

Sustainability Appraisal of the Proposed Release of Green Belt Sites for Family Housing

November 2021

Local Plan for Slough (regulation 18)

Local Plan for Slough (2016 -2040)

Sustainability Appraisal

of the

Proposed Release of Green Belt

Sites for Family Housing

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1 Introduction

- 1.1 The Council carrying out a consultation on the *Proposed Release of Green Belt Sites for Family Housing (Nov 2021)* as the latest stage in the preparation of the Local Plan for Slough (2016 – 2040). The purpose of this document is to provide a Sustainability Appraisal (SA) of these proposals.
- 1.2 A Sustainability Appraisal (SA) has to be carried out throughout the preparation of a plan in order to promote sustainable development. The purpose of this exercise is to assess the extent to which the elements of the emerging plan address sustainability issues by highlighting the potential significant social economic and environmental effects. It also involves the consideration of reasonable alternatives.
- 1.3 The “Release of Green Belt land for housing” was one of the options considered in the Local Plan *Issues and Options Consultation Document (2017)*. It also formed part of the *Emerging Preferred Spatial Strategy (2018)* and the *Proposed Spatial Strategy (2020)*.
- 1.4 As a result this was assessed *Sustainability Appraisal of the Proposed Spatial Strategy (Nov 2020)* using the established sustainability framework for Slough. It is therefore considered that this can be used as the basis of the Sustainability Appraisal of the *Proposed Release of Green Belt Sites for Family Housing*.
- 1.5 Carrying out a Sustainability Appraisal is an on-going iterative process. As a result this report explains how the Sustainability Framework for Slough has been developed, how the various Local Plan Options have been tested and how a number of alternatives have been

assessed. All of this has then been used to help predict and evaluate the extent to which the *Proposed Release of Green Belt Sites for Family Housing* will help to achieve the identified environmental, economic and social objectives.

- 1.6 The main conclusion from this Sustainability Appraisal is that the development of around 1,000 houses in the Green Belt, as part of the Proposed Spatial Strategy (Alternative e), is the most sustainable option for the Local Plan. Policies and proposals will have to be developed to help to mitigate some of the adverse effects.
- 1.7 It should be noted that although the Proposed Release of Green Belt Sites for Family Housing identifies ten possible sites, it does not make any allocations at this stage. There are also only limited technical details about these site and no policies have yet been developed. As a result it is too early to identify what mitigation measures may be needed to reduce the adverse effects. The final version of the Local Plan will contain policies and site allocations and this will be the subject of further Sustainability Appraisals.
- 1.8 This Sustainability Appraisal will be subject to a six week consultation period from 5th November to 17th December 2021.
- 1.9 Further details about the *Proposed Release of Green Belt Sites for Family Housing* and the consultation exercise, including how you can comment on this document can be found on www.slough.citizenspace.com.

2 Habitat Regulations

- 2.1 A Habitat Regulations Screening Document was produced in January 2017

alongside the Issues and Options document.

- 2.2 The screening report concluded that, based on the information currently available in the Issues and Options Consultation, a likely significant effect on the qualifying features of Burnham Beeches Special Area of Conservation (SAC) cannot be effectively ruled out.
- 2.3 The preparation of the proposed Spatial Strategy has taken into account the need to protect the Burnham Beeches SAC. The Strategy seeks to limit large scale development in the part of Slough nearest Burnham Beeches. And proposals to retain and enhance open spaces to provide informal recreation space with more natural habitat for local residents will limit the number of visits to Burnham Beeches by future residents. Future detailed policies will be produced in order to deliver the necessary mitigation within the Borough.
- 2.4 Some of the sites identified for possible release from the Green Belt for family housing are within the 5.2 km Burnham Beeches buffer zone. As a result they will only be able to be developed if they provide a suitable mitigation package.

3 The Sustainability Appraisal Process

- 3.1 A Sustainability Appraisal is a systematic process that has to be carried out during the preparation of a plan in order to promote sustainable development. It sets out a framework for assessing the extent to which the emerging plan will help to achieve the identified environmental, economic and social objectives.
- 3.2 Section 19 of the Planning and Compulsory Purchase Act 2004 requires a local planning authority to carry out a sustainability appraisal of each of the proposals in a Local Plan during its preparation. More generally, section 39 of the Act requires that the authority preparing a Local Plan must do so “with the objective of contributing to the achievement of sustainable development”.
- 3.3 Planning authorities are required to carry out a Strategic Environmental Assessment (SEA) of Local Development Documents in accordance with the requirements of a European Directive (2001/42/EC). Sustainability Appraisal fully incorporates the European SEA requirements, but expands it to also take account of social and economic matters. Thus, the requirements of the SEA Directive also apply to the Sustainability Appraisal.
- 3.4 The guidance emphasises that a Sustainability Appraisal is an iterative process which identifies and reports on the likely significant effects of the plan and the extent to which its implementation will achieve the social, environmental and economic objectives by which sustainable development can be defined. The intention is that SA is fully integrated into the plan making process from the earliest stages, both informing and being informed by it.
- 3.5 Sustainability Appraisal should inform the evaluation of options and provide a key means to demonstrate the appropriateness of the Local Plan given reasonable alternatives.
- 3.6 The guidance also sets out a requirement for the preparation of a series of reports which are set out in Table 1 below.

Table 1 Sustainability Appraisal Preparation Process

STAGE A: Setting the context and objectives, establishing the baseline and deciding on the scope		
A1		Identifying other relevant plans, programmes, and sustainability objectives
A2		Collecting baseline information
A3		Identify key sustainability issues and problems
A4		Developing the SA Framework
A5		Consulting on the scope of the SA
	Output	Consultation on a Scoping Report
STAGE B: Developing and refining options and assessing effects		
B1		Testing the DPD objectives against the SA Framework
B2		Developing the DPD options
B3		Predicting the effects of the DPD
B4		Evaluating the effects of the DPD
B6		Proposing measures to monitor the significant effects of implementing the DPD
STAGE C: Preparing the SA Report		
C1		Preparing the SA Report
	Output	A Draft Sustainability Report
STAGE D: Consulting on the DPD and SA Report		
D1		Public participation on the draft DPD and SA report
	Output	Consulting on the Draft Sustainability Report
D2 (i)		Appraising significant changes
D2 (ii)		Appraising significant changes resulting from representations
D3		Making decisions and providing information
	Output	A Sustainability Report
STAGE E: Monitoring the significant effects of implementing the DPD		
E1		Finalising aims and methods for monitoring
E2		Responding to adverse effects
	Output	Information in the Annual Monitoring Report

3.7 This process has been used as the basis for all of the Sustainability Appraisal work that has been carried out for the Local Plan and has been used to structure this document.

3.8 The Sustainability Appraisal of the Local

Plan for Slough is complicated by the fact that some of the Spatial Options that were developed in the Issues and Options consultation involved developing areas that are outside the geographical area of the Plan. At the same time one of the key

components of the Proposed Spatial Strategy is “promoting the cross border expansion of Slough to meet unmet housing needs”. These have been included in the Sustainability Appraisals as they form part of the alternatives but the development of any areas outside of the Borough cannot be delivered through the Slough Local Plan.

- 3.9 It should be noted that the results of the SA can only give a considered view of the relative sustainability of alternative proposals. It still remains the role of the plan maker to determine which proposals are taken forward, taking account of all relevant factors including the results of the SA.

