

Housing and Economic Land Availability Assessment (HELAA) Methodology

Draft for Consultation

Monday 8 June 2026 to Monday 29 June 2026 (11:59pm)

Local Plan for Slough Borough Council

Housing and Economic Land Availability Assessment Methodology

Local Plan Consultation

Monday 8 June 2026 to Monday 29 June 2026 (11:59pm)

Planning Policy
Slough Borough Council
Observatory House
25 Windsor Road
Slough
SL1 2EL

General enquiries: planningpolicy@slough.gov.uk

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Equal opportunities

If you need any assistance to participate please contact the Planning Policy Team using the methods above before the consultation end date, or call 01753 477341.

About this Consultation

The Council welcomes representations on the draft HELAA Methodology, including the approach to identifying and assessing sites, including the key assumptions and thresholds applied.

The consultation is open from **Monday 8 June 2026 and closes on Monday 29 June 2026 (11:59pm)**. If you are unable to meet this deadline, please notify us by then, as submissions received after the close will not formally be considered.

The Council will consider valid representations in finalising the methodology, including making refinements where appropriate to ensure alignment with national policy and guidance.

Comments are invited on the proposed methodology only; the identification, assessment and conclusions relating to specific sites will be subject to a separate consultation.

How to Submit Representations

Representations can be made using the following methods:

Online: Via the Council’s consultation portal:

<https://slough.citizenspace.com/planning-policy/draft-helaa-methodology>



Download the questionnaire and return to us:

By email:

planningpolicy@slough.gov.uk

Please include “HELAA Methodology Consultation” in the subject line

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By post:

Planning Policy Team
Slough Borough Council
Observatory House
25 Windsor Road
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What to Include in Your Response

The consultation invites comments to improve or fact-check the proposed methodology, to ensure transparency in the approach prior to its application.

To ensure your representation is valid please include your name, address and contact details. For us to consider specific comments please:

- Include the section reference or paragraph number it relates to.
- Provide an explanation with supporting evidence or justification where appropriate.
- Include whether you support, object to, or wish to suggest modifications to the proposed approach.

The Council particularly welcomes views on the following key matters, which involve locally specific assumptions and the application of professional judgement in the Slough context:

- the proposed site size thresholds for inclusion in the HELAA
- the proposed density assumptions applied when estimating site capacity
- whether the consultation process demonstrates effective cross-boundary cooperation, and engagement on strategic matters
- the proposed 30 dwellings per annum windfall allowance, the assumptions underpinning its calculation, and whether the resulting estimate is appropriate and robust

Status of this document

This consultation document currently has no formal planning status or weight in decision-making. The final version will be a material consideration for its intended purpose and will be used unless and until superseded by Government policy or guidance.

This consultation document has been prepared having regard to national Planning Practice Guidance (PPG) relating to Housing and Economic Land Availability Assessments (HELAA).

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The Council is now preparing its Local Plan under the Government's 2026 Local Plan Regulations . This methodology has been reviewed to ensure it remains aligned, where appropriate, with emerging national guidance on site identification and assessment.

The consultation will enable the outputs to form part of the Local Plan evidence base, alongside other technical reports that inform the development strategy.

Maintaining effective co-operation

The NPPF requires local planning work collaboratively with other authorities to demonstrate that effective co-operation on strategic matters of cross-boundary importance has been undertaken to ensure a consistent and robust approach. This consultation is carried out in this capacity.

Next steps

All valid representations will be considered, and the methodology finalised taking account of the consultation, alongside national policy and guidance.

A summary of the main issues raised and changes may be published alongside the finalised methodology.

Opportunities to comment on the findings of the HELAA, including the identification and assessment of sites, will be provided at a later stage alongside the publication of the outputs and through the Local Plan process.

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1. Introduction

- 1.1 This document sets out Slough Borough Council's (SBC) Housing and Economic Land Availability Assessment (HELAA) methodology. It has been prepared having regard to national policy and Planning Practice Guidance (PPG) and Local Plan Regulations (2026) and draft guidance, and will support early scoping work for the emerging Local Plan.
- 1.2 The HELAA is needed to inform an early assessment of the borough's development potential for housing and employment from identified land supply, as Slough is working with Buckinghamshire on cross boundary housing supply for the emerging plans, ahead of agreement on the geographies for Spatial Development Strategies.
- 1.3 The findings of the assessment, including site-specific conclusions and capacity estimates, will be published separately in the HELAA Report. The assessment will establish an understanding of land availability, constraints and development potential across the borough, to provide a comprehensive and robust understanding of land availability in meeting Slough's needs, demonstrating that all reasonable opportunities for development have been identified and considered.
- 1.4 The HELAA Report will form an early iteration of the Local Plan evidence base and support compliance with the tests of soundness by demonstrating that the Plan is based on a robust and transparent assessment of land availability. Consultation has been carried out to demonstrate that the Council has continued to collaborate across its boundaries, including on unmet development needs from neighbouring areas.
- 1.5 Where sufficient capacity cannot be identified within Slough, the HELAA will provide evidence to inform ongoing engagement with neighbouring authorities, including through Statements of Common Ground and wider strategic cooperation, to address any unmet need.

2. Why the Assessment is Required

- 2.1 The need for the assessment arises from the NPPF, which requires LPAs to prepare an assessment of land availability to support plan-making. The NPPF (paragraph 72) states:

"Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

- a) *specific, deliverable sites for five years following the intended date of adoption; and*

b) specific, developable sites or broad locations for growth, for the subsequent years 6–10 and, where possible, for years 11–15 of the remaining plan period."

2.2 This national policy requirement underpins the approach set out in this methodology, including the identification and assessment of sites and the estimation of deliverable and developable land supply. Emerging Government guidance on plan-making (including the draft 'Create Update Local Plan' guidance) will be taken into account in preparing Slough's Local plan.

2.3 The HELAA methodology does not allocate land for development but informs the staged approach to site identification, assessment and review as set out in later sections of this document.

2.4 Through this assessment, the HELAA Report aims to:

- Identify sites and broad locations with potential for housing and economic development across Slough.
- Assess the development potential of sites and their suitability, availability and achievability.
- Provide a transparent and evidence-based assessment of deliverable and developable land supply, including an indicative trajectory.
- Support the preparation of the Local Plan through the identification land supply and by informing infrastructure planning.
- Demonstrate effective joint working with neighbouring authorities across the Housing Market Area (HMA) and Functional Economic Market Area (FEMA) and provide evidence to support ongoing cross-boundary engagement, including discussions on addressing any unmet housing or economic development needs that cannot be met within Slough.
- Reflect changes to plan-making and site assessment processes as national policy and guidance evolves.

3. Planning Practice Guidance on HELAA Methodology

3.1 The Government's PPG (paragraph: 001 Reference ID: 3-001-20190722) provides further detail on the approach to preparing HELAAs. It advises that an assessment should:

- Identify sites and broad locations with potential for development
- Assess the development potential of these sites and locations; and

- Assess their suitability for development and the likelihood of development coming forward, including consideration of availability and achievability.
- 3.2 These core principles underpin the methodology set out in this document and inform the approach to site identification, assessment and review, in line with national policy and guidance.

4. Local Plan Legislation and Policy Context

- 4.1 The assessment of sites will be undertaken in accordance with relevant legislation, national policy and planning practice guidance, ensuring a comprehensive and proportionate approach aligned with national policy, guidance and best practice.
- 4.2 The methodology has had regard to the PPG (published in November 2025). Other key documents include:

Adopted national policy and legislation

- Planning and Compulsory Purchase Act 2004 (as amended)
- Levelling Up and Regeneration Act 2023
- Planning and Infrastructure Act 2025
- Town and Country Planning (Local Planning) (England) Regulations 2026 (March 2026)
- National Planning Policy Framework (NPPF) (December 2024)
- Planning Practice Guidance (PPG): Housing and Economic Land Availability Assessment (originally published in 2014, updated most recently in November 2025)
- Housing Supply and Delivery Guidance (2019)
- Brownfield Land Registers (July 2017)
- Town and Country Planning Act 1990 (as amended)
- Self-Build and Custom Housebuilding Act 2015

Emerging policy and guidance

- Draft National Planning Policy Framework (December 2025)
- ‘Create Update Local Plans’ guidance (MHCLG, December 2025), which introduces templates and procedures to support emerging plan-making reforms, including a proposed 30-month plan-making system.

5. Uses included in the methodology

5.1 The methodology assesses land for two main types of development:

- Housing, including:
 - Standard homes (Planning Use Class C3)
 - Residential institutions such as care homes (Planning Use Class C2)
 - Specialist housing (e.g. supported living for older people, people with disabilities or other care-related housing); and
 - Gypsy, Traveller and Travelling Showpeople accommodation.
- Economic development, including:
 - Commercial, business and service uses (Planning Use Class E)
 - Community facilities (Planning Use Class F2); and
 - Certain sui generis uses such as hotels, leisure facilities, pubs, hot food takeaways and storage and distribution uses.

5.2 When assessing a site, these represent the potential development uses that may be considered. The appropriateness of each use and the density applied will depend on the site's characteristics, its context, local policy, national guidance and past delivery trends in comparable locations.

5.3 Not all uses will be appropriate on every site and the HELAA Report does not predetermine the preferred use of any site.

