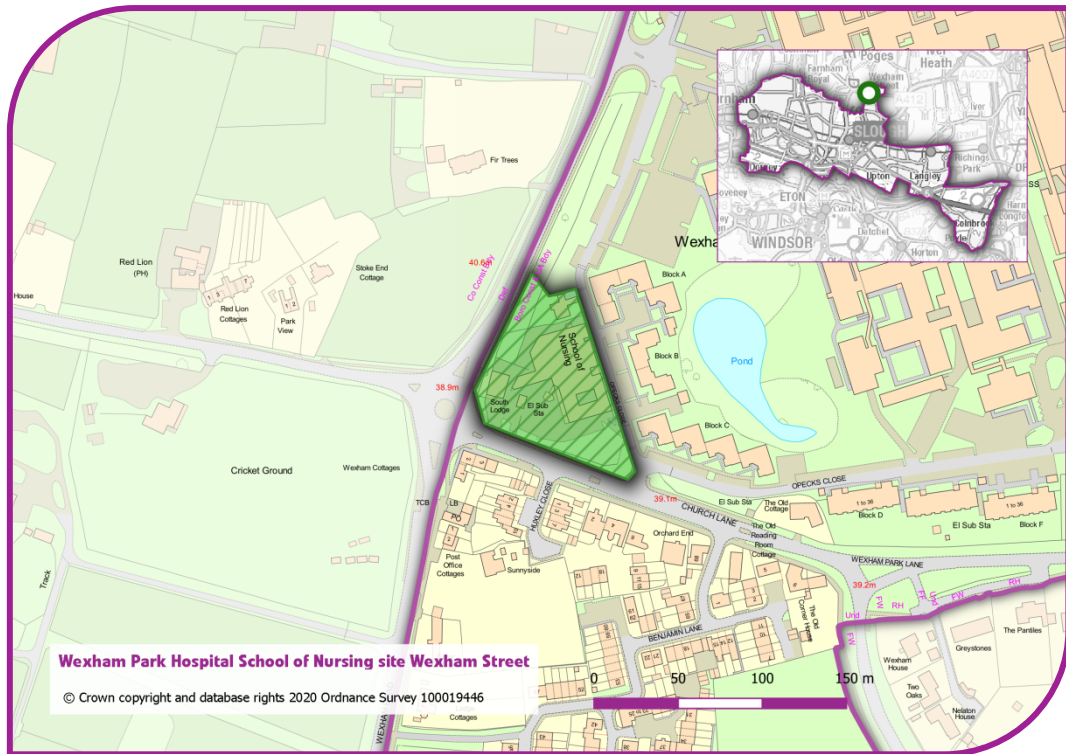
[insert site schedules]