4 Development of the Local Plan for Slough

- 4.1 The preparation of the Local Plan began with the production of a *Sustainability Appraisal Scoping Report* in November 2016. This created the Sustainability Framework which is explained in more detail below.
- 4.2 This was followed by an *Issues and Options Consultation Document* (Feb 2017). One of the options considered was Option H (Release of Green Belt land for housing) which identified the ten possible sites which are the subject of the current consultation. This was the subject of a *Sustainability Appraisal* (Jan 2017) which assessed the draft “Objectives” and “Spatial Options”.
- 4.3 In February 2018 the Council produced an *Emerging Preferred Spatial Strategy* which was accompanied by an *Interim Sustainability Appraisal*. Neither of these were the subject of public consultation.
- 4.4 In November 2020 the Council produced a *Proposed Spatial Strategy*. This included the possibility of releasing Green Belt sites for housing as part strategy for “selecting other key locations for appropriate sustainable development”. This once again identified the same ten possible sites which are the subject of the current consultation.
- 4.5 This was accompanied by a *Sustainability Appraisal of the Proposed Spatial Strategy* which was the subject of public consultation in November 2020.
- 4.6 The appraisal set out in this document builds upon the results of all of the previous Sustainability Appraisals of the Local Plan in order to come its conclusions.
- 4.7 In doing so it follows the Sustainability Preparation Process (Table 1) and the Sustainability Appraisal Framework for Slough (Table 6 In the Appendix) which was developed in the *Sustainability Appraisal Scoping Report* (Nov 2016).
- 4.8 This document also relies upon the assessment of the draft “Objectives” and “Spatial Options” which was carried out in the *Sustainability Appraisal of the Issues and Options* (Jan 2017) (see Table 7 in Appendix)
- 4.9 As explained above, the possibility of releasing Green Belt sites for housing, and the ten possible sites, were identified in the *Proposed Spatial Strategy* (Nov 2020) As a result this was assessed *Sustainability Appraisal of the Issues and Options* (Jan 2017) using the framework described above. The release of the Green Belt sites was also assessed in the *Sustainability Appraisal of the Proposed Spatial Strategy* which was the subject of public consultation in November 2020. As a result it is considered that current assessment of the proposed release of Green Belt land for family housing can be based upon previous Appraisals.

4.10 Carrying out a Sustainability Appraisal is an on-going iterative process. As a result the next sections explain in more detail what conclusions have been reached about the various planning documents that have been prepared so far. The overall results of this appraisal of the Proposed Release of Green Belt Sites for Family Housing are set out in the conclusions below.

Carrying out the sustainability appraisal

5 The Scoping Report (Stage A)

- 5.1 Stage A of the Sustainability Appraisal preparation process, as set out in Table 1 above, involves setting the context and objectives, establishing the baseline and deciding on the scope. As a result the Council commissioned Lepus Consulting to produce a *draft Sustainability Appraisal Scoping Report* in November 2016.
- 5.2 This created a Slough focussed Sustainability Appraisal Framework that contains 10 Sustainability Appraisal Objectives which are reproduced in the first column of Table 7 in the Appendix. These have been used to assess the evolving Local Plan.
- 5.3 *The full Scoping Report* document is available at www.slough.gov.uk/planning-policy. This identified that the key sustainability issue for the SA was to guide the Local Plan by considering the relative alternatives for meeting Slough's needs within the Borough, outside the Borough (either adjoining or further away) or not meeting the need in full.

The Scoping Report was consulted upon as part of the Issues and Options consultation exercise in February 2017. No fundamental issues with the report

were raised during the consultation. As a result it is considered that the SA Framework and the conclusion of the Scoping Report are still relevant.

6 Testing the Local Plan objectives against the Sustainability Appraisal Framework (Stage B1)

- 6.1 The Issues and Options Consultation Document (2017) contained fourteen "Objectives" for the Local Plan which gives an indication as to how the "Vision" for Slough can be achieved through the Review of the Local Plan.
- 6.2 These Local Plan objectives were tested against the SA Framework in order to predict and evaluate the "potentially significant" positive or negative effects of these Objectives on the plan area *and the key sustainability issues identified in the Scoping Report*.
- 6.3 Table 5 in appendix 1 shows that there is generally a positive compatibility between the Local Plan "Objectives" and the Sustainability "Objectives", but the challenge was how to balance competing pressures for scarce resources, particularly to deliver the Objectively Assessed Housing Need and employment land requirements to meet its economic potential, recognizing that both of these will put pressure on the environment, particularly as a result of transport pressures, climate change, health and pollution..
- 6.4 The four sustainability Objectives which could potentially have a significant conflict with the scale of housing and other development proposed in the Issues and Options are SA Objective 1 (transport), SA Objective 3 (Climate Change), SA Objective 5 (health) and SA Objective 10

(Pollution).

- 6.5 The analysis of the issues facing Slough showed, “it will be very difficult to meet the Objectively Assessed Housing Need and employment needs because of a shortage of developable land, the problems of traffic congestion and environmental constraints”.

7 Testing the Local Plan objectives against the Sustainability Appraisal Framework (Stage B1)

- 7.1 Stage B1 of the Sustainability Appraisal process requires the Local Plan Objectives to be tested against the Sustainability Appraisal Framework.
- 7.2 This was carried out in January 2017 in the *Sustainability Appraisal of the Issues and Options* consultation document.
- 7.3 This involved testing the “Local Plan Objectives” and the Spatial Options against the SA Framework and predicting and evaluating the “potentially significant” positive or negative effects of these on the plan area *and the associated key sustainability issues emerging from SA Stages A1 and A2*. It also involved the consideration of alternatives and the evolution of the area without the plan. In some cases the compatibility of the Local Plan with the SA Objectives could not be predicted because of uncertainty or lack of information.
- 7.4 The Issues and Options Consultation Document contained fourteen “Objectives” for the Local Plan which gives an indication as to how the “Vision” for Slough can be achieved through the Review of the Local Plan. These Local Plan Objectives are listed as A to N in Table 2. The compatibility of each option

with the SA objectives is summarised in the matrix alongside them.

- 7.5 Table 5 in appendix 1 shows that there is generally a positive compatibility between the Local Plan “Objectives” and the Sustainability “Objectives”, but the challenge was how to balance competing pressures for scarce resources, particularly to deliver the Objectively Assessed Housing Need and employment land requirements to meet its economic potential, recognizing that both of these will put pressure on the environment particularly as a result of transport pressures, climate change, health and pollution.
- 7.6 The four sustainability Objectives which could potentially have a significant conflict with the scale of housing and other development proposed in the Issues and Options are SA Objective 1 (transport), SA Objective 3 (Climate Change), SA Objective 5 (health) and SA Objective 10 (Pollution).
- 7.7 The analysis of the issues facing Slough showed, “it will be very difficult to meet the Objectively Assessed Housing Need and employment needs because of a shortage of developable land, the problems of traffic congestion and environmental constraints”.

Changes to the Local Plan Objectives in the Proposed Spatial Strategy (October 2020)

- 7.8 The Local Plan Objectives have been slightly modified since the Issues and Options consultation and the production of the emerging preferred spatial strategy. The main changes to the Local Plan Objectives in the Proposed Spatial Strategy were:
- **Objective A:** updated housing needs number to 893

- **Objective C:** updated to reflect Centre of Slough Regeneration Framework
 - **Objective D:** updated to reflect the Inclusive Growth strategy
 - **Objective F:** removed reference to growth at Heathrow
 - **Objective G:** reworded to reflect Transport Vision.
- Objective M:** reworded and added in reference to energy use.

7.9 Table 2 below shows the changes in red to the Local Plan objectives. Overall the assessment of the SA objectives against the new modified Local Plan objectives remains unchanged due to no significant changes only revised wording. There is a slight decrease in the Objectively Assessed Housing Needs as a result of the use of the Government’s standard methodology but this minor.