6. Geographical Area of the Assessment

6.1 The assessment applies to the whole plan-making area, which comprises the SBC administrative boundary.

6.2 SBC is a unitary authority located in Berkshire, within the Thames Valley sub-region and adjacent to Greater London. The borough covers a compact urban area with a mix of residential, commercial and industrial land uses (with their supporting social, transport and utility infrastructure), which is well connected by the Great Western Main Line, Elizabeth Line, M4 corridor and M25 (and is close to Heathrow Airport). Slough shares strong housing and economic linkages with neighbouring authorities including the Royal Borough of Windsor and Maidenhead, Buckinghamshire and Bracknell Forest. Slough also has functional connections to Reading and the London Borough of Hillingdon, including strong commuting flows, transport links and shared housing and economic relationships, as illustrated in Figure 1.

- 6.3 The apparent suitability of a site's qualities such as capacity, suitability, availability and achievability does not itself determine the distribution of development across administrative boundaries; this will be addressed through the Local Plan process and ongoing cross-boundary engagement, and in due course through Spatial Development Strategies.

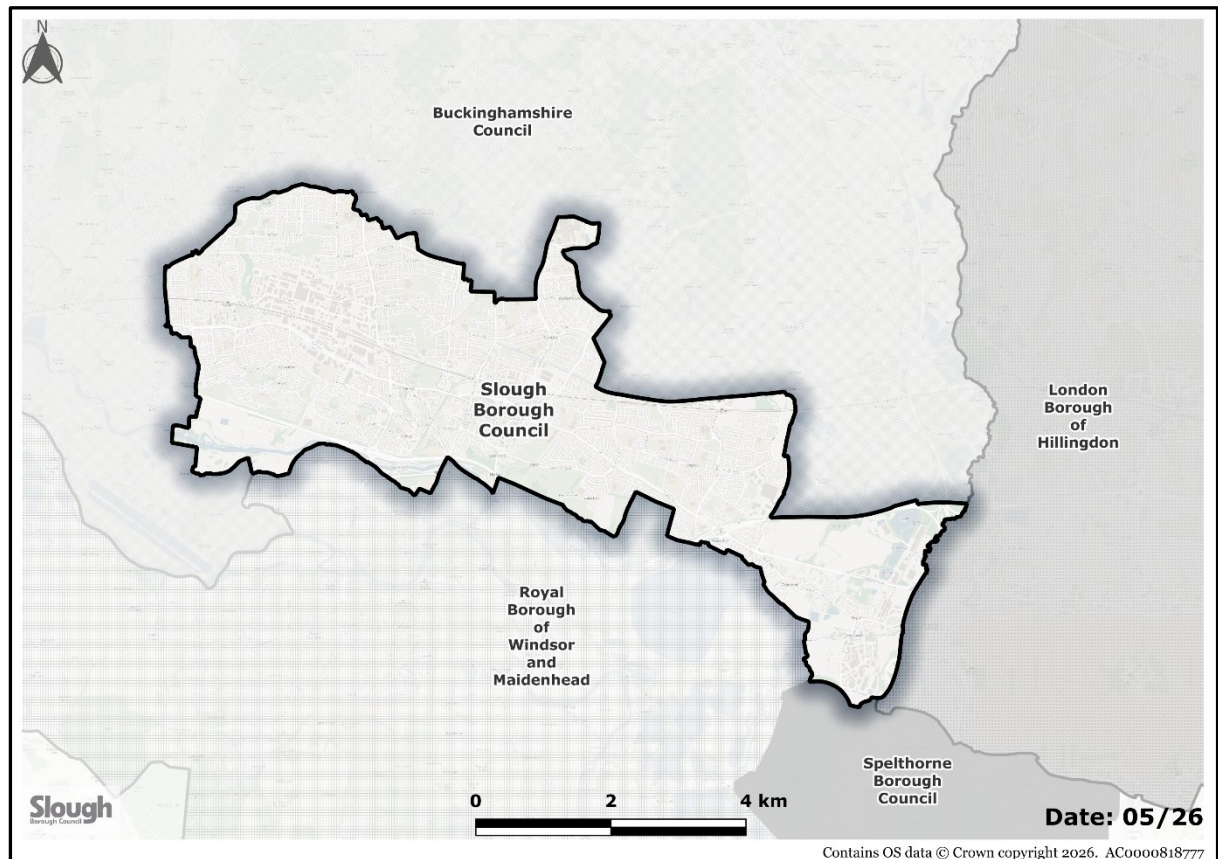


Figure 1: Map of the area covered by the HELAA, showing the SBC administrative boundary and adjoining local planning authorities.

7. Strategic/Cross-Boundary Context

- 7.1 The HELAA methodology has regard to cross-boundary relationships within the relevant Housing Market Area (HMA) and Functional Economic Market Area (FEMA), recognising the importance of working collaboratively with adjoining authorities to ensure a consistent and robust approach.
- 7.2 The Council will continue to engage with strategic authorities to ensure that the assessment and categorisation of land available to meet development needs provides a robust, consistent and transparent evidence base to inform Local Plan preparation.

- 7.3 Slough's housing and economic land needs are influenced by both the London housing market and the Thames Valley sub-region. Previous joint evidence work, including the Berkshire and South Bucks Strategic Housing Market Assessment (SHMA) (2016), and the Wider Area Growth Study identified an Eastern Berkshire and South Bucks HMA. This broadly comprised Slough Borough Council, the Royal Borough of Windsor and Maidenhead, the former South Bucks District (now part of Buckinghamshire Council), and Bracknell Forest Council. These relationships remain relevant in understanding functional housing market dynamics.
- 7.4 In addition to housing market relationships, Slough forms part of a wider Functional Economic Market Area (FEMA), reflecting its role within the Thames Valley and West London economies, including strong commuting patterns, strategic transport connections and economic linkages with neighbouring authorities, including Buckinghamshire, and the London Borough of Hillingdon. The NPPF expects housing and other needs to be undertaken and reviewed in collaboration with other LPAs within the relevant HMA and FEMA. For Slough, this collaboration will include ongoing engagement with adjoining authorities to share evidence, align key assumptions where appropriate (such as density and deliverability benchmarks), and ensure that the assessment provides a consistent and robust evidence base.
- 7.5 Where relevant, the assessment of development potential will inform Statements of Common Ground on housing and economic development issues that extend beyond administrative boundaries. The HELAA itself does not allocate land, determine redistribution of development, or resolve matters of unmet need; these issues will be addressed through the Local Plan process and ongoing strategic engagement.
- 7.6 This approach ensures that the assessment provides a consistent and transparent evidence base to support effective plan-making both within Slough and across relevant sub-regional geographies, and signposts early in the process how this evidence will inform subsequent stages of plan-making.

8. Methodology

- 8.1 The methodology facilitates a systematic assessment of potential housing and employment sites, evaluating their suitability, availability and achievability in a consistent, transparent and evidence-based manner.

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- 8.2 PPG (paragraph: 005 Reference ID: 3-005-20190722) sets out a sequential process for the HELAA, illustrated in Figure 2 below. This forms the basis of this iteration of the site assessment.
- 8.3 The five stages are listed below. The body of the report explains how national guidance has been applied in Slough:
1. Assessment area and site size
 2. Assessment of sites and broad locations
 3. Windfall assessment
 4. Assessment review
 5. Final evidence base
- 8.4 The methodology has been adapted to reflect Slough's constrained urban context and development characteristics. This high-level framework ensures site assessments are consistent, transparent and aligned with national guidance in the draft 'CULP' guidance on identifying sites.

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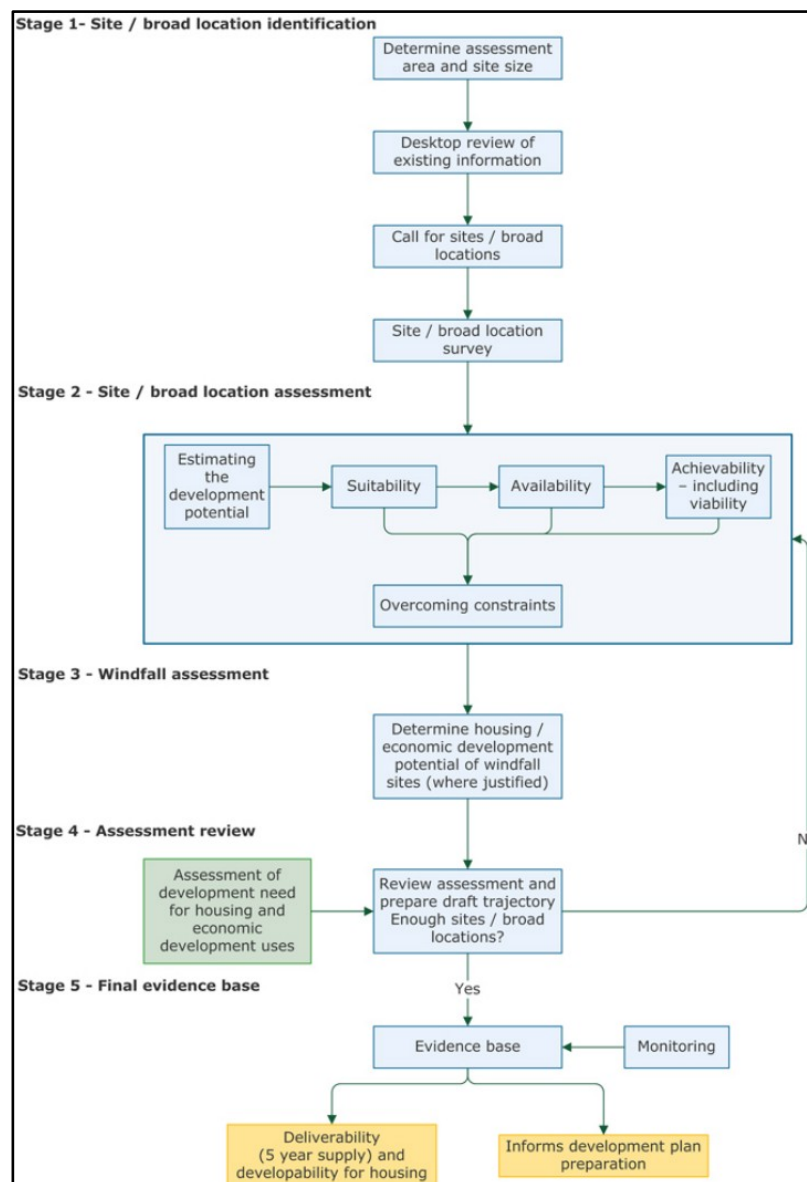