Plans of Site locations and boundaries

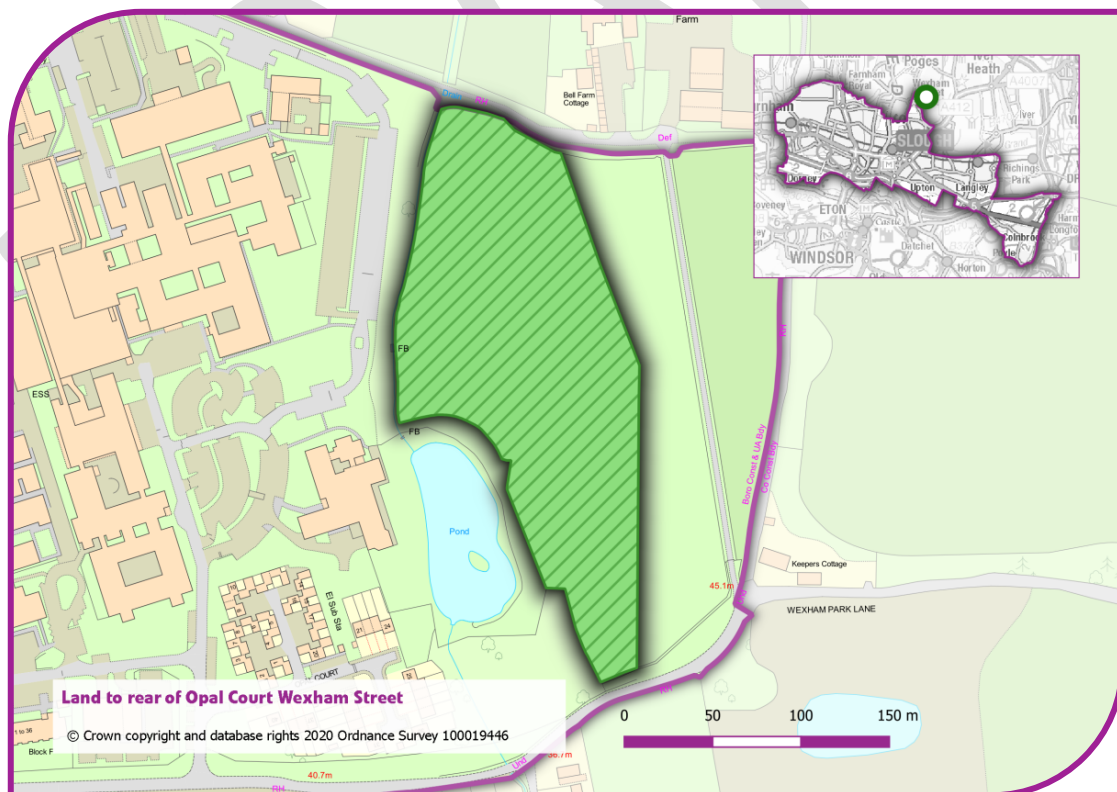
- Site 1 -St. Anthony's Field, Farnham Lane



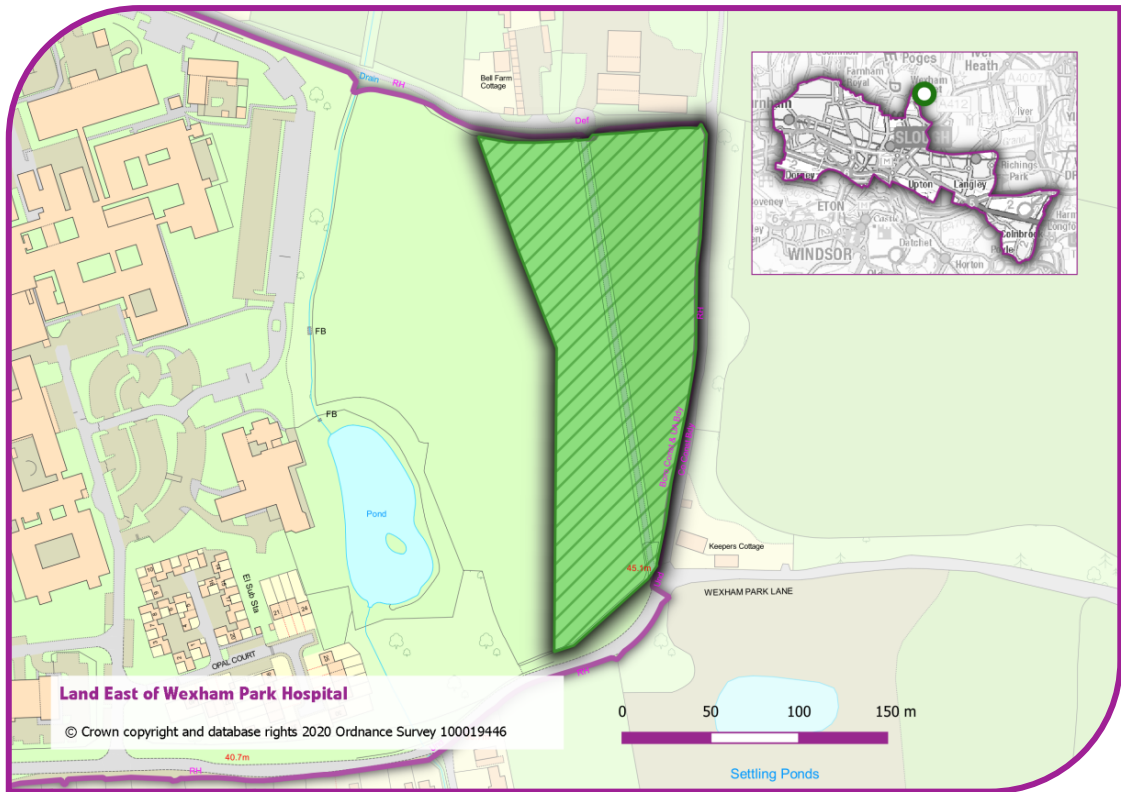
- Site 2 - Wexham Park Hospital School of Nursing site, Wexham Street