Table 2 Testing the new Local Plan Objectives against the Sustainability Appraisal Framework

SA Objective Local Plan Objective	1-Transport	2-Biodiversity	3-Climate Change	4-Economy	5-Health	6-Cultural Heritage	7- Housing	8-Landscape	9-Use of resources	10-Pollution
A. To meet the Objectively Assessed Housing Need (OAHN) of 927 893 dwellings per annum within the Borough or as close as possible to where the needs arises within a balanced housing market	+/-	?	?	?	+/-	0	+	?	?	?
B. To provide new homes of an appropriate mix, type and tenure for Slough’s population that are designed and built to a high quality and environmentally sound standard.	0	0	+	0	+	0	+	?	+	+
C. .To deliver 21 st century Town Centre delivering major office development, revitalised shopping and leisure facilities, a strengthened cultural offer and a range of new homes To support innovation, growth and regeneration and ensure the Town Centre is the focus for high density housing and major retail, leisure, office and cultural development	+	0	0	+	0	0	+	0	+	?/-
D. To ensure Slough’s economy creates wealth inclusive growth, attracts investment and retains its role as a remains a competitive economic	?	0	?	+	0	0	0	0	?	0

Local Plan Objective \ SA Objective	1-Transport	2-Biodiversity	3-Climate Change	4-Economy	5-Health	6-Cultural Heritage	7- Housing	8-Landscape	9-Use of resources	10-Pollution
<i>powerhouse by retaining its multinational HQs, having a diverse resilient economic base, and including opportunities for business start-ups and Smart technology.</i>										
E. <i>To create 15,000 jobs supported by a competitive local workforce who have the skills to meet businesses' changing needs.</i>	+/-	0	0	+	?	0	0	0	?	?/-
F. <i>To ensure Crossrail and the Western Rail Link to Heathrow and growth at Heathrow deliver benefits for residents and businesses across the Borough. .</i>	+	0	+/-	0	?	0	0	0	0	?/-
G. <i>Make public transport the most dominant mode of travel, ensure walking, cycling are attractive options by To encourage sustainable modes of travel such as walking, cycling and public transport, reducing the need to travel by making, make non-car modes the best choice for short journeys and tackle traffic congestion.</i>	+	0	+	0	+	0	0	0	0	+
H. <i>To improve the health and well-being of all residents and reduce deprivation through providing opportunities for our residents to live positive, healthy, active and independent lives</i>	0	0	0	0	+	0	+	0	0	+
I. <i>To provide for community infrastructure and facilities in appropriate and accessible locations that supports a viable and vibrant network of services.</i>	+	0	+	0	+	0	0	0	+	?
J <i>To make Slough feel like a safe place through minimising the opportunity for crime and antisocial behaviour.</i>	0	0	0	0	+	0	0	0	0	0
K <i>To improve the image and attractiveness of the town through insisting on high quality design for all new buildings and enhancing the public realm. To support the vitality, viability, distinctiveness of local centres and ensure sustainable that residential</i>	0	0	0	+	0	0	+	+	0	0

Local Plan Objective \ SA Objective	1-Transport	2-Biodiversity	3-Climate Change	4-Economy	5-Health	6-Cultural Heritage	7- Housing	8-Landscape	9-Use of resources	10-Pollution
<i>neighbourhoods retain a distinct sense of place.</i>										
<i>L To increase opportunities for leisure and recreation and improve the quality and use of Slough’s parks and open green spaces and the links to these and the surrounding countryside including the Colne Valley Regional Park.</i>	0	0	0	0	+	+	0	+	0	0
<i>M Protecting and enhancing the natural environment, and adapting and mitigating the effects of climate change, reducing energy use, addressing flood risk, carbon emissions and, energy use and pollution and minimise its effects through protecting and enhancing the Borough’s biodiversity and water environment, and addressing flood risk, carbon emissions and pollution.</i>	0	+	+	?	+	0	0	+	+	+
<i>N To protect maintain and enhance those elements of the built and natural environment of local or historic value</i>	0	+	0	0	0	+	0	+	?	0

7.10 This shows that there is still a generally positive compatibility between the Local Plan “Objectives” and the Sustainability “Objectives” and confirms that the Sustainability Framework remains fit for purpose.

8 Developing Local Plan Options (Stage B2)

8.1 Stage B2 of the Sustainability Appraisal process involves developing and refining options for the Local Plan.

8.2 The Sustainability Appraisal (incorporating SEA) requires a

comparison to be carried out of the options open to plan-makers for delivering the plan’s objectives. Specifically the SEA Directive states that the report should consider “reasonable alternatives taking into account the objectives and the geographical scope of the plan” and it should give “an outline of the reasons for selecting the alternatives dealt with”.

Issues and Options Consultation

8.3 Twelve Spatial Options were identified for the Local Plan Issues and Options consultation which are listed in Table 3 below.

Table 3 Local Plan Spatial Options

A. Expand the centre of Slough (upwards and outwards)
B. Expand the Langley Centre (to include land around the railway station)
C. Create a new residential neighbourhood on the Akzo Nobel and National Grid sites west of the Uxbridge Road
D. Regeneration of the selected areas: D1 - Canal basin D2 – New Cippenham Central Strip, Bath Road D3 – Chalvey regeneration
E. Estate Renewal
F. Intensification of the suburbs
G. Redevelop Existing Business Areas for housing
H. Release land from the Green Belt for housing (edge of Slough)
I. Release land from the Green Belt for employment (Heathrow related development in Colnbrook and Poyle)
J. Expansion of Slough J1 – Northern expansion into South Bucks (Garden Suburb) J2 – Southern expansion into Windsor & Maidenhead (small sites)
K. Build in other areas outside of Slough

8.4 The most significant conclusion from the consultation on the Issues and Options Document was that there are no reasonable spatial option, or combination of options that would allow Slough to meet all of its identified housing and employment land needs within its boundaries.

Other Alternatives

8.5 The Issues and Options consultation recognized that most options would be needed in order to deliver the Local Plan Objectives. As such the SA concluded that, “while the consultation document

contains a number of options in most cases they do not represent alternatives” and it would be difficult for Slough to meet its housing and employment needs in full.

8.6 Since Objective A of the Local Plan is “to meet its housing needs in full as close to where they arise as possible”, it was considered that further testing of the options was needed. This led to three “Alternatives” being identified which were:

- a) Meeting more housing needs within the Borough through intensification of Spatial Option A (expand the centre of Slough), and carrying forward Spatial Options F

(intensify the suburbs) and G (releasing Existing Business Areas for housing).

- b) Planning for a shortfall in the Borough through Option K (meeting employment land and housing needs elsewhere outside of Slough).
- c) Planning for a shortfall in housing in the Borough through not carrying forward Spatial Options F (intensify the suburbs) and G (releasing Existing Business Areas for housing) but promoting Spatial Option J1 (meeting housing needs adjoining the Borough in a northern expansion).

8.7 Alternative (a) would involve meeting housing needs within the Borough through a combination of increasing the quantum of housing development in the town centre, intensifying the suburbs and redeveloping Existing Business Areas for housing.

8.8 Alternatives b) and c) involve planning for a shortfall of housing and employment in the Borough but building outside of the Borough.