Figure 2: HELAA methodology flowchart (source: PPG, November 2025)

9. Stage 1: Assessment area and site size

- 9.1 The HELAA applies to the administrative area of Slough Borough Council and is informed by the Council’s monitoring activity. Specific thresholds have been applied to different site categories (see Table 1).
- 9.2 Professional judgement is used at this stage to estimate site capacity, taking account of factors such as surrounding building heights, known or obvious development constraints, site context, local character and any obvious physical constraints that would clearly limit development potential (e.g. the presence of major utilities that cannot reasonably be diverted). At this stage, constraints are identified at a high level to inform site capacity and whether a

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site is capable of accommodating development, but they are not assessed in detail; this is undertaken as part of the Stage 2 suitability assessment. This initial consideration is proportionate and does not constitute a detailed assessment of site suitability, which is undertaken at Stage 2.

- 9.3 This approach provides a practical balance because setting the threshold too low would introduce an excessive number of very small sites, while setting it too high could exclude a significant share of the borough's housing supply.
- 9.4 To ensure completeness, sites with planning permission are included even if they fall below five dwellings, as these form part of the committed supply. This aligns with the NPPF requirement to make the most efficient use of land in sustainable locations.

Thresholds by site location

- 9.5 Table 1 sets out the minimum site areas and thresholds for site inclusion by category.

Category	Threshold
General Sites	≥ 5 dwellings
Town Centre Sites	≥ 0.05 ha (smaller sites may be included if high-density development is achievable).
Employment Land	≥ 0.25 ha or 500 square metres floorspace

General Housing Sites (outside the town centre)

Sites capable of delivering five or more dwellings are included in the HELAA. This threshold ensures the process focuses on sites with meaningful development potential while avoiding an excessive number of very small sites and recognising opportunities for higher-density schemes in accessible locations. Sites with planning permission below this threshold are still included as part of the committed supply for completeness. (*In line with the PPG)

Town Centre Sites

In town centre locations, sites of 0.05 hectares (ha) or larger are generally considered suitable for assessment, reflecting their potential for higher-density development. This reflects examples of high-density schemes (up to 200 dwellings per hectare (dph)) while meeting acceptable living standards. Smaller sites may also be included where there is a reasonable prospect of delivering five or more dwellings in line with policy and good practice, taking account of site-specific constraints.

Employment Land

For employment sites, minimum size thresholds ensure the assessment focuses on land with meaningful development potential. Sites should generally be at least 0.25 hectares in size and capable of accommodating 500 square metres or more of floorspace. This threshold is considered appropriate for Slough and reflects national guidance.

- 9.6 Sites that fall below the minimum thresholds are not normally taken forward for detailed assessment through the HELAA, unless they have planning permission or there is a reasonable prospect of achieving development above the relevant threshold. Smaller sites may instead contribute to the Council's assessment of committed supply or windfall delivery, as appropriate.
- 9.7 These thresholds are applied at Stage 1 of the HELAA to support a proportionate and transparent site identification process. They do not determine the suitability of sites for development, which is assessed in detail at Stage 2, and professional judgement will continue to be applied to account for site-specific circumstances.

Desktop review of existing information

- 9.8 The PPG requires the assessment to identify a comprehensive range of sites and avoid being overly constrained by existing policy, ensuring previous restrictions are properly tested. In line with this guidance, the process proactively identifies potential sites and broad locations rather than relying solely on those already known. Sites with constraints are included for completeness, with those constraints clearly documented to maintain transparency.
- 9.9 The PPG (paragraph: 011, Reference ID: 3-011-20190722) advises plan makers to consider a wide range of site types and data sources when

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preparing a HELAA. It also provides examples of potential sites and suggested sources for desktop review.

9.10 The sources used in the desktop review are summarised in Table 2 below. Table 2 builds on this guidance by adapting the PPG framework and adding SBC-specific enhancements, such as brownfield registers, monitoring data and local intelligence. These additions ensure the review is comprehensive, tailored to Slough's context, and support the validation of housing and employment trajectories, helping to maintain consistency with the five-year land supply assumptions.

Type of Site	Potential Data Source (PPG suggestions)	Data Source for SBC HELAA
Existing housing and economic development allocations and site development briefs not yet with planning permission	<ul style="list-style-type: none"> • Local and neighbourhood plans • Planning application records • Development Briefs 	<ul style="list-style-type: none"> • Adopted Development Plan Documents: <ul style="list-style-type: none"> ○ Core Strategy ○ Site Allocations ○ Local Plan Saved Policies ○ Saved minerals safeguarding areas in the adopted Minerals and Waste Local Plan ○ Proposals Map • Planning application records
Planning permissions for housing and economic development that are unimplemented or under construction	<ul style="list-style-type: none"> • Planning application records • Development starts and completions records 	<ul style="list-style-type: none"> • Planning application records • Development starts and completions records • Building control data
Planning applications that have been refused or withdrawn	<ul style="list-style-type: none"> • Planning application records 	<ul style="list-style-type: none"> • Planning application records • Appeal decision records
Land in the local authority's ownership	<ul style="list-style-type: none"> • Local authority records 	<ul style="list-style-type: none"> • SBC Property Team records

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Type of Site	Potential Data Source (PPG suggestions)	Data Source for SBC HELAA
		<ul style="list-style-type: none"> • Asset Disposals Strategy
Surplus and likely to become surplus public sector land	<ul style="list-style-type: none"> • National register of public sector land • Engagement with strategic plans of other public sector bodies such as county councils, central government, National Health Service, police, fire services, utilities services, statutory undertakers 	<ul style="list-style-type: none"> • One Public Estate programme • Direct engagement with NHS, police, fire service, utilities, statutory undertakers and rail infrastructure providers
Sites with permission in principle, and identified brownfield land	<ul style="list-style-type: none"> • Brownfield Land Register (parts 1 and 2) • National Land Use Database • Valuation Office database • Active engagement with sector 	<ul style="list-style-type: none"> • SBC Brownfield Land Register • Planning application records • Local intelligence
Vacant and derelict land and buildings (including empty homes, redundant and disused buildings, potential permitted development (PD) changes e.g. offices to residential)	<ul style="list-style-type: none"> • Local authority empty property register • English Housing Survey • National Land Use Database • Commercial property databases (e.g. estate agents and property agents) • Valuation Office database • Active engagement with sector • Brownfield land registers 	<ul style="list-style-type: none"> • Valuation Office database • Planning application records • Local intelligence • Review of existing significant office buildings. Brownfield Land Registers

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Type of Site	Potential Data Source (PPG suggestions)	Data Source for SBC HELAA
Additional opportunities for unestablished uses (e.g. making productive use of under-utilised facilities such as garage blocks)	<ul style="list-style-type: none"> • Ordnance Survey maps • Aerial photography • Planning applications • Site surveys 	<ul style="list-style-type: none"> • Discussions with SBC Property and Housing teams • Ordnance Survey maps • Aerial photography (e.g. Ordnance Survey) will be used on a proportionate basis to identify potential development opportunities. This does not represent a comprehensive or exhaustive review of all land parcels, particularly very small sites, but provides a broad and practical evidence base in line with national guidance. • Planning applications
Business requirements and aspirations	<ul style="list-style-type: none"> • Enquiries received by LPA • Active engagement with sector 	<ul style="list-style-type: none"> • Call for Sites submissions • Discussion with the Economic Development Team • Local business forums • Simplified Planning Zone and engagement with landowner regarding development proposals • Engagement with NHS estate strategies and emerging planned development

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Type of Site	Potential Data Source (PPG suggestions)	Data Source for SBC HELAA
		<p>proposals within the borough.</p> <ul style="list-style-type: none"> • Heathrow Airport expansion proposals and associated Development Consent Order documentation (including pre-application materials) – used as contextual evidence on strategic infrastructure constraints, safeguarding and future impacts, not as a source of housing or employment land supply. • Pre-application discussions with developers and landowners that have not progressed to formal planning applications.
Sites in rural locations	<ul style="list-style-type: none"> • Local and neighbourhood plans • Planning applications • Ordnance Survey maps • Aerial photography • Site surveys 	<p>These site types are not applicable to Slough, with the exception of large-scale redevelopment and redesign of existing residential or economic areas and potential urban extensions.</p>
Large scale redevelopment and redesign of existing residential or economic areas		
Sites in adjoining villages and rural exceptions sites		
Potential urban extensions and new free-standing settlement		

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Type of Site	Potential Data Source (PPG suggestions)	Data Source for SBC HELAA
		regeneration frameworks and cross-boundary evidence, such as the Wider Area Growth Study) <ul style="list-style-type: none"> • Local intelligence

Table 1: Site Types and Data Sources (informed by PPG recommendations and local enhancements).