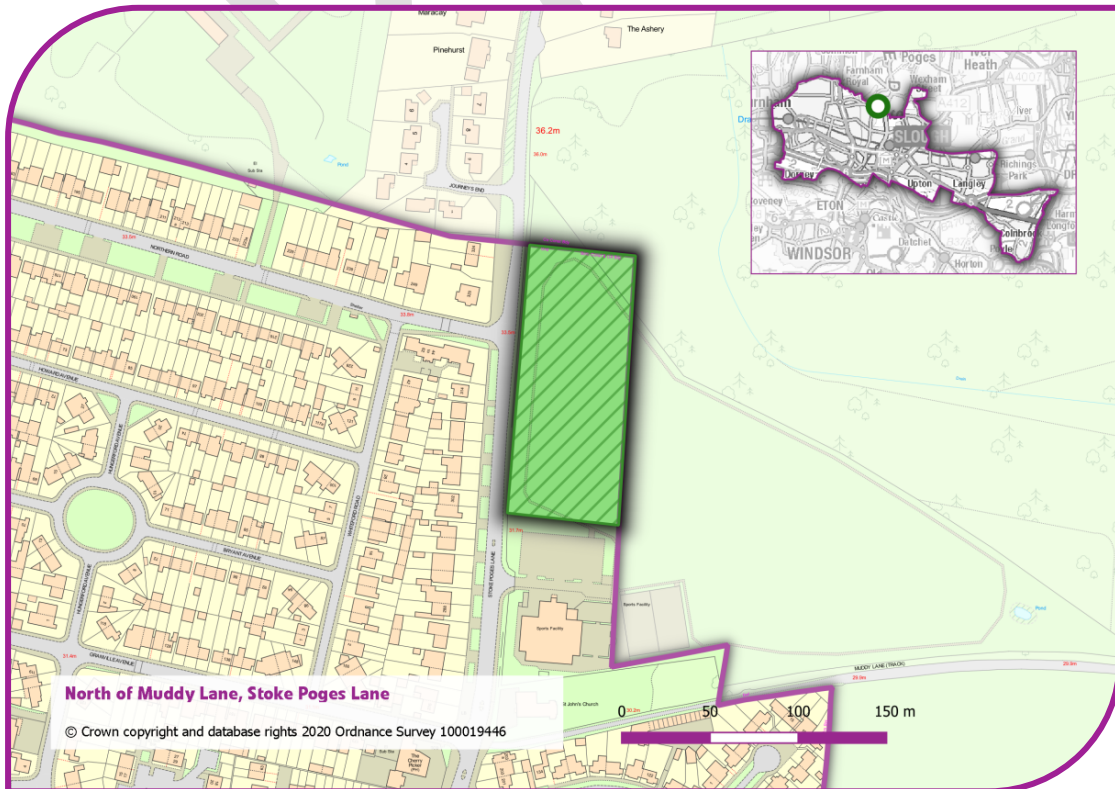
- Site 3 - Land to rear of Opal Court Wexham Street