Emerging Spatial Strategy

8.9 The “*Emerging*” *Spatial Strategy*”, which was produced in 2018 effectively consisted of “Alternative c”. This planned for a shortfall of housing in the Borough but promoted Spatial Options A; B; C; D; E; H; I; and J1 which were combined into the following five elements. for the “emerging” Plan:

- **Delivering** major comprehensive redevelopment within the “Centre of Slough”;
- **Selecting** other key locations for appropriate development;

- **Protecting** the built and natural environment of Slough including the suburbs;
- **Accommodating** the proposed third runway at Heathrow and mitigating the impact;
- **Promoting** the northern expansion of Slough in the form of a “Garden Suburb”;

Proposed Spatial Strategy

8.10 The *Proposed Spatial Strategy* (2020) which is “Alternative d” made a number of changes to the previous one. The main difference was that it was no longer involved accommodating the proposed third runway because it became clear that the expansion of Heathrow airport was not likely to go ahead in the short to medium term..

8.11 As a result the new Proposed Spatial Strategy had the following five key components:

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

8.12 For the purposes of the Sustainability Appraisal, these components can be equated to some of the Spatial Options that were identified at the Issues and Options stage as explained below.

8.13 “*Delivering major comprehensive*

redevelopment within the “Centre of Slough” is the equivalent of Spatial Option A (expand the centre of Slough), Spatial Option C (create a new residential neighbourhood on the Akzo Nobel and National Grid sites) and Spatial Option D1 (canal basin).

- 8.14 “*Selecting other key locations for appropriate sustainable development*” is the equivalent of Spatial Option D2 (new Cippenham Central Strip), Spatial Option D3 (Chalvey regeneration) and Spatial Option H (release land from the Green Belt for housing on the edge of Slough).
- 8.15 “Enhancing our distinct suburbs, vibrant neighbourhood centres and environmental assets” is combination of a “do nothing” option along with Spatial Option E (estate renewal).
- 8.16 “Protecting the “Strategic Gap” between Slough and Greater London” is a “do nothing” option.
- 8.17 “*Promoting the cross border expansion of Slough to meet unmet housing needs*” is the equivalent of Spatial Option K (build in other areas outside of Slough).
- 8.18 As a result it can be seen that the proposed Spatial Strategy (alternative d) consisted of Spatial Options A,C,D1,D2,D3, E, H, K and “do nothing” in some areas.
- 8.19 The Spatial Options that were not taken forward were:
- B (expand the Langley Centre
 - F (intensification of the suburbs)
 - G (redevelop Existing Business Areas for housing)
 - I (release land from the Green Belt for Heathrow related employment development in Colnbrook and Poyle)
 - J1 (northern expansion of Slough into South Bucks)

J2 (southern expansion of Slough into Windsor and Maidenhead)

- 8.20 The main outcome of the Proposed Spatial Strategy (Alternative d) is that nearly all of the growth will take place in the centre of Slough. The suburban areas would be protected and there would be no loss of public open space.

Proposed Release of Green Belt Sites for Family Housing

- 8.21 The current *Proposed Release of Green Belt sites for Family Housing (2021)* is a refinement of the Spatial Strategy.
- 8.22 For the purposes of this Sustainability Appraisal it is assumed that whereas the Proposed Spatial Strategy considered releasing some green field/Green Belt land for residential development, this will actually deliver up to 1,000 houses and so forms “Alternative e”.
- 8.23 All of these “Alternatives” which have been developed at various stages of the preparation of the Local Plan have been assessed as explained below.

9 Predicting and evaluating the effects of the Spatial Options using the Sustainability Appraisal Objectives (Stages B3 and B4)

- 9.1 Stages B3 and B4 of the Sustainability Appraisal process involves predicting and evaluating the effects of each stage of the preparation of the Local Plan for Slough. An explanation as to how each of the options and alternatives that have made up the different versions of the Local Plan is set out below.

Issues and Options Consultation (2017)

9.2 As explained above the Issues and Options consultation generated twelve Local Plan Spatial Options as shown in Table 3 above. An assessment of

compatibility of each Spatial Option with the SA objectives was carried out as part of the Issues and Options consultation to identify any positive or negative impacts against the social, economic and environmental objectives. The results can be seen in the matrix in Table 4 below.

Table 4 -The Appraisal of the Local Plan Spatial Options with the Sustainability Appraisal Objectives

SA objective	Spatial Options												Summary note or comment	
	A: Expand the centre of Slough	B: Expand Langley centre	C: New residential neighbourhood west of the Uxbridge Road	D: Regeneration of three selected areas	E: Estate Renewal	F: Intensification of the suburb	G: Redevelop Existing Business Areas for housing	H: Release Green Belt for housing	I: Release Green Belt for employment	J: 1 Area of search South Bucks	J2: Area of search Windsor and Maidenhead	K: build in other areas		Do nothing (eg housing, open space, employment)
1. Transport and accessibility: Improve the efficiency of transport networks by increasing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel.	+	+	+	?	?	?	?	?	-	?	?	-	-	Transportation infrastructure; Traffic flows; Walking and cycling; Accessibility.
2. Biodiversity and geodiversity: Protect, enhance and manage biodiversity and geodiversity.	0	0	0	0	0	?	0	?	?	?	?	?	0	Habitats; Species; Nature conservation designations;
3. Climate change: Minimise the borough's contribution to climate change, and consider methods to adapt to climate change.	?	?	?	?/-	?	?	?	?/ -	?/ -	? /-	?/ -	?	?	Climate change adaptation; Flooding.

SA objective	Spatial Options													Summary note or comment
	A:Expand the centre of Slough	B: Expand Langley centre	C:New residential neighbourhood west of the Uxbridge Road	D:Regeneration of three selected areas	E:Estate Renewal	F:Intensification of the suburb	G:Redevelop Existing Business Areas for housing	H:Release Green Belt for housing	I:Release Green Belt for employment	J:1 Area of search South Bucks	J2:Area of search Windsor and Maidenhead	K: build in other areas	Do nothing (eg housing, open space, employment)	
4. Economy: Develop a dynamic, diverse and resilient economy that excels in innovation with higher value, lower impact activities.	+	-	-	?	0	0	-	0	+	0	0	0	-	Economic Development Need Economic performance; Sites and premises.
5. Health: Safeguard and improve community health, safety and well-being.	0	0	0	0	0	0	0	0	0	0	0	?	?	Healthcare inequalities; Indices of Multiple Deprivation; Crime; Recreation and amenity
6. Cultural heritage: Protect, enhance and manage sites, features and areas of archaeological, historical and cultural heritage importance	?	0	0	0	0	?	0	0/-	0	?	0	?	0	Designated and non-designated sites and areas; Setting of cultural heritage assets; Historic landscape character assessment; Archaeological assets.
7. Housing: Provide sufficient affordable, environmentally sound and good quality housing for the local population	+	+	+	+	+	+	+	+	0	+	+	-	-	Housing need : numbers, types, tenures House prices and affordability; Housing quality Homelessness.
8. Landscape: Protect, enhance and manage the character and appearance of the landscape and	?	?	?	?	?	?/ -	?	?	?	?	?	?	?	Landscape designations; Visual amenity; Landscape/townscape character;

SA objective	Spatial Options												Summary note or comment	
	A: Expand the centre of Slough	B: Expand Langley centre	C: New residential neighbourhood west of the Uxbridge Road	D: Regeneration of three selected areas	E: Estate Renewal	F: Intensification of the suburb	G: Redevelop Existing Business Areas for housing	H: Release Green Belt for housing	I: Release Green Belt for employment	J:1 Area of search South Bucks	J2: Area of search Windsor and Maidenhead	K: build in other areas		Do nothing (eg housing, open space, employment)
townscape, maintaining and strengthening distinctiveness and its special qualities.														
9. Use of resources: Promote the efficient use of land to support housing and employment and population growth	? / +	? / +	?/+	?/+	?/ +	?/ +	?/ +	?/ -	?/-	? /-	?/ -	?	-	Renewable energy; Minerals; Previously developed land.
10. Pollution: Reduce air, Noise, soil and water pollution.	-	?	+/?	?	?	?	?	?	?	?	?	?	?	Air pollution sources; Air quality management. Water quality; Contaminated land

9.3 In summary, there was generally good compatibility between the SA objectives and the Local Plan Spatial Options. However, the assessment highlighted some significant negative effects on SA Objective 4 (Economy) since the implementation of some of the Local Plan Spatial Options would involve the loss of existing employment areas. Significant adverse impacts were identified on Objective 13 (Pollution) as a result of the expansion of the centre of and possible significant adverse effects were identified for SA Objective 10 (Climate change).