9.11 The desktop review is used to identify a comprehensive range of potential sites and to record known constraints for transparency. The presence of constraints at this stage does not preclude sites from further consideration. Detailed assessment of suitability, availability and achievability is undertaken at Stage 2 of the HELAA.

Call for sites

9.12 The PPG expects a Call for Sites at Stage 1 of the HELAA process to ensure the identification of as many potential development opportunities as possible. Identification of sites through the Call for Sites does not determine whether a site is suitable for development, which is assessed in detail at Stage 2 of the HELAA.

9.13 SBC has undertaken three formal Call for Sites exercises:

- **April – May 2025:** The most recent Call for Sites focused on major landowners, agents, and individuals who had previously expressed interest through planning policy consultations, ensuring transparency and compliance with Reg 18 of the Legacy Planning system.
- **November – December 2021:** The Council ran a dedicated consultation on potential Green Belt sites for family housing, with details published on its website. This provided stakeholders an opportunity to comment on their suitability.
- **January – February 2016:** The Council launched its first Call for Sites, inviting suggestions for land or property in Slough that could be redeveloped or reused. This was followed by a formal consultation to gather feedback on the submissions and ensure transparency and early engagement.

- 9.14 Respondents were asked to provide consistent information on key aspects, including site size, current use and proposed scale of development, to ensure submissions were comparable. Sites from earlier Calls for Sites are retained in the Council's database for completeness, but their availability is reviewed each time the HELAA is updated. For each update, the starting dataset comprises sites from the last published version, with sites where availability cannot be confirmed removed. New submissions received outside the formal Call for Sites period may not be included in the next HELAA publication and may instead be assessed as part of a subsequent update.
- **June 2025 – onwards:** To maximise opportunities for site identification, the Council will continue to accept site submissions during evidence gathering for the new Local Plan. Where appropriate, targeted Calls for Sites may also be undertaken at specific stages of plan preparation to ensure the HELAA remains comprehensive and consistent with national guidance.

Site/broad location survey

- 9.15 Sites identified through the above processes will be collated and mapped to remove duplicates. Each site will then undergo an initial desktop review to determine whether it proceeds to Stage 2 for detailed assessment.
- 9.16 At this stage, sites are reviewed at a high level to confirm whether they fall within the scope of the HELAA and have a reasonable potential to accommodate development, taking account of known constraints.
- 9.17 Stage 1 will produce the following outputs, which will be summarised in a corresponding table in the HELAA:
- a) Sites outside the scope of the HELAA (Table 2A)
 - b) Sites with planning permission (Table 2B)
 - c) Sites discounted at Stage 1 as unsuitable or unavailable (Table 2C)
 - d) Sites taken forward to Stage 2

Sites outside the scope of the HELAA

- 9.18 Table 2A summarises the exclusion criteria applied at Stage 1 of the HELAA. This approach ensures the process is proportionate and prioritises sites with realistic development potential, consistent with the PPG.
- 9.19 The thresholds applied are consistent with Stage 1 (Assessment Areas and Site Size) and Table 1. Generally, sites below five dwellings or less than 0.25 ha for employment are excluded, except where smaller town centre sites can deliver high-density development. This approach ensures that very small

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sites, which would not materially contribute to identified housing or employment needs, are excluded from detailed assessment.

9.20 In addition, sites which are completed, duplicates, or otherwise outside the scope of the HELAA are removed to ensure a clear and auditable site register.

Category	Reason	How it will be identified
Sites with a capacity of fewer than 5 dwellings (except where smaller town centre sites meet high-density criteria, as set out in Stage 1: Assessment Area and Site Size).	Threshold for HELAA eligibility not reached in accordance with the PPG. Given Slough's highly urban character and density variations, professional judgment is applied where capacity is unclear. Sites below this threshold will normally form part of the windfall allowance, except where smaller town centre sites are suitable for high-density development.	Information provided by developers or landowners through Call for Sites submissions and planning records, supplemented by professional judgment where capacity details are unclear or unrealistic.
Sites with an area of less than 0.25ha or capacity for less than 500sqm of floorspace for economic development.	Threshold for HELAA eligibility not reached in accordance with the PPG.	Developer and landowner submissions, supported by planning application data and professional judgment to estimate realistic employment floorspace where plot size or ratios are not provided.
Sites with fully implemented planning permission and completed development are excluded from the HELAA, including sites previously assessed in earlier	Completed sites are outside the scope of the HELAA as they no longer contribute to future supply.	Completions data verified against planning records and where necessary, confirmed through site visits to ensure development status.

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Category	Reason	How it will be identified
land availability reports.		
Large or extensive sites that require subdivision into smaller parcels to reflect multiple ownerships or to enable realistic and accurate assessment.	Subdivision is required to reflect multiple ownerships, distinct development parcels, or to enable realistic and accurate assessment. Where sites overlap or are contained within a larger promoted site, they may be merged into a single site record to ensure a single, comprehensive and auditable assessment.	Mapping data and developer/landowner information reviewed to identify overlapping or contained sites, ensuring accurate subdivision and cross-referencing in the HELAA database
Sites with no realistic potential for redevelopment or intensification	Fully developed sites with no scope for redevelopment or change of use.	Planning records reviewed to confirm development status, supplemented by site visits and aerial photography where necessary to verify that no scope for redevelopment or change of use exists.

Table 2A: Criteria for Sites Outside the Scope of the HELAA

Sites with planning permission

9.21 Whilst the HELAA records sites with planning permission, these do not require detailed assessment as they have already been publicly assessed and found to be suitable, available, achievable, and where relevant, deliverable for the specified uses and yields. However, the following exceptions apply:

- Outline planning permissions for major development, which require further evidence to confirm deliverability in accordance with the PPG, will be assessed in detail at Stage 2.
- Sites where permission covers only part of a HELAA site; in such cases, the entire site will be assessed at Stage 2, with the permission noted in the planning history section of the proforma.
- Sites with pending applications at the end of the most recent monitoring year will be assessed in detail at Stage 2.

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9.22 For clarity, sites may still be subject to updated evidence or changing circumstances, and where necessary, professional judgement will be applied to confirm whether existing permissions remain deliverable.

9.23 Table 2B sets out the criteria for sites with planning permission or allocations.

Category	Reason	How it will be identified
Sites with existing planning permission (excluding outline planning permissions for major development)	These sites are generally considered suitable, available and achievable, and therefore do not require detailed assessment at Stage 1.	Planning permission records and monitoring data reviewed to confirm status and delivery timescales.
Outline planning permissions for major development (including permission in principle)	Further evidence is required to confirm deliverability in accordance with the PPG; these sites will therefore be assessed in detail at Stage 2.	Planning permission records checked and additional evidence gathered during Stage 2 assessment.
Sites with planning permission covering only part of a HELAA site	Permission covers only part of a HELAA site; the full site will be assessed at Stage 2 to ensure consistency.	Planning history and GIS mapping reviewed to confirm extent of permission and site boundaries.
Sites with planning applications pending determination	Applications not determined at the end of the monitoring year require assessment to confirm suitability, availability and deliverability.	Planning application records monitored and flagged for Stage 2 assessment.
Allocated sites within the adopted Local Plan	Sites will be reviewed to ensure consistency with current evidence, policy requirements and delivery assumptions.	Local Plan allocations reviewed against the latest available evidence and monitoring data.

Table 2B: Criteria for Sites with Planning Permission or Allocated Sites

Sites discounted at Stage 1 due to fundamental constraints

9.24 The constraints listed in Table 2C are considered fundamental constraints ('showstoppers') that significantly affect a site's suitability and/or availability

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for development. In line with the PPG and SBC's Local Plan evidence requirements, and having regard to national policy and the need to provide a proportionate assessment, sites affected by these constraints are generally not considered capable of being delivered or developed within the plan period, taking account of the scale of constraint and the limited potential for mitigation. As such, they are excluded at Stage 1 and will not proceed to detailed assessment at Stage 2.

