

## ROYAL BOROUGH OF WINDSOR AND MAIDENHEAD - BOROUGH LOCAL PLAN EXAMINATION

***Issue 2: Is the Plan's spatial strategy as expressed in Policy SP1 the most appropriate strategy when considered against other reasonable alternatives?***

*Q1 g. Are the housing numbers tested under Options 6 and 7, which include a lower and higher allowance for unmet needs in Slough, realistic? Did the Council consider the possibility of an option which would account for some of the unmet need of Slough below the 20,000-25,000 homes tested under Options 6 and 7 respectively? Why was Option 5, which would provide for 15,560 homes rejected?*

As we set out in our statement on Matter 2 we are concerned that the Council only tested a higher housing figure after the regulation 19 consultation. This indicates a failure to consider wider strategic alternatives when preparing the Local Plan. The Council has been solely focussed on meeting its own needs and not its ability to deliver more homes in order to address the unmet needs arising elsewhere in the HMA. This focus on meeting their own housing needs will have ultimately led to the preparation of a spatial strategy for achieving this principle aim. If co-operation had been more effective a higher housing requirement would have been considered that met some, but not all, of Slough's unmet needs with other neighbouring authorities also taking responsibility. These could then have been considered jointly, tested during the preparation of the plan and potentially enabled the development of a sustainable strategy to meeting the needs of the HMA. Whilst it may be possible to deliver the higher housing targets we would expect an SA to have included an option for the delivery of a smaller proportion of Slough's unmet housing needs.

However, our concerns regarding the alternative strategies that are considered in CD-005 are not solely in relation to the unmet needs within the HMA. As set out in our representation we considered it important that the Council provide a more significant uplift to the demographic starting point to take account of the market signals found in RBWM and the HMA. We suggested a 20% uplift was required for there to be a reasonable prospect of the Council improving affordability in the area. This would result in the delivery of 790 dwellings per annum with 15,800 homes being provided across the plan period. This level of delivery is not dissimilar to the Government expectations under the standard methodology which was tested in Option 5 of the SA addendum (CD-05).

The Government are clear that the amount of housing that would be required using the standard methodology is the level of housing delivery that is most likely to have an impact on affordability. This position was articulated in the 2017 Autumn Budget Statement during which the Chancellor announced the Government's target for house building across the country stating:

*“I’m clear that we need to get to 300,000 units a year if we are going to start to tackle the affordability problem, with the additions coming in areas of high demand.”*

In fact there is a risk that the Government’s standard methodology will not achieve this aim given that evidence submitted by the Treasury to the House of Lords Select Committee on Economic Affairs<sup>1</sup> suggested that to stabilise house price growth and prevent affordability from worsening would require between 250,000 and 300,000 new homes to be built each year. Given that the standard methodology would deliver 266,000 homes it is likely that the level of delivery achieved through the standard methodology will, at best, stabilise the current position rather than improve it.

We therefore disagree with the that Council’s assessment which concludes that the current housing requirement of 14,400 has the same significant positive impact as the other higher growth options when assessed against the criteria used for assessing the impact on housing which is to “*ensure that everyone has the opportunity to live in a decent and affordable home*”. In assessing both option 4 and 5 against this criteria we would suggest that option 4 is likely to have a positive effect but not the significant positive effect of option 5. Only a spatial strategy that achieved, as a minimum, the level of delivery set out by Government using the standard methodology could be considered to have the significant impact on the Council’s own criteria.

We would also disagree with the assessment in relation to climate change and bio-diversity. The Council consider that option 4, the level of development being proposed in the Local Plan, the impact to be neutral/ no effect but for option 5 it is considered that there is a likely adverse effect. To suggest that building 14,240 homes will have no effect on climate change but that an additional 1,320 homes is likely to have a negative impact is surprising given that the Council state in paragraph 3.4.4 of DC-05 that the general absence of data renders the assessment of this objective somewhat uncertain and unclear. There is no evidence to suggest that this level of additional development would have an identifiably worse effect than that proposed in the local plan.

Similarly with regard to bio-diversity it is surprising that the Council suggests that the Council’s current approach is likely to have discernibly less impact than option 5 given that the additionality of any impact on SPA and SAC have not been tested. The amount of additional land required will be minimal compared to the total area of undeveloped land in the Borough. The Council have stated that 83% of the Borough is Green Belt the vast majority of which is undeveloped. As the Borough covers 19,800 ha This amounts to around 16,435 ha. An additional 1,320 homes would require 39 ha of land at 30dph, which is 0.26% of the Borough’s land outside of the urban area. With regard to SPA and SAC CD-005 recognises in paragraph 3.4.9 that the in-combination effects of the proposed level of development in the local plan on a number of SACs and SPAs cannot be ruled however this assessment is based on the submitted Borough Local Plan and as such the additional impact of the options do not seem to have been tested on these latest option nor the impact of proposed mitigation to offset any negative impacts. The likely

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<sup>1</sup> <https://publications.parliament.uk/pa/ld201617/ldselect/ldeconaf/20/20.pdf>

impact of Option 4 and Option 5 are likely to be broadly similar, when mitigation is taken into account, with regard to bio-diversity and this should have been recognised.

We would suggest that the effects of housing options 4 and 5 are likely to be similar with regard to their environmental impacts but that the higher housing target of option 5 would have a more positive social impact. In particular the impact on housing affordability, a key element of the social branch of sustainable development, is likely to be more significant. In addition we consider that the negative effects identified in the SA in relation to option 5, and its subsets, could be mitigated to ensure that the local plan provided a better balance between addressing significant issue of housing needs and affordability whilst minimising the negative environmental effects. We would therefore disagree with the Council's final assessment that option 4 is the best performing option. Given the similarity of the potential impacts Option 5 could be considered to be the more sustainable on the basis of its more significant effect with regard to meeting housing needs and improving affordability.

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