9.4 The most significant conclusion from the

consultation on the Issues and Options Document was that there are no reasonable spatial option, or combination of options that would allow Slough to meet all of its identified housing and employment land needs within its boundaries.

9.5 As explained above an “Alternative a” was developed which involved meeting housing needs within the Borough through a combination of increasing the quantum of housing development in the town centre, intensifying the suburbs and redeveloping Existing Business Areas for housing.

- 9.6 The Sustainability Appraisal concluded that the combination of the options in Alternative (a), which is to increase the quantum of development within the Borough, would have significant adverse impacts on the SA Objectives.
- 9.7 It was also concluded that this alternative would have a negative effect upon the Local Plan Objectives as a whole. As a result it was decided not to carry Alternative (a) forward.
- 9.8 The Sustainability Appraisal process also requires a ‘do nothing’ approach to be considered as one of the alternatives. The “do nothing” approach was not considered reasonable because of the Council’s aspirations to deliver the Slough 2040 Vision and the statutory requirements for Local Plans.

Emerging Spatial Strategy

- 9.9 The “Emerging” Spatial Strategy”, which was produced in 2018 effectively consisted of “Alternative c”. This planned for a shortfall of housing in the Borough but promoted Spatial Options A; B; C; D; E; H; I; and J1 which were combined into the following five elements. for the “emerging” Plan:
- **Delivering** major comprehensive redevelopment within the “Centre of Slough”;
 - **Selecting** other key locations for appropriate development;
 - **Protecting** the built and natural environment of Slough including the suburbs;
 - **Accommodating** the proposed third runway at Heathrow and mitigating the impact;
 - **Promoting** the northern expansion of Slough in the form of a “Garden Suburb”;

- 9.10 The SA Framework was then used to test

the possible significant negative and positive effects of the five elements of the “emerging” Preferred Spatial Strategy against the Sustainability Objectives. The results of this can be seen in Table xx in the Appendix.

- 9.11 The overall conclusions were that the “emerging Preferred Spatial Strategy” would result in a shortage of housing but there were no better Spatial Options or combination of options such as increasing the quantum of housing development in the town centre, intensifying the suburbs or redeveloping Existing Business Areas for housing.

Proposed Spatial Strategy (2020)

- 9.12 The *Proposed Spatial Strategy (2020)* which is “Alternative d” made a number of changes to the previous one. The main difference was that it was no longer involved accommodating the proposed third runway because it became clear that the expansion of Heathrow airport was not likely to go ahead in the short to medium term.
- 9.13 As a result the new Proposed Spatial Strategy had the following five key components:
- **Delivering** major comprehensive redevelopment within the “Centre of Slough”;
 - **Selecting** other key locations for appropriate *sustainable* development;
 - **Enhancing** our distinct suburbs, vibrant neighbourhood centres and environmental assets;
 - **Protecting** the “Strategic Gap” between Slough and Greater London;

- *Promoting the cross border expansion of Slough to meet unmet housing needs.*

9.14 The main outcome of the Proposed Spatial Strategy (Alternative d) is that nearly all of the growth will take place in the centre of Slough. The suburban areas would be protected and there would be no

loss of public open space.

9.15 The five components which made up the proposed Spatial Strategy (Alternative d) were tested against the SA framework to see whether there are possible significant positive effects. The results of this are set out in Table 5 below.

Table 5 the 5 components of the proposed spatial strategy against the SA objectives

SA objective	Spatial Strategy					Key issues
	<i>Delivering major comprehensive redevelopment within the "Centre of Slough";</i>	<i>Selecting other key locations for appropriate sustainable development</i>	<i>Enhancing our distinct Suburbs , vibrant neighbourhood centres and environmental assets;</i>	<i>Protecting the "Strategic Gap" between Slough and Greater London;</i>	<i>Promoting the cross border expansion of Slough to meet unmet housing needs.</i>	
1. Transport and accessibility: Improve the efficiency of transport networks by increasing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel.	+/-	?	+	?	?/-	Transportation infrastructure; Traffic flows; Walking and cycling; Accessibility.
2. Biodiversity and geodiversity: Protect, enhance and manage biodiversity and geodiversity.	0	-	+	?/+	?	Habitats; Species; Nature conservation designations;
3. Climate change: Minimise the borough's contribution to climate change, and consider methods to adapt to climate change.	?	?	?	?/+	?	Climate change adaptation; Flooding.

SA objective	Spatial Strategy					Key issues
	<i>Delivering</i> major comprehensive redevelopment within the “Centre of Slough”;	<i>Selecting</i> other key locations for appropriate sustainable development	<i>Enhancing</i> our distinct Suburbs , vibrant neighbourhood centres and environmental assets;	<i>Protecting</i> the “Strategic Gap” between Slough and Greater London;	<i>Promoting</i> the cross border expansion of Slough to meet unmet housing needs.	
4. Economy: Develop a dynamic, diverse and resilient economy that excels in innovation with higher value, lower impact activities.	+	-	?	-	0	Economic Development Need Economic performance; Sites and premises.
5. Health: Safeguard and improve community health, safety and well-being.	0/+	?	+	0	0	Healthcare inequalities; Indices of Multiple Deprivation; Crime; Recreation and amenity
6. Cultural heritage: Protect, enhance and manage sites, features and areas of archaeological, historical and cultural heritage importance	?/-	-	+	+	?/-	Designated and non-designated sites and areas; Setting of cultural heritage assets; Historic landscape character assessment; Archaeological assets.
7. Housing: Provide sufficient affordable, environmentally sound and good quality housing for the local population	+	+	-	-	+	Housing need : numbers, types, tenures House prices and affordability; Housing quality Homelessness.
8. Landscape: Protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening distinctiveness and its special qualities.	?/-	-	+	+	?/-	Landscape designations; Visual amenity; Landscape/townscape character;

SA objective	Spatial Strategy					Key issues
	<i>Delivering</i> major comprehensive redevelopment within the “Centre of Slough”;	<i>Selecting</i> other key locations for appropriate sustainable development	<i>Enhancing</i> our distinct Suburbs , vibrant neighbourhood centres and environmental assets;	<i>Protecting</i> the “Strategic Gap” between Slough and Greater London;	<i>Promoting</i> the cross border expansion of Slough to meet unmet housing needs.	
9. Use of resources: Promote the efficient use of land to support housing and employment and population growth	+	?/-	?/-	0	?/-	Renewable energy; Minerals; Previously developed land.
10. Pollution: Reduce air, Noise, soil and water pollution.	-	?	+	0	?	Air pollution sources; Air quality management. Water quality; Contaminated land

9.16 This is particularly relevant to this Sustainability Appraisal of the Proposed Release of Green Belt Sites for Family Housing as explained below. As a result the main conclusions from the assessment of each of the 5 components of the proposed Spatial Strategy are set out below.

Delivering major comprehensive redevelopment within the “Centre of Slough”

9.17 The scale of new house building proposed in the centre means that this element of the proposed Spatial Strategy scores positively for SA objective 7 (housing). The scale of new offices proposed means that it also scores positively for SA Objective 4 (economy). Intensively redeveloping brownfield sites means that it scores well for SA Objective

9 (use of resources).