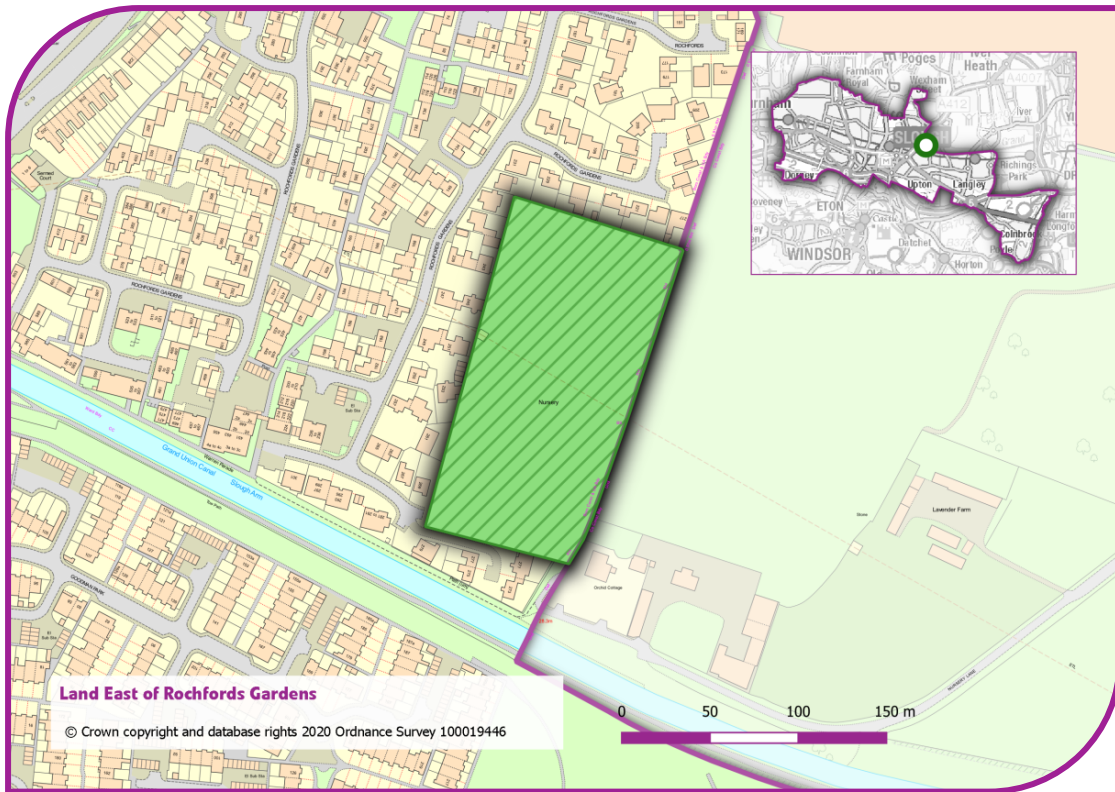
- Site 4 - Land east of Wexham Park Hospital