Category	Reason	How it will be identified
Flood Zone 3b (Functional Floodplain)	Sites wholly within Flood Zone 3b are excluded because these areas function as flood storage and are safeguarded under national policy (NPPF paragraphs 159-161). Development in these zones is considered inappropriate unless exceptional circumstances apply. Mitigation measures are not considered at Stage 1 because the Sequential Test and Exception Test would normally rule out development.	Confirmed using Environment Agency Flood Zone mapping and Slough Borough Council Strategic Flood Risk Assessment. Cross-reference with GIS layers to ensure accuracy.
Green Belt*	Development inappropriate unless plan-level changes or very special circumstances apply. For HELAA Stage 1, exclude sites wholly within Green Belt to reflect NPPF protection (Chapter 13).	Verified against adopted Local Plan policies and SBC GIS layers.
Airport Safeguarding Zones (Heathrow)	Development may be constrained depending on the nature of the proposal and safeguarding requirements. Where constraints are identified as prohibitive and cannot reasonably be mitigated, sites are discounted at Stage 1.	Where necessary, advice will be sought from Heathrow or air traffic specialists. Public Safety Zone policies at runway ends will also be reviewed to ensure compliance.
Potential Heathrow Expansion	Development may be restricted or subject to uncertainty due to proposed airport expansion and	Sites will be reviewed against Civil Aviation Authority safeguarding

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Category	Reason	How it will be identified
Safeguarding Area	associated safeguarding requirements. These areas are not currently implemented but may affect deliverability during the plan period.	maps, Heathrow Airport Limited Development Consent Order documentation, and SBC GIS layers to confirm whether they fall within potential expansion zones. Where applicable, monitoring updates will be incorporated as soon as available.
Minerals Safeguarding Areas	Development may be constrained by minerals safeguarding policies; where this results in a conflict that cannot be addressed, sites are discounted.	Berkshire Joint Minerals Local Plan Proposals Maps and Adopted Minerals and Waste Local Plan
Heritage Assets (Listed Buildings, Conservation Areas Historic Park and Gardens)	Development may not be appropriate where it would result in unacceptable harm to designated heritage assets and their significance. Sites are assessed to determine whether impacts could be mitigated; where this is not possible, sites are discounted.	Historic England datasets; SBC GIS
Ancient Woodland	Ancient woodland is protected under NPPF paragraph 180(c) as irreplaceable habitat. Development would result in unacceptable harm.	Identified using Natural England's Ancient Woodland Inventory and verified via SBC GIS layers.
Suitable Alternative Natural Greenspace (SANG)	SANG sites are safeguarded for biodiversity mitigation and cannot be developed without undermining SPA mitigation strategies.	Confirmed using Local Plan evidence base, mitigation strategies, and SBC GIS layers.
Local Nature Reserves and designated Local Wildlife Sites	Development may harm designated wildlife or heritage features, as these areas are managed for nature conservation.	Identified using SBC's conservation GIS layers and the Council's LNR register (e.g., Cocksherd Wood, Haymill Valley, Herschel Park).

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Category	Reason	How it will be identified
Severe Contaminated Land	Sites where contamination is known to be severe and remediation is unlikely to be feasible within the plan period are excluded.	Environmental Health records; SBC land contamination register
Sites confirmed as unavailable	Landowner/developer confirms site will not come forward within plan period.	Evidenced through correspondence and Call for Sites database.
Sites confirmed as not achievable	Severe viability issues prevent development within plan period.	Viability assessments; SBC monitoring data
Major hazard zones (Health and Safety Executive (HSE inner zones)	Development restricted due to health and safety regulations.	Major hazard consultation zones will be identified using up-to-date HSE datasets. Where hazards have been removed or operations have ceased and zones amended or revoked, these constraints will no longer apply.

Table 2C: Criteria for Sites Discounted at Stage 1 due to Fundamental Constraints

Additional Notes:

Certain nationally recognised constraints (e.g. Thames Basin Heaths SPA buffer, Ramsar sites and other European designations) are not present within Slough and are therefore not included in Table 2C. However, potential impacts on nearby designated sites, such as Burnham Beeches SAC, will be considered as part of the Stage 2 suitability assessment where relevant.

Registered parks and gardens are present within Slough and are considered as part of the Stage 2 suitability assessment, including their setting and significance, where relevant.

*Sites are not discounted solely on the basis of Green Belt designation. Where sites are wholly or partly within the Green Belt, they are identified and recorded for completeness and assessed as part of the HELAA process, including consideration of their development potential, suitability, availability and achievability, without prejudice to Green Belt policy. However, such sites are not considered suitable for development at this stage unless exceptional circumstances are demonstrated through the Local Plan process, including through any future review of Green Belt boundaries where justified.

10. Stage 2: Assessment of sites and broad locations

Estimating the development potential of sites (site capacity)

10.1 To assess the potential capacity of housing sites within Slough, a number of assumptions need to be made. SBC recognises the borough's highly constrained urban geography, limited land supply and strong development pressures. To make the most efficient use of land, the Council seeks to optimise densities where appropriate, particularly in accessible locations such as town centres and areas well served by public transport.

Housing Sites

10.2 Within this context, individual sites will have specific opportunities and constraints that influence their potential capacity. Professional judgement is applied to determine site capacity, based on site-specific factors, including but not limited to:

- **Surrounding setting, building heights, density and character** (including the historic environment and conservation areas).
- **Likely dwelling types to be accommodated** (e.g., flats, townhouses or mixed typologies).
- **Site accessibility and connectivity**, including proximity to public transport and services, which may influence parking provision and overall site capacity.
- **Policy context and design considerations**, such as Green Belt boundaries, airport safeguarding zones, and local design standards.
- **Physical constraints**, including irregular site shape, topography, major utilities present and potential contamination. Major utilities may, in some cases, represent an absolute constraint where diversion is not feasible, but more commonly may reduce the developable area or capacity of a site.

10.3 At this stage, capacity will be estimated using professional judgement on a proportionate basis, recognising that capacity estimates will be refined as further evidence becomes available through the assessment process.

10.4 These assumptions will be tested against viability benchmarks, infrastructure dependencies and phasing considerations to ensure that capacity estimates are realistic and deliverable within the plan period.

10.5 Capacity estimates will also reflect locally derived density assumptions based on site typology and location (e.g. town centre, suburban or mixed-use regeneration areas), informed by historic delivery trends and Local Plan

policy. Where appropriate, smaller sites in town centre locations may be included even if below the usual threshold, provided they can achieve high-density development in line with policy and good practice. Assumptions will reflect both adopted and emerging Local Plan policies, including housing mix requirements, and will be aligned with neighbouring authorities where possible to maintain consistency across the HMA.

- 10.6 These assumptions ensure that capacity estimates are realistic, reflect Slough's urban character and comply with national policy requirements for making the most efficient use of land, as set out in the NPPF and PPG.
- 10.7 These assumptions will be applied through the HELAA process, with final capacity estimates reported in the HELAA findings. Further detail on density assumptions, viability considerations and phasing is provided in later sections of this document.

Employment sites

- 10.8 The capacity of potential employment sites varies significantly depending on the type of employment use proposed, as different uses have distinct layout patterns and floorspace requirements. To assess the potential capacity of employment sites within Slough, the HELAA applies a consistent set of assumptions that reflect the borough's economic role, land constraints and market dynamics. Employment land assessments focus on sites capable of accommodating 500 sq. m or more of floorspace or measuring 0.25 hectares or larger, in line with the PPG. Professional judgement is applied to estimate capacity, taking account of:
- Current and proposed employment uses (e.g., offices, industrial, warehousing, mixed-use schemes).
 - Site accessibility and connectivity, including proximity to strategic transport corridors such as the M4 and Heathrow Airport.
 - Policy context and designations, including Green Belt, Airport Safeguarding Zones and local employment protection policies.
 - Physical constraints, such as site shape, topography, contamination and utilities availability.
 - Market signals and viability considerations, including demand for specific employment typologies and potential for mixed-use redevelopment.

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- 10.9 At this stage, professional judgement is applied on a proportionate basis, recognising that capacity estimates may be refined as further evidence becomes available through the assessment process.
- 10.10 Capacity assumptions will be informed by locally derived plot ratios and employment density benchmarks, which will be tested against viability, infrastructure requirements and market conditions to ensure deliverability within the plan period. Where appropriate, sites may be considered for intensification or redevelopment to optimise land use, particularly in accessible locations or regeneration areas. Assumptions will align with adopted and emerging Local Plan policies and, where possible, maintain consistency with neighbouring authorities across the FEMA.
- 10.11 These principles ensure employment land capacity estimates are realistic, support economic growth objectives and comply with national policy requirements for making the most efficient use of land, as set out in the NPPF and PPG.

Assessing suitability, availability and achievability

- 10.12 The assessment is undertaken on a proportionate basis, reflecting site-specific circumstances and the scale of development proposed.
- 10.13 Any sites that have not been considered by SBC before are subject to a detailed assessment to establish whether they are suitable, available and achievable for development, in accordance with the NPPF and the PPG. This includes desk-based analysis and site visits to confirm site area, current land use, surrounding character and any environmental constraints.
- 10.14 Sites already assessed in previous versions of the HELAA are re-examined to identify any changes in circumstances. Suggested criteria for assessing suitability, availability and achievability are set out in the following sections.
- 10.15 The identification of a potential constraint does not automatically result in a site being discounted. Sites are only excluded at this stage if constraints are unlikely to be overcome within the plan period. This assessment informs whether sites are classified as deliverable, developable or not currently developable, ensuring a transparent and evidence-based approach.

Assessing Site Suitability

- 10.16 The PPG (paragraph: 018 Reference ID: 3-018-20190722) states that: *‘a site or broad location can be considered suitable if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated. [...] Plan-makers need to*

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assess the suitability of identified sites or broad locations for different forms of development where appropriate, taking into account the range of needs for housing, economic and other uses.'