9.18 There could be a significant adverse impact on the SA objective 8 (townscape) due to concentration of many tall buildings and sites being developed within a compact area. It could have significant positive or adverse impacts on SA objective 1 (transport). Locating major development in the most accessible locations will reduce the need to travel and encourage sustainable modes of travel. However the scale of development could cause significant increase in traffic ,congestion and air pollution due to the increased trip generation from new residential, offices, retail and leisure uses. This could have a negative impact upon SA Objective 10 (pollution).

Selecting other key locations for appropriate sustainable development

- 9.19 This component of the proposed Spatial Strategy includes a combination of very different Spatial Options. On the one hand it proposes the redevelopment of exiting brownfield sites on the other hand it proposes the development of greenfield Green Belt sites for housing. As a result it is difficult to assess this component as a whole against the SA Objectives.
- 9.20 It is no longer proposed to develop the centre of Langley for residential but the proposed housing in Cippenham, Chalvey and on Green Belt land on the edge of Slough means that the component scores positively against SA Objective 7 (housing).
- 9.21 The proposed housing on greenfield Green Belt sites is in conflict with SA objective 8 (landscape), SA Objective 2 (biodiversity) and SA Objective 6 (cultural Heritage). This could also conflict with SA Objective 9 (use of resources)
- 9.22 Although this component of the proposed Spatial Strategy promotes the regeneration of existing business areas, it has not been possible to identify any new land for employment and there will be some loss. As a result it scores negatively against SA Objective 4 (economy).

Enhancing our distinct suburbs, vibrant neighbourhood centres and environmental assets

- 9.23 Preventing major development in the less accessible parts of the Borough and encouraging residents to use local facilities means that the enhancing the suburbs component of the proposed Spatial Strategy scores positively against SA objective 1 (transport). It will also score positively against SA Objective 8

(landscape) because it will prevent the loss of trees and green areas. Protection of the built and natural environment also scores positively against a range of objectives including SA Objective 2 (biodiversity) and SA Objective 6 (cultural heritage). Preventing development scores negatively against SA Objective 7 (housing).

Protecting the “Strategic Gap” between Slough and Greater London

- 9.24 There has been significant change with this component compared to the “emerging” Spatial Strategy because the expansion of Heathrow airport is no longer going ahead. As a result there is no longer a need to accommodate the proposed third run away and mitigating the impact. This means that the proposed Spatial Strategy can now continue to protecting the Strategic Gap, Green Belt and Colne Valley Park. This means there are no longer any significant negative environmental impacts. Heathrow expansion would have provided direct and indirect employment opportunities and would help to meet Slough need for 15,000 jobs. As a result the fact that the third runway is not going ahead and it is no longer proposed to have any airport related development in the area means that there will no longer be a significant beneficial impact on the economy.
- 9.25 Protecting the Colnbrook and Poyle area from development because of its importance in providing a Strategy Gap between Slough and London, protecting the Green Belt and contributing to the Colne Valley Park is essentially a “do nothing” option. It has a positive impacts in protecting cultural heritage (SA Objective 6) and protecting the landscape (SA Objective 8). It could have a positive impact upon SA Objective 2 (biodiversity)

and SA Objective 3 (climate change).

9.26 Preventing development means that it scores negatively against SA Objective 4 (economy) and SA Objective 7 (housing).

9.27 The overall conclusion of the *Sustainability Appraisal of the Proposed Spatial Strategy* is set out in paragraph 17.22 which states:

“As a result it is considered that the approach taken in the proposed Spatial Strategy is the most sustainable option. It clearly supports sustainable development through establishing objectives and elements that set out how the needs of the residential and business communities in the Borough can be mediated against the need to support future employment, social, housing and environment needs. The revision of the approach in response to the pause on expansion at Heathrow is also supported. Notably the continued protection of the Green Belt, and Slough’s unique Strategic Gap, but also to protect the suburbs and the existing business the current communities living and working across the Borough to accommodate development at a scale and rate that gives the best opportunity for sustainable communities, and thus reduce knock on impacts on crime or fear of crime for example. Policies and proposals will, however, have to be developed to mitigate some of the identified negative impacts.”

9.28 The Sustainability Appraisal also concluded that the overall shortfall of around 5,000 dwellings in the Plan area meant that the Proposed Spatial Strategy will have a significant negative impact upon SA Objective 7 (Housing)

9.29 It also noted that:

A further detailed Sustainability Appraisal

will have to be carried out of the Local Plan for Slough and any site allocations contained within it.

Proposed Release of Green Belt Sites for Family Housing

9.30 The *Proposed Release of Green Belt Sites for Family Housing* (November 2021), which is the subject of this Sustainability Appraisal, is a continuation and more detailed development of the *Proposed Spatial Strategy*. As a result, although it represents “Alternative e”, it only differs from the previous “Alternative d” in a limited way.

9.31 It takes the same Green Belt sites that were identified in both the *Issues and Options* and *Proposed Spatial Strategy* documents and gives them an initial high level “traffic light” assessment to indicate whether they are considered “suitable”, “possible” or “unsuitable” for housing development. The results of this are shown below.

“GREEN” Suitable

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

“AMBER” Possible

- Land east of Market Lane
- Land south of Blenheim Road

“RED” Unsuitable

- St Anthony’s Field, Farnham Road
- North of Muddy Lane, Stoke Poges Lane
- Bloom Park, Middle Green Road

- 9.32 It also assumes that all other Green Belt sites within Slough are unsuitable for housing development for the reasons set out in the report.
- 9.33 For the purposes of this Sustainability Appraisal it is therefore assumed that, unlike the Proposed Spatial Strategy, around 1,000 houses will actually be delivered as a result of the release of Green Belt land and so forms “Alternative e”, The extent to which this changes the conclusions of previous Sustainability Appraisals is considered below.
- 9.34 The possibility of building housing in Slough’s Green Belt has been considered and assessed at various stages of the Local Plan process and the results of this remain relevant to the current Sustainability Appraisal.
- 9.35 Option H in the *Issues and Options* document (2017) consisted of “The Release land from the Green Belt for housing (edge of Slough)”. The same ten sites that are currently being consulted on in the *Proposed Release of Green Belt Sites for Housing* (2020) were identified and consulted upon. As a result the *Sustainability Appraisal of the Issues and Options* (2017) assessed this option. The result, as shown in Table 4 above was that this Spatial Option H scored positively against the Sustainability Appraisal Objective for housing which is to “Provide sufficient affordable, environmentally sound and good quality housing for the local population”. There were positive and negative impacts upon the Sustainability Appraisal Objectives for Climate Change and the Use of Resources and a possible negative impact upon Cultural Heritage. There was either a neutral or unknown impact upon the other Sustainability Appraisal Objectives.
- 9.36 This meant that overall the Spatial Option of “Releasing land from the Green Belt for housing” had a negative impact upon more Sustainability Appraisal Objectives than it had positive.
- 9.37 The possibility of having Greenfield/Green Belt releases for housing was included in the *Proposed Spatial Strategy* (2020) as part of the “Selecting other key locations for appropriate sustainability” element of the strategy. It included the ten Green Belt sites that have been identified as having potential for housing development so that they could be the subject of initial public. It was recognized that sufficient work had not been carried out and that further consultation would have to take place before a proposal could be made to release any sites for housing. The document noted that amongst other things the sites would have to be assessed against the impact upon the intrinsic quality of the sites such as landscape character, ecological value, historic importance and agricultural land quality. It would also be necessary to assess the accessibility and sustainability of the proposed development and any benefits that it could provide in addition to meeting housing needs.
- 9.38 As a result the possibility of releasing sites from the Green Belt for housing was factored into the or the “Selecting other key locations for appropriate sustainability” element of the strategy which was assessed in the *“Sustainability Appraisal of the Proposed Spatial Strategy”*.(2020). The overall result of this assessment can be seen in Table 5 above.
- 9.39 The current consultation document on the release of Green Belt sites has carried out a preliminary “traffic light” assessment to indicate whether each of the sites may be suitable for housing development. No conclusions can be drawn from this at this stage and no decision has been made

about whether any of the sites will be allocated in the Local Plan. Nevertheless, in order to assess the best/worst case scenario, for the purposes of this Sustainability Appraisal it can be assumed that all ten sites will be developed.

