

**Review of the Slough's Local Development Plan against the 2023 NPPF
Tested at August 2024**

1. There are currently a number of plans which together form the adopted Local Development Plan for Slough. These are:
 - The Core Strategy (2008)
 - The Site Allocations (2010)
 - Proposals Map (2010)
 - The "saved" policies from the Local Plan for Slough (2004)
 - Replacement Minerals Plan for Berkshire (2001)
 - Waste Local Plan for Berkshire (1998)
2. The Core Strategy is the overarching strategic policy document in the Local Development Plan. It sets out the key issues to be addressed, and how this will be achieved through the spatial vision, strategic objectives, spatial strategy and supporting policies for addressing the social, economic and environmental issues for development across the Borough. It covers the period from April 2006 to March 2026.
3. The Site Allocations Development Plan Document supports the Core Strategy and identifies sites for the implementation of certain Core Strategy policies.
4. The "saved" policies of the 2004 Local Plan relate to a wide range of issues, including design, transport, housing, retail sites, building extensions, local nature conservation and green space.
5. The documents that make up Slough's Local Development Plan were all adopted prior to publication of the first National Planning Policy Framework (NPPF).
6. The NPPF was first published on 27 March 2012 and has subsequently been updated over the years with latest update on 19th December 2023¹.
7. Adopted plans will only be given weight according to their degree of consistency with the new Framework (NPPF paragraph 225).
8. In 2013, the Council assessed its plans against the NPPF in order to test the consistency of policies against the NPPF. The assessment was based on the PAS NPPF Checklist which focuses on the main areas where the NPPF has changed policy and identifies the key issues that have to be considered. It is available to view on the planning policy webpages².

¹ <https://www.gov.uk/government/publications/national-planning-policy-framework-2>

² [The local development plan for Slough – Slough Borough Council](#)

9. The Council considered that with one or two exceptions the policies in Slough's Plans performed well against the NPPF.
10. The Self Assessment highlighted that, because the Berkshire Minerals Plan is out of date, there is no current minerals allocation for Slough. This means that the plan does not fully comply with the requirements of the NPPF. This is not an issue in practice because the NPPF acknowledges that minerals can only be worked where they are found. Since virtually all potential minerals sites in Slough have already been dug apart from two remaining "Preferred Areas", these effectively constitute Slough's allocation. Policy 10 of the Minerals Plan sets out a presumption against minerals extraction outside of the Preferred Areas. This policy was based upon previous calculations that there was an adequate supply of minerals in Berkshire. Since it is not possible to assess whether this is still the case, it was considered not appropriate to continue to apply this policy. It was agreed that Policy 10 (Outside Preferred Areas) of the Replacement Minerals Plan for Berkshire would no longer be used for development control purposes in Slough. There is no conflict with any of the remaining "saved" Minerals policies and the NPPF.
11. Planning law requires that planning applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise. The policies in the NPPF are material considerations which should be taken into account in dealing with applications. The current Local Development Plan when taken as a whole, is not considered to be out of date with the NPPF because the policies are broadly consistent with the NPPF.
12. When decisions on planning applications are made compliance with both the Local Development Plan and the NPPF are key considerations. Decision Notices issued by Slough Borough Council, include reference to how the NPPF has been considered. They incorporate the following text: "It is the view of the Local Planning Authority that the proposed development does improve the economic, social and environmental conditions of the area for the reasons given in this notice and it is in accordance with the National Planning Policy Framework."
13. The table below sets out an index of Slough's adopted Local Development Plans with an explanation to show how each policy complies with the NPPF December 2023.

Index of Adopted Plans and policies	Compliance with NPPF (September 2023)
Slough Core Strategy	
Spatial Vision	The Core Strategy has a positive "Spatial Vision" and "Strategic Objectives" which are reflected in the spatial strategy.
	NPPF paragraph 7 states that the purpose of the planning system is to contribute to the achievement of sustainable development and has an economic, social and environmental role (NPPF paragraph 8).
	The planning system should be genuinely plan-led (NPPF paragraph 15). Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.
	The Core Strategy Spatial Vision includes a number of economic elements. These include encouraging, "...the comprehensive redevelopment of parts of the town centre so that it can fulfil its role as a regional hub and maintain its position as an important regional shopping, employment and transport hub."
	It also states that, "The existing business areas in Slough will have an important role in maintaining a thriving local economy and providing a range of jobs for an increasingly skilled workforce."

OSC8 (Green Spaces), OSC9 (Allotments) OSC17 (Loss of Community, Leisure or Religious Facilities) CG1 (Colne Valley Park), CG2 (Linear Park), CG4 (Slough Arm of the Grand Union Canal), CG9 (Strategic Gap) T7 (Rights of Way)	NPPF paragraph 142 states that the Government attaches great importance to Green Belts. It retains the presumption against inappropriate development unless there are very special circumstances. Core Policy 2 is compliant with the current NPPF. Core Policy 2 supports the following NPPF paragraphs (96, 97, 103 and 104) and its role that planning has in facilitating community cohesion and wellbeing.
Core Policy 2 CG9 Strategic Gap	The Strategic Gap part of Core Policy 2 is derived from the Spatial Strategy in Core Policy 1 and supported by Saved Policy CG9 Strategic Gap. As a result it is a place making policy which is needed to help implement the Spatial Strategy of "concentrating development". This policy permits development in the Strategic Gap between Slough and Greater London and the open areas of the Colne Valley Park if it is essential to be in that location. The Strategic Gap policy has been found by the Courts to be an additional layer of policy restraint over and above that of Green Belt and a very high bar to development. As a result the Green Belt policy set out in the NPPF is not applicable to the Strategic Gap and Colne Valley Park elements of Core Policy 2. A link to presentation on Strategic Gap can be found here: G:\A Local Plan Document Library\StrategicGap (copy in pacis-saturn drive)\Green Belt and Strategic Gap.pptx
Core Policy 3 Housing distribution	Core Policy 3 Housing Distribution directs development to the town centre or other appropriate urban areas. NPPF paragraph 61 states: To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area (see paragraph 67 below) The housing figures set out in Core Policy 3 are based upon the housing requirement set out in the South East Plan. The figure is expressed as a minimum. Slough's local housing need is now calculated using the standard method; it is currently 856 dwellings per year (May 2024) In the previous 'Consistency of the Slough Local Development Plan with the National Planning Policy Framework' (2013), Slough did have a good record of housing delivery and was able to demonstrate a five year supply of housing in Slough. However, the Council cannot demonstrate a five-year supply of deliverable housing sites. The Council can only demonstrate a 2.6-year supply. ³ The agreed existence of an undersupply triggers paragraph 11d) of the Framework. This means, according to the Framework, the policies are out of date. In these circumstances, paragraph 11 d) (ii) of the Framework states permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies of the Framework taken as a whole. Core Policy 3 is compliant with the current NPPF.

³ Slough Local Plan Annual Monitoring Report 2022/23