- 10.17 In assessing the suitability of sites for residential development, the PPG recommends including as wide a range of sites as possible. Within Slough, there is a strong presumption that housing and economic development is required to meet identified growth needs. However, the borough's highly constrained urban geography means that a balance must be struck between competing priorities, such as:
- Protecting ecologically sensitive areas and designated heritage assets.
 - Safeguarding key employment sites that are critical to Slough's economic role.
 - Maintaining Green Belt land in accordance with national policy.
 - Addressing airport safeguarding zones and potential Heathrow expansion areas.
 - Delivering high-density, sustainable housing in accessible locations such as town centres and transport corridors.
- 10.18 These considerations do not represent absolute constraints on development in all cases. Rather, they form part of a balanced assessment of suitability, taking account of the nature and extent of any constraints and the potential for mitigation. For example, the Council acknowledges national guidance on reviewing the long-term protection of employment land where justified by evidence. Similarly, Green Belt boundaries and airport safeguarding zones, including potential Heathrow expansion areas, are considered in line with national policy but do not automatically preclude assessment for completeness.
- 10.19 Where constraints are identified, an assessment is made as to whether they can be reasonably mitigated or managed within the plan period, having regard to site-specific circumstances and the scale and type of development proposed. In all cases, site-specific factors are assessed using the criteria set out in Table 3A, ensuring a transparent and proportionate approach.

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Site Suitability – Considerations at Stage 2	
Consideration	Questions to Ask
Biodiversity	<p>Is there a reasonable likelihood that protected species could be present?</p> <p>Could development have a potential impact on habitats or species of principal importance?</p>
	<p>Is it likely that Biodiversity Net Gain could be accommodated on site?</p> <p>Is there scope to adequately mitigate any potential impacts on protected areas, species or habitats? This will include consideration of the potential impact of new housing on Special Protection Areas and the consideration of opportunities to mitigate potential impacts (e.g. through provision of Suitable Alternative Natural Green Space (SANG)).</p>
Local Green Space	Is the site designated as Local Green Space?
Public Open Space	<p>Is the site designated as protected public open space?</p> <p>Would development result in unacceptable loss of open space, or could impacts be mitigated or reprovided in accordance with policy?</p>
Green Belt	<p>Is the site wholly or partly within the Green Belt?</p> <p>Could development be justified under NPPF exceptional circumstances?</p>
Burnham Beeches Special Area of Conservation (SAC) Buffer Zone	<p>Could development affect water flows linked to Burnham Beeches?</p> <p>Could development increase visitor numbers and put pressure on Burnham Beeches?</p>
Neighbouring Land Uses	<p>Are there nearby uses that could affect the site or be affected by development?</p> <p>Could development cause unacceptable impacts on adjacent uses?</p> <p>For potential employment sites, are there other businesses located in close proximity and if so, do</p>

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Site Suitability – Considerations at Stage 2	
Consideration	Questions to Ask
	these businesses form a specific cluster, for example, Research & Development?
Previous Use	What is the previous use of the land? If the site is currently vacant, what was its last known use?
Flood Risk	Is the site located within Flood Zone 2 or 3a and/or at risk of surface water flooding (including allowance for climate change)? Is there a history of flooding? Can flood risk mitigation be achieved in accordance with national policy and guidance?
Ground Conditions/Topography	Is the site affected by any ground conditions? (e.g. unstable ground, steep slopes etc.)
Air Quality	Is the site within or near to an Air Quality Management Area (AQMA)? Could mitigation be achieved?
Land Contamination	Is the site affected by any potential land contamination? Will land contamination severely affect deliverability of the site or is there potential for mitigation?
Minerals and Waste	Is any part of the site within a Minerals Safeguarding or Consultation Area? Is the site located within 250 metres of a historic landfill site?
Tree Preservation Orders	Are there any Tree Preservations Orders on the site or on the boundary of the site? Could development avoid harm to them?
Archaeology	Does the site have any archaeological potential?

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Site Suitability – Considerations at Stage 2	
Consideration	Questions to Ask
	Would investigation or mitigation be needed?
Listed Buildings/Heritage Assets	Are there listed buildings or heritage assets within or near the site? Could development harm their significance or setting?
Conservation Areas	Is the site within a Conservation Area? Could development harm its character or setting?
Physical constraints (including utilities)	Are there physical constraints affecting the site, including the presence of major utilities (e.g. high-pressure pipelines, strategic water mains, overhead cables or fibre optic infrastructure)? Would these constraints limit the developable area or overall capacity of the site? Would development require diversion, easements or other mitigation measures, and are these likely to be feasible? Are there any constraints which cannot reasonably be mitigated or relocated, and which may prevent development of all or part of the site?
Public Rights of Way	Are there public rights running through the site or around the boundary of the site? Could development affect Public Rights of Way access? Are there any potential views of the site from any public rights of way?
Access and Connectivity	Does the site have safe access? Is the site well connected to public transport and services?
Heathrow Airport Safeguarding and Aviation Environment	Is the site within a Public Safety Zone or corridor where development is restricted for aviation safety?

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Site Suitability – Considerations at Stage 2	
Consideration	Questions to Ask
	Could building heights or uses conflict with aviation safety?
Aircraft Noise Exposure	Is the site exposed to aircraft noise levels that could constrain sensitive uses (e.g. dwellings, schools), and can effective mitigation be secured? Could effective mitigation be secured?
Major Hazard Zones	Is the site within or near Health and Safety Executive consultation zones? Would this restrict sensitive uses?
Potential Heathrow Airport Expansion Area	Is the site within the proposed expansion safeguarding area? Could uncertainty regarding Heathrow Airport expansion or safeguarding requirements delay or prevent development?
Strategic Employment Land	Is the site within a safeguarded employment area? Could mixed-use redevelopment be appropriate on the site?
Living Conditions in Town Centre Locations	Could acceptable living conditions be achieved (e.g., daylight, noise, air quality)? Would significant design compromises be needed to make the site suitable for housing?
Critical Infrastructure Dependencies	Would development rely on major transport, utilities or social infrastructure upgrades (including network capacity or reinforcement)? Could this affect timing or viability?

Table 3A: Site Suitability Assessment Criteria

Assessing Site Availability

10.20 The PPG (paragraph: 019 Reference ID: 3-019-20190722) states that a site is considered available for development when: *‘on the best information*

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available (confirmed by the call for sites and information from landowners and legal searches where appropriate), there is confidence that there are no legal or ownership impediments to development. For example, land controlled by a developer or landowner who has expressed an intention to develop may be considered available.'

- 10.21 During each HELAA update, all landowners will be contacted to confirm whether their site remains available and legal searches will be undertaken where necessary to identify any ownership or title constraints. Planning histories will also be reviewed to identify permissions or patterns that could influence availability, including stalled or lapsed applications. For completeness, sites with permissions granted after the HELAA base date may still be included in site proformas. Guidance on assessing these availability issues is set out in Table 3B.

Site Availability – Considerations at Stage 2	
Consideration	Questions to Ask
Ownership	<p>Is the site in single or multiple ownership?</p> <p>If multiple ownerships exist, could this prevent land assembly and delivery of the site as a whole?</p> <p>Is there evidence of a coordinated approach or agreements between owners to enable development?</p> <p>Are there any leasehold arrangements or operational uses that could delay delivery?</p>
Landowner Intention	<p>Has the landowner or developer confirmed they intend to bring the site forward within the plan period?</p> <p>Is there evidence of active marketing or development interest?</p>
Legal Constraints	<p>Are there any legal matters which may prevent the site from being available?</p>
Operational Constraints	<p>Is the site currently in active use (e.g., commercial, industrial, or leasehold arrangements)?</p> <p>Would these uses delay delivery or require relocation?</p>
Council-Owned Land	<p>Is the site owned by SBC?</p>

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Site Availability – Considerations at Stage 2	
Consideration	Questions to Ask
	Is it included in the Asset Disposals Strategy or One Public Estate programme?
Airport Safeguarding & Heathrow Expansion Uncertainty	Is the site within an airport safeguarding zone or Public Safety Zone? Could uncertainty about Heathrow Airport safeguarding or expansion affect the landowner’s intention or the timing of development?
Planning History	Has the site had repeated lapses or stalled permissions? Does this indicate viability or delivery risks?
Cross-Boundary Dependencies	Is the site near the borough boundary and reliant on shared infrastructure or agreements with neighbouring authorities? Could this affect timing or deliverability?

Table 3B: Site Availability Assessment Criteria

Assessing Site Achievability

10.22 As noted in the PPG (paragraph: 020 Reference ID: 3-020-20190722), a site is considered achievable for development where there is a reasonable prospect that the proposed type of development will come forward at a particular point in time. This is essentially a judgement about economic viability and the capacity of the developer to deliver the scheme.

10.23 In Slough, detailed viability assessments for every site are impractical and not required by national policy. Instead, a proportionate approach is applied, taking account of local market conditions and constraints. The factors considered when determining achievability are summarised in Table 3C.

Site Achievability – Considerations at Stage 2	
Consideration	Questions to Ask
Land Ownership and Delivery Capacity	Is there confidence that the site can be delivered by a developer or landowner with the capacity to bring it forward within the plan period? Are there delivery risks associated with ownership structure, land assembly, or reliance on third-party land?
Access	Is the site landlocked?