- 9.40 As a result the main exercise that this Sustainability Appraisal has to do is reassess the conclusions of the *Sustainability Appraisal of the Proposed Spatial Strategy* taking account of the fact that the development of the ten Green Belt sites has moved from being a “possibility” to a “probability”..
- 9.41 In order to do this it is firstly necessary to consider the extent to which the actual development of around 1,000 houses in the identified locations would affect the key components of the Spatial Strategy and potentially alter the assessment made of them in Table 5 above.
- 9.42 None of the sites are in the centre of Slough and so there would be no change to the key components of “delivering comprehensive redevelopment within the centre of Slough”. It should be noted that this is where the bulk of the housing and other development is proposed to go and the area that is likely to be subject to the greatest change. As a result the effects of this component should be given the greatest weight in any Sustainability Appraisal.
- 9.43 None of the sites are within the existing housing areas. Two of the sites at Bloom Park and Muddy Lane would result in the loss of public/private open space and a third at south of Blenheim Road would result in development within an Historic Park and Garden. All of this constitute “environmental assets” As a result their development would effect the component of “*Enhancing our distinct suburbs, vibrant neighbourhood centres and environmental assets*”
- 9.44 The site East of Market Lane is within the Colne Valley Park and the Strategic Gap. As a result, although this may not be as sensitive as the Colnbrook and Poyle area it would effect the component of “*Protecting the Strategic Gap between Slough and Greater London*”.
- 9.45 The development of around 1,000 houses would reduce the shortfall of around 5,000 houses that is currently predicted in the Local Plan. As a result this would reduce the number of houses that might have to be built elsewhere as part of the component that involves *Promoting the cross border expansion of Slough to meet unmet housing needs*.
- 9.46 It is, however, technical difficult to take this into account in the Sustainability Appraisal of the Slough Local Plan and it needs to be recognised that wherever the housing goes it is likely to be on greenfield/Green Belt land.
- 9.47 Nevertheless the overall conclusion that can be drawn is that the proposed development of 1,000 dwellings would not have a significant upon four of the five key components of the *Proposed Spatial Strategy*. This means that the evaluations of these against the Sustainability Objectives, as set out in Table 5 above, remain the same.
- 9.48 The main task for this Sustainability Appraisal is therefore to assess the extent to which building 1,000 houses on Green Belt sites changes the fifth element of the Spatial Strategy and the evaluation of it.
- 9.49 As explained above, the possible development of greenfield/green belt land formed part of the “*selecting other key locations for appropriate sustainable development*” component of the Spatial Strategy and so was assessed as part of

this.

- 9.50 It is important to note that this element of the Proposed Spatial Strategy identified a number of key locations where appropriate development could take place. This included redevelopment upon Slough Trading Estate, redeveloping the “Cippenham Central” area, developing housing sites as part of the Chalvey Regeneration and enhancing the District Shopping Centres. As a result the possible release of Green Belt had to be assessed within the context of all of these. All of the others involved redevelopment of brownfield sites, the possible release of Green Belt would be the only green field development. This was given some significance in the Sustainability Appraisal.
- 9.51 Table 5 above shows that the “Selecting other key locations for appropriate sustainability” element, which included the possible release of Green Belt sites for housing, only scored positively against the Sustainability Appraisal Objective for housing which is to “Provide sufficient affordable, environmentally sound and good quality housing for the local population”.
- 9.52 There was a predicted negative impact upon the Sustainability Objectives for biodiversity, the economy, cultural heritage and landscape. The impacts upon the other Objectives were uncertain, or, in the case of the use of resources, potentially negative.
- 9.53 It is important to understand how the possible release of Green Belt land contributed to this scoring. *The Sustainability Appraisal of the Proposed Spatial Strategy* specifically states that:
- “The proposed housing on greenfield Green Belt sites is in conflict with SA objective 8 (landscape), SA Objective 2*

(biodiversity) and SA Objective 6 (cultural Heritage). This could also conflict with SA Objective 9 (use of resources)”

- 9.54 As a result it can be seen that the possibility of releasing Green Belt sites for housing has already had a negative effect upon the assessment of the “Selecting Key Locations” component of the Proposed Spatial Strategy.
- 9.55 Nevertheless the overall conclusion of the Sustainability Appraisal was that the proposed strategy was the most sustainable option.
- 9.56 One of the reasons for this was the weight given to the need for housing. The Appraisal concluded that:
- “The proposed Spatial Strategy will be around 5,000 houses short of meeting the SA Objective 7 which is to “Provide sufficient affordable, environmentally sound and good quality housing for the local population”. This is a significant impact which should be addressed if possible.”*
- 9.57 The delivery of an additional 1,000 dwellings through the *Release of Green Belt Sites for Family houses* would help to address this key issue identified in the previous Sustainability Appraisal and help to meet SA Objective 7.
- 9.58 It would also increase the previously identified significant adverse impacts upon SA Objective 8 (landscape), SA Objective 2 (biodiversity) and SA Objective 6 (cultural heritage).
- 9.59 It is not, however, considered that this changes the assessment in Table 5 above which can be used in this Sustainability Appraisal.
- 9.60 As a result the overall conclusion to be drawn from predicting and evaluating the effects of the Proposed Release of Green

Belt Sites for Family Housing, using the Sustainability Appraisal Objectives, is that it remains part of the most sustainable spatial option.

- 9.61 The previous Sustainability Appraisal recommended that policies and proposals will have to be developed to mitigate some of the identified negative impacts. No policies or proposals have been included in the Proposed Release of Green Belt Sites for Family Housing.
- 9.62 Mitigation measures will have to be provided to help to reduce the impact of development of 1,000 houses upon the identified environmental objectives. One mitigation measure could be not building houses upon some of the possible ten sites where there is the highest adverse impact.
- 9.63 Decisions about this will have to be made in the later stages of the preparation of the Local Plan and these will be the subject of a further detailed Sustainability Appraisal.

10 Cumulative impact of the Proposed Release of Green Belt Sites for Family Housing

- 10.1 As explained above this appraisal relies upon the methodology and findings of the *Sustainability Appraisal of the Proposed Spatial Strategy (2020)*. This assessed the cumulative impact of all the components within the Proposed Spatial Strategy the SA objectives. In doing so the greatest weight was given to the impacts of “delivering major comprehensive development in the centre of Slough” because this is where the majority of the proposed development will take place.
- 10.2 It should be noted that the proposal to “promote the cross border expansion of Slough to meet Slough’s unmet housing needs” is technically outside of the scope of this Sustainability Appraisal and so cannot be included in the cumulative impact.
- 10.3 The proposal to build up to 1,000 family houses on Green Belt sites would alter the balance of the Proposed Spatial Strategy slightly but this would only represent around 10% of the total housing development and would be significantly less than the 9,000 houses that are proposed to be built in the centre of Slough. It could also reduce the number of houses that could be needed in the proposed “cross border expansion of Slough” but this could still be around 5,000. It should be noted that no non-residential uses are being proposed in the Green Belt sites and so releasing these would not alter the balance of development in this respect.
- 10.4 The overall shortfall of at least 5,000 dwellings in the Plan area means that the Proposed Spatial Strategy will have a significant negative impact upon SA Objective 7 (Housing). The provision for major office development in the centre of Slough will have a significant positive impact upon SA 4 (Economy). This is, however, balanced by the lack of any new employment development in the rest of the Borough which could have a significant negative impact.
- 10.5 The proposed scale of housing and employment development in the Spatial Strategy still means that there could be a significant impact upon SA Objective 2 (biodiversity), SA Objective 6 (cultural heritage) and SA Objective 8 (landscape).
- 10.6 It is not considered that there are any other cumulative impacts from other plans or proposals that need to be considered in this Sustainability Appraisal.