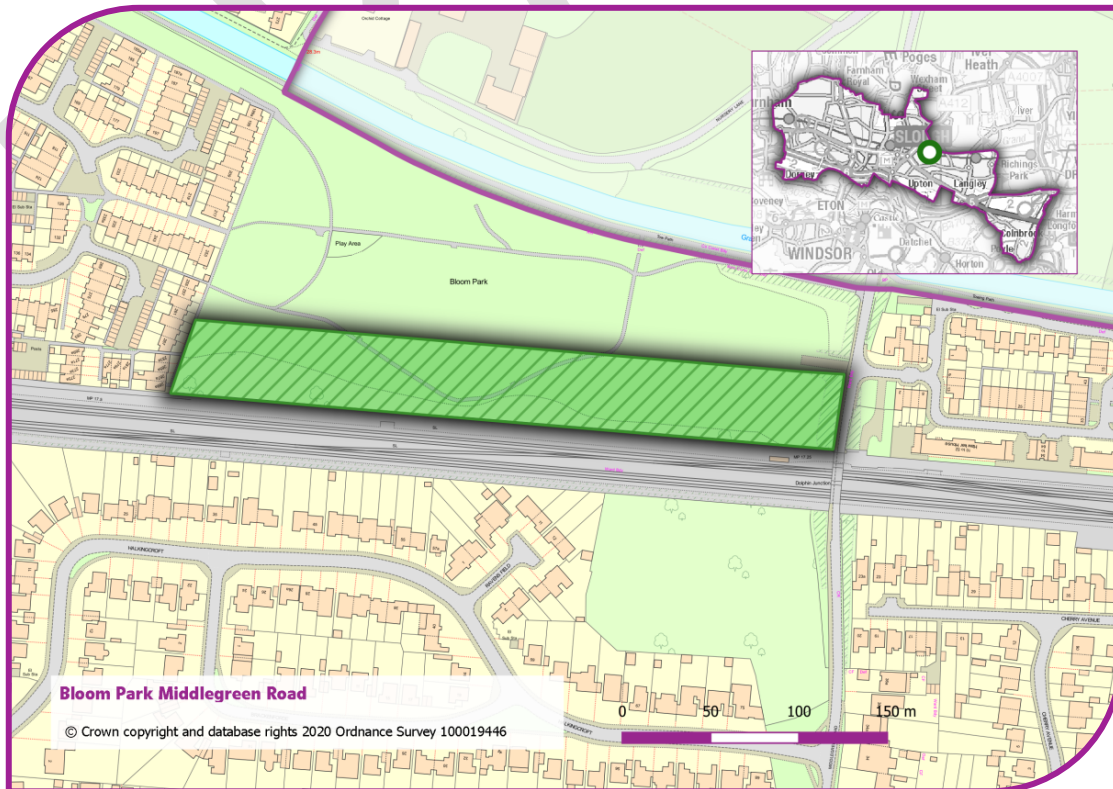
- Site 5 - North of Muddy Lane, Stoke Poges Lane



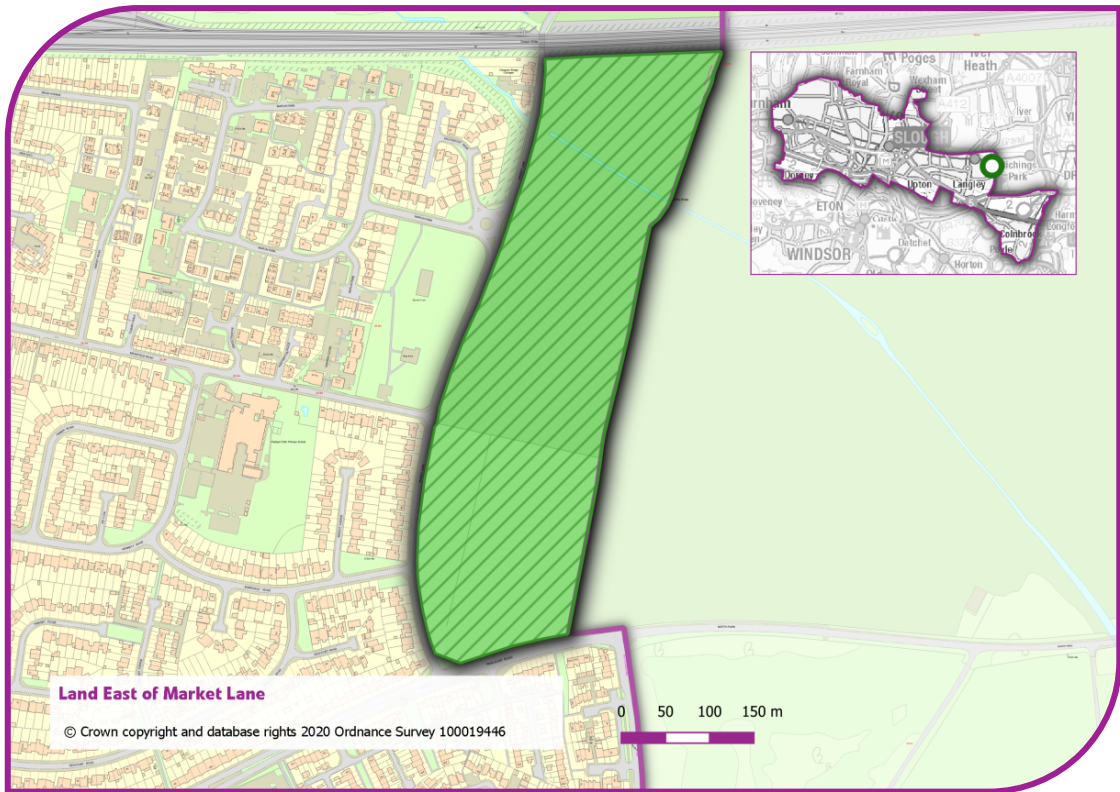
- Site 6 - Land east of Rochfords Gardens