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Site Achievability – Considerations at Stage 2	
Consideration	Questions to Ask
	<p>Is there a viable/existing access or potential to create one?</p> <p>Are there factors that make access difficult (e.g., TPO trees)?</p>
Market Conditions	<p>Is the proposed type of development likely to be supported by current and anticipated market demand in Slough?</p> <p>Are there any factors that may reduce demand or delay delivery?</p>
Viability and Development Costs	<p>Are there abnormal costs (e.g. remediation, demolition, flood mitigation, utilities diversion) that could affect the viability of development and the likelihood of delivery within the plan period?</p> <p>Is there a reasonable prospect that these costs could be mitigated or addressed to enable delivery?</p>
Infrastructure and Utilities	<p>Would development rely on significant infrastructure provision or upgrades?</p> <p>Could constraints relating to transport, utilities or social infrastructure delay or affect delivery within the plan period?</p> <p>Could development impact the Strategic Road Network or local junctions?</p> <p>Is there sufficient capacity for utilities (water, electricity, drainage)?</p> <p>Could connection costs or upgrades affect viability?</p>
Strategic Policy Uncertainty	<p>Could strategic uncertainty (such as Heathrow Airport safeguarding or potential airport expansion) affect developer confidence, viability or the timing of delivery?</p>
Delivery Risks and Complexity	<p>Is the site large or complex, requiring phased delivery or multiple developers?</p> <p>Could this affect build-out rates, viability or the timing of delivery?</p>
Lead-in Times	<p>Are there factors that could result in significant lead-in times (e.g. relocation of existing uses, site clearance, infrastructure provision)?</p>

Site Achievability – Considerations at Stage 2	
Consideration	Questions to Ask
	Could these factors delay delivery beyond the plan period?

Table 3C: Achievability Assessment Criteria

Overcoming Constraints

- 10.24 All relevant constraints are recorded on the site proforma and where it is not obvious how these could be addressed, suggested mitigation measures are identified. Not all constraints prevent development from coming forward; however, they are recorded and assessed to inform a balanced and transparent judgement on site suitability, availability and achievability.
- 10.25 In addition to site-specific constraints, some strategic matters affect multiple sites and have wider implications for phasing and overall deliverability. Examples of strategic matters include policy and environmental designations (e.g., Green Belt, Burnham Beeches SAC), minerals safeguarding, major hazard zones, heritage and conservation areas, airport safeguarding and potential Heathrow Airport expansion, and infrastructure capacity constraints. Where relevant, these matters are considered in collaboration with infrastructure providers, statutory consultees and neighbouring authorities, and are taken into account in determining whether constraints can be realistically overcome within the plan period.

Assessing Site Deliverability and Developability

- 10.26 The conclusions on the suitability, availability and achievability of sites are used to inform a judgement as to whether a site can be considered deliverable or developable over the plan period.
- 10.27 The NPPF definition (Annex 2: Glossary) of deliverable is as follows:
‘To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:
- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will no longer be delivered within five years (for***

example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

- b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.”***

To be considered developable under the NPPF (Annex 2: Glossary):

‘Sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.’

This applies to sites that are estimated to deliver development in years 6-15.

10.28 In Slough, the assessment takes into account the factors in Tables 3A, 3B and 3C, including site-specific constraints, strategic matters (e.g., Green Belt, Burnham Beeches SAC, Heathrow safeguarding), and infrastructure dependencies. These factors are material to determining whether land is deliverable or developable and to calculating realistic development yield. Professional judgement is applied in all cases to determine the timing and likelihood of delivery, having regard to site-specific circumstances and available evidence.

10.29 Where sites are partly deliverable (i.e., part can be delivered in years 0-5) and partly developable (i.e., likely to be developed in years 6-15), the site is considered deliverable overall, but only the element expected within five years is counted in the five-year housing land supply. For example:

- A mixed-use site with employment floorspace likely to come forward in years 0-5 and housing in years 6–10 will be considered deliverable, but the housing will not be counted in the first five years.
- Likewise, for housing sites where part will be delivered in years 0-5 and part in years 6–10, only dwellings likely to be delivered in years 0-5 will be counted in the five-year supply, with the remainder counted in years 6-10.

10.30 Where there is uncertainty regarding delivery, a cautious approach will be applied to ensure that only sites with a reasonable prospect of delivery within five years contribute to the five-year housing land supply.

- 10.31 This approach ensures consistency with national policy while reflecting Slough's local circumstances, including phased delivery on complex regeneration sites and dependencies on infrastructure upgrades.

11. Stage 3: Windfall Assessment

- 11.1 Windfall sites are defined in the NPPF (Annex 2: Glossary) as, '**Sites not specifically identified in the development plan.**' The NPPF requires the identification and justification of any windfall allowance.
- 11.2 Paragraph 75 of the NPPF states: '*Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.*'
- 11.3 The PPG (paragraph: 023 Reference ID: 3-023-20190722) states that '*Local planning authorities have the ability to identify broad locations in years 6-15, which could include a windfall allowance.*' In practice, windfall allowances are typically applied only to housing land supply, as the PPG does not require the identification of windfall for economic development.

Windfall Allowance – Rationale

- 11.4 Sites identified through Stage 2 of the HELAA process can be allocated or safeguarded in the Local Plan. However, there will remain sites that have not been considered in the HELAA which could contribute towards a windfall allowance. The HELAA assesses sites with a capacity of at least five dwellings; therefore, small sites below this threshold represent a potential source of windfall supply.
- 11.5 While the HELAA generally excludes sites with a capacity of fewer than five dwellings, an exception applies in town centre locations. Due to their highly accessible nature and potential for high-density development, smaller sites in the town centre may be assessed where they can realistically deliver five or more dwellings or meet local policy objectives for efficient land use. This approach reflects national guidance on making the most effective use of land and ensures that opportunities for regeneration and intensification in sustainable locations are not overlooked.
- 11.6 In addition to small C3 housing sites, windfall delivery may also arise from changes of use, redevelopment and intensification of existing urban land that are not specifically identified through the HELAA process. The potential for windfalls from other sources should therefore be considered, including:

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- C2 residential institutions (e.g., care homes),
- Key worker accommodation (C2 and, in some cases, C1),
- C4 Houses in Multiple Occupation (HMOs) and certain Sui Generis HMOs.

11.7 These forms of development contribute to overall housing supply and reflect established patterns of delivery within the borough. The following section explores the evidence and assumptions underpinning the windfall allowance for Slough.

Historic Windfall Delivery Rates

11.8 To establish a realistic and proportionate windfall allowance, past delivery on small sites below the HELAA assessment threshold has been reviewed. For the purposes of the HELAA, small sites are defined as those capable of delivering fewer than five dwellings (i.e. 1–4 dwellings). These sites are not individually assessed through the HELAA and therefore represent a consistent and identifiable source of windfall supply during the plan period.

11.9 SBC's published monitoring data groups completions into **minor developments** (1–9 dwellings) and **major developments** (10 or more dwellings).

11.10 These categories do not directly align with HELAA definitions, as the Minor category includes both 1–4 dwellings schemes (which contribute to windfall supply) and 5–9 dwellings schemes (which fall within the HELAA threshold and are therefore not windfalls). The monitoring data is nevertheless a useful proxy for understanding the long-term contribution that smaller sites make to overall delivery.

11.11 In practice, it is not always possible to disaggregate monitoring data to isolate schemes of 1–4 dwellings. In such cases, professional judgement is applied to derive a proportionate and reasonable estimate of windfall delivery, informed by historic trends and local delivery patterns.

11.12 To ensure the windfall allowance is based on robust and relevant evidence, the analysis focuses, where possible, on distinguishing schemes of 1–4 dwellings from the wider Minor category, using available monitoring data, supplemented by professional judgement where necessary.

11.13 Historic data since 2010/11 has been reviewed to inform the approach to estimating windfall. This period reflects recent delivery trends and a sufficiently long timeframe to identify sustained patterns of windfall delivery.

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The data is drawn from SBC’s monitoring records. Table 4 summarises net housing completions in Slough between 2010/11 and 2024/25.

Monitoring Year	Small sites (1- 9 dwellings)	10+ dwellings	Total (net)
2010/11	72	389	461
2011/12	67	398	465
2012/13	64	421	485
2013/14	58	426	484
2014/15	96	411	507
2015/16	61	460	521
2016/17	62	543	605
2017/18	55	594	649
2018/19	60	473	534
2019/20	111	392	503
2020/21	65	436	501
2021/22	32	500	532
2022/23	28	294	322
2023/24	82	745	827
2024/25	28	176	204

Table 4: Net Housing Completions in Slough (2010/11–2024/25) by Scheme Size

- 11.14 The data demonstrates long-term trends in delivery, which are used to inform the methodology for deriving a windfall allowance. Although major development sites account for the majority of completions, smaller sites (recorded as 1–9 dwellings) have contributed consistently to annual delivery over the entire 15-year period. This represents a sustained and well-established pattern of delivery, supporting the inclusion of a windfall allowance. However, because the monitoring category includes both HELAA-eligible (1–4 dwellings) and HELAA-assessed (5–9 dwellings) sites, it cannot be used directly to calculate the windfall figure.
- 11.15 In line with the PPG requirement for compelling evidence, the windfall allowance is informed by the average level of small site delivery, adjusted to reflect only those developments falling below the HELAA threshold. As monitoring data is not disaggregated to distinguish between schemes of 1–4 dwellings and 5–9 dwellings, it is not possible to directly calculate windfall delivery from this dataset.
- 11.16 In response to this limitation, a cautious and proportionate approach has been applied. This involves using the historic average of small site completions (1–9 dwellings) as a baseline indicator and applying a reasoned

adjustment to reflect the proportion of schemes likely to fall below the HELAA threshold, informed by local delivery patterns and professional judgement. This ensures that windfall supply reflects only those developments that fall below the HELAA threshold and are therefore genuinely unplanned.