11 Mitigating Adverse Effects and Maximising Beneficial Effects

- 11.1 The Sustainability Appraisal process includes the consideration of whether there need to be measures to mitigate any adverse effects. Detailed technical work has not yet been carried out on the sites and so it is not yet possible to fully assess what the adverse effects of the development would be.
- 11.2 At the same time neither the Proposed Spatial Strategy nor the current consultation document on the Proposed Release of Green Belt Sites for Family housing contain any policies. These will be developed as part of the next stage of the Local Plan. These will also take account of the various environmental, transport and other strategies that are being prepared by the Council. As a result mitigation for the adverse effects of developing Green Belt sites and for maximising the beneficial effects, will be developed at a later stage of the preparation of the Local Plan.
- 11.3 The extent and effectiveness of any proposed mitigation measures can also be assessed in more detail in the next stage of the Sustainability Appraisal.

12 Monitoring Significant Effects

- 12.1 Stage B6 of the Sustainability Appraisal process involves proposing measures to monitor the significant effects of implementing the Local Plan.
- 12.2 It is, however, too early to propose monitoring measures. When a full draft of the Plan is produced, part of this will include proposals for monitoring the policies and proposals. There will also be a final version of the Sustainability

Appraisal which will set out a framework for monitoring the significant effects of the plan.

13 Conclusion

- 13.1 The *Proposed Release of Green Belt Sites for Family Housing* (November 2021), which is the subject of this Sustainability Appraisal, is a continuation and more detailed development of the Proposed Spatial Strategy (2020).
- 13.2 It includes the same ten Green Belt sites that were identified in both the Issues and Options and Proposed Spatial Strategy documents as potential housing sites.
- 13.3 The main difference is that has moved from being a “possibility” to a “probability”. This means that for the purposes of this Appraisal it can be assumed that around 1,000 houses will actually be delivered in the identified locations.
- 13.4 As a result the main exercise that this Sustainability Appraisal has to do is reassess the conclusions of the Sustainability Appraisal of the Proposed Spatial Strategy taking this into account.
- 13.5 In doing so it uses the Sustainability Objectives that were developed in the *Scoping Report*. It also takes account of how this new “Alternative e” compares to the options and alternatives that were tested in previous Sustainability Appraisals.
- 13.6 This Sustainability Appraisal of the *Proposed Release of Green Belt Sites for Family Housing* relies upon the work that has been previously carried out during the development of the Local Plan for Slough.
- 13.7 The previous appraisal concluded that:
“The proposed Spatial Strategy will be around 5,000 houses short of meeting the

SA Objective 7 which is to “Provide sufficient affordable, environmentally sound and good quality housing for the local population”. This is a significant impact which should be addressed if possible.”

in the later stages of the preparation of the Local Plan and these will be the subject of a further detailed Sustainability Appraisal.

13.8 The delivery of an additional 1,000 dwellings through the Release of Green Belt Sites for Family houses would help to address the shortfall.

13.9 It would, also increase the previously identified significant adverse impacts upon SA Objective 8 (landscape), SA Objective 2 (biodiversity) and SA Objective 6 (cultural heritage).

13.10 It is not, however, considered that this changes the assessment in the Sustainability Appraisal of the Proposed Spatial Strategy which can be relied upon for this Sustainability Appraisal.

13.11 As a result the overall conclusion to be drawn from predicting and evaluating the effects of the Proposed Release of Green Belt Sites for Family Housing, using the Sustainability Appraisal Objectives, is that it remains part of the most sustainable spatial option.

13.12 The previous Sustainability Appraisal recommended that policies and proposals will have to be developed to mitigate some of the identified negative impacts. No policies or proposals have been included in the Proposed Release of Green Belt Sites for Family Housing.

13.13 Mitigation measures will have to be provided to help to reduce the impact of development of 1,000 houses upon the identified environmental objectives. One mitigation measure could be not building houses upon some of the possible ten sites where there is the highest adverse impact.

13.14 Decisions about this will have to be made

Appendix 1 – Sustainability Appraisal assessment tables

Table 6 Summary of the SA framework Objectives and Scoping Findings

SA Objective	Reference information	Sustainability issue	What is included in the sustainability theme?	
1	Transport and accessibility: Improve the efficiency of transport networks by increasing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel.	Chapter 3 - Accessibility and transportation (SEA – Population) Key issues box 3.1	Growing road traffic, congestion and dependence on private car use. Cultural and practical/perceived obstacles to walking and cycling, particularly for short journeys New rail connections – Western rail access to Heathrow Airport (WrltH) & Crossrail Finite capacity of junctions on road network Options for SMART technologies New road works delivering increased capacity	Transportation infrastructure; Traffic flows; Walking and cycling; Accessibility.
2	Biodiversity and geodiversity: Protect, enhance and manage biodiversity and geodiversity.	Biodiversity and geodiversity. (SEA - Biodiversity, Flora, fauna) Chapter 5 Key issues box 5.1	Declining quality and quantity of ecological sites important for local and regional biodiversity, and their connectivity. Legal duties to protect, enhance and manage biodiversity and geodiversity	Habitats; Species; Nature conservation designations; Landscape features; Geological features.
3	Climate change: Minimise the borough's contribution to climate change, and consider methods to adapt to climate change.	Climate change – adaptation and mitigation (SEA-Climatic factors) Chapter 6 Key issues box 6.1	Reducing contribution: Delivering energy efficiency Carbon Emissions - need to reduce Carbon emissions - compatible with the Council's carbon management plan Adapting to: Considering Heat Islands effect Flooding - localised, short term incidents from surface water; and fluvial flooding. -Consideration of the Councils Local Flood Risk Management Strategy.	Greenhouse gas emissions by source; Greenhouse gas emissions trends; Effects of climate change; Climate change adaptation; Flooding.
4	Economy: Develop a	Economic factors	Land use constraints to physical expansion to provide additional needs	Economic

	SA Objective	Reference information	Sustainability issue	What is included in the sustainability theme?
	dynamic, diverse and resilient economy that excels in innovation with higher value, lower impact activities.	(SEA- Material Assets) Chapter 7 Key issues box .1	for business and jobs for residential communities. Changes resulting from the pause to expansion plans for Heathrow. Role of the town centre, Langley and others. Viability of intensification on brown field land – e.g. contaminated land remediation/ demolition High levels of ‘footloose’ B8 identified in the EDNA Disparity between resident skills and incomes compared to local jobs available Shortage of education facilities	Development Need Economic performance; Business start-ups; Employment and earnings; Skills, education and unemployment; Sites and premises.
5	Health: Safeguard and improve community health, safety and well-being.	Health and wellbeing Climate Change (SEA – Human Health) Chapter 8 Key issues box 8.1	Poverty, deprivation