- Site 7 – Part of Bloom Park, Middlegreen Road



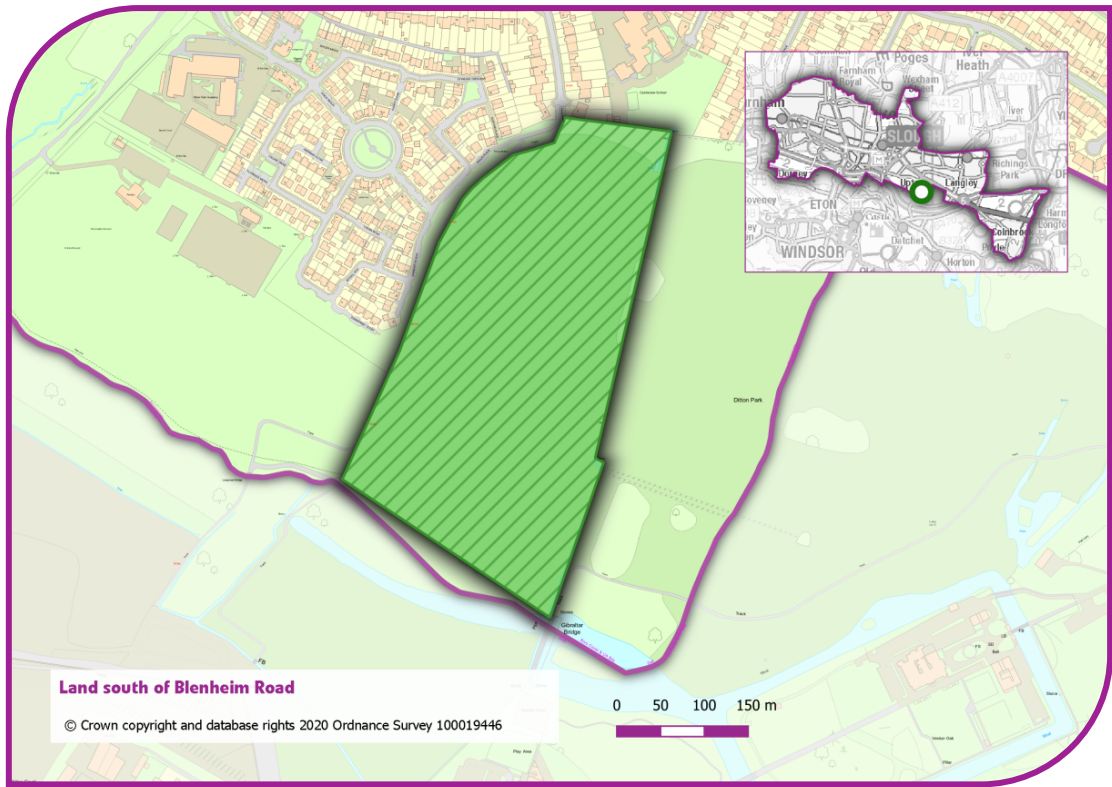
- Site 8 - Land east of Market Lane



- Site 9 - Upton Court Farm



- Site 10 - Land south of Blenheim Road



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