- 11.17 Given these limitations of the available data, the resulting windfall estimate should be regarded as a broad and proportionate estimate rather than a precise calculation.
- 11.18 The resulting windfall allowance will be applied to years 6–15 of the housing trajectory only, ensuring that double counting is avoided and that the allowance remains robust, proportionate and reflective of Slough’s constrained urban environment and historic delivery patterns.

Small Sites windfall allowance: 30 dwellings per annum

- 11.19 Having regard to the evidence, the windfall allowance is estimated at approximately 30 dwellings per annum.
- 11.20 It is considered that a windfall allowance of approximately 30 dwellings per annum delivered through smaller sites represents a cautious and proportionate estimate of future delivery, informed by long-term trends in historic delivery and the application of professional judgement to account for the HELAA site threshold.
- 11.21 This approach ensures that the windfall allowance is realistic, evidence-based and avoids overestimation, while reflecting Slough’s constrained urban environment and established patterns of small site delivery.

12. Stage 4: Assessment review

- 12.1 The PPG (paragraph: 024 Reference ID: 3-024-20190722) confirms that once all sites and broad locations have been assessed, their development potential should be collated to produce an indicative trajectory. This trajectory should set out how much housing and economic development can be delivered and over what timescales (e.g., within years 1-5, 6-10, and 11-15 and beyond).
- 12.2 The PPG (paragraph: 025 Reference ID: 3-025-20190722) is clear that if insufficient sites are identified to meet needs, it will be important to establish how needs might be met in adjoining areas through the process of preparing statements of common ground.:

'It may be concluded that insufficient sites / broad locations have been identified to meet objectively assessed needs, including the identified local housing need. In the first instance, strategic policy-making authorities will need to revisit their assessment, for example to carry out a further call for sites or changing assumptions about the development potential of particular sites to ensure these make the most efficient use of land. This may include applying a range of densities that reflect the accessibility and potential of different areas, especially for sites in town and City centres, and other locations that are well served by public transport.

If insufficient land remains, then it will be necessary to investigate how this shortfall can best be planned for. If there is clear evidence that strategic policies cannot meet the needs of the area, factoring in the constraints, it will be important to establish how needs might be met in adjoining areas through the process of preparing statements of common ground, and in accordance with the duty to cooperate [not saved].'

- 12.3 This guidance underlines the importance of maintaining flexibility in the HELAA process. For Slough, this means that if the indicative trajectory shows insufficient land to meet identified housing and economic needs, the Council will revisit assumptions on site capacity, density, and deliverability, and may undertake further Calls for Sites. Where constraints cannot be overcome, the HELAA will inform strategic discussions with neighbouring authorities, including through Statements of Common Ground, to address any shortfall.
- 12.4 The outputs from this stage will inform the HELAA results, including the site assessments, capacity estimates and indicative trajectory, and will form the basis of the Final Evidence Base, which is reported in Stage 5. This ensures that the HELAA provides a transparent, proportionate and auditable foundation for the Local Plan and supports the identification of a realistic housing land supply.

13. Stage 5: Final Evidence Base

Data Outputs

- 13.1 As specified in the PPG (paragraph: 026 Reference ID: 3-026-20190722), each published HELAA will include the following outputs:
- **Comprehensive site list** – all sites and broad locations considered, cross-referenced to maps.
 - **Detailed site assessments**, including:
 - Evidence for discounting sites.

- For sites considered suitable, available, and achievable: potential type and quantity of development, reasonable build-out rate estimates, and how delivery barriers could be overcome and when.
 - **Indicative development trajectory** – showing anticipated delivery across years 1–5, 6–10, and 11–15+, based on available evidence.
- 13.2 The inclusion of a site in the HELAA Report does not constitute an allocation for development, grant planning permission, or imply that permission will be granted. Any proposed development coming forward ahead of the new plan must be considered against the policies in the adopted Development Plan (and the NPPF) through the planning application process.

14. Monitoring and Review

- 14.1 The Council will continue to accept new sites outside formal Calls for Sites to ensure that the evidence base remains up to date. At present, site submissions and updated information are monitored annually. These provide an up-to-date evidence base for plan-making.
- 14.2 The sites considered in the HELAA Report will be reviewed and their assessment updated to reflect changes in site circumstances, planning permissions, completions and new site submissions according to emerging national policy and (CULP) guidance. Sites identified are expected to inform the evidence base for the Local Plan.
- 14.3 The HELAA methodology may be superseded as changes to national policy, the NPPF or guidance, and the implementation of the Government's proposed site identification and assessment processes become more established.

15. Summary

- 15.1 The HELAA methodology, and its application, do not allocate land for development or determine planning applications, but provide a robust and transparent evidence base to inform decision-making through the Local Plan process.
- 15.2 A report presenting the outcomes of applying this methodology, including site assessments and development capacity, will be published. The intention is that this can also support five-year housing land supply calculations in advance of the new plan being adopted.

16. Appendix 1: Consultation Response Form

Response form for Housing and Economic Land Availability Assessment (HELAA) Methodology: Draft for Consultation

Slough Borough Council is consulting on its proposed methodology for assessing land for housing and economic development through the Housing and Economic Land Availability Assessment (HELAA).

The HELAA forms a key part of the Local Plan evidence base. It identifies potential development sites and assesses whether they are suitable, available and achievable.

The Council is particularly interested in views on:

- Site size thresholds
- The approach to assessing constraints
- The proposed windfall allowance
- The overall assessment methodology

All responses will be used to inform the final HELAA methodology.

This consultation will run from Monday 8 June 2026 to Monday 29 June 2026 (11:59pm).

1. Privacy Notice: Please confirm that you understand and agree the Council's process, terms and conditions for holding and using the information you provide. Information supplied will be held and used in accordance with the GDPR. Personal information (primarily private contact details) will not be publicly available. It will be processed and handled in accordance with the Council's privacy policy available to view on the Council's website: <https://www.slough.gov.uk/privacy>.

Agree

Consent to contact you about the Local Plan

2. Do you consent to us adding you to the Local Plan contact list to be notified of future updates on the Slough Local Plan?

You can unsubscribe at any time.

Yes No

Your Contact details

Question 3 is required for us to consider your representation valid, and notify you of updates to the methodology and its use. We keep your details for Local Plan related consultations only, and follow the Council's privacy standards.

Representations may still be considered without full contact details, but may not be treated as a valid representation.

3. Name

First name (Required) _____

Surname (Required) _____

4. Email address

You will receive an acknowledgement email when you submit your response. If you do not receive this then email planningpolicy@slough.gov.uk.

Email (Required) _____

5. Postal address

Address line 1 _____

Address line 2 _____

Address line 3 _____

Town (Required) _____

County _____

Postcode (Required) _____

6. Company or Organisation

7. Respondent type

- Owner of (all or part of) the site
 - Planning Consultant
 - Land Agent
 - Developer
 - Land Promoter
 - Community Group
 - Registered Provider
 - Local Resident
 - Local Business
 - Statutory Consultee (e.g. Environment Agency, utility provider)
 - Other - please specify
-

8. Are you promoting a site separately that you would like the Council to consider? This will not affect your response to this methodology consultation

- Yes No

Overview of approach

9. Do you consider the overall HELAA methodology to be appropriate and robust?

- Yes No Don't know

Please provide comments / evidence to support your answer:

10. Which part(s) of the HELAA does your response relate to? (Select all that apply)

- Stage 1 – Site identification
- Stage 2 – Site assessment methodology
- Stage 3 – Windfall assessment
- Stage 4 – Assessment review
- Stage 5 – Final evidence base Whole document

Other (please specify) _____

Key Methodology questions

11. The HELAA identifies constraints at Stage 1 and assesses them in more detail at Stage 2 to determine whether they can be mitigated. Do you agree with this approach?

- Yes No Don't know

Please provide comments / evidence to support your answer:

12. Site Size Thresholds: The HELAA applies a threshold of 5 dwellings for housing sites. Do you agree with this approach?

- Yes No Don't know

Please provide comments / evidence to support your answer:

13. Windfall Allowance (Approach)

The windfall allowance is based on historic delivery trends and professional judgement. Do you agree with this approach

Yes No Don't know

Please provide comments / evidence to support your answer:

14. Windfall Allowance (Proposed Figure)

The HELAA proposes a windfall allowance of approximately 30 dwellings per annum. Do you agree with this estimate?

Yes No Don't know

Please provide comments / evidence to support your answer:

15. Consideration of non-residential uses

The methodology also address non-residential uses including employment land to provide jobs. Do you agree with this approach?

Yes No Don't know

Please provide comments / evidence to support your answer:

Status of the methodology and consultation

16. The Council is progressing its plan under the new system. The methodology will be applied and updated until replaced (unless superseded by national policy or guidance). The Consultation findings will inform early plan preparation, including evidence base development and work to support Gateway 1 in October 2026. Do you agree with this approach?

Yes

No

Don't know

Please provide comments / evidence to support your answer:

17. Do you have any further comments on the HELAA methodology?

Almost done...

You are about to submit your response. By clicking 'Submit Response' you give us permission to analyse and include your response in our results. After you click Submit, you will no longer be able to go back and change any of your answers.

Please tick this box if you would like to receive a copy of your response by email.
(You can also download a copy on the next page without receiving an email)

Housing and Economic Land Availability Assessment (HELAA) Methodology

Draft for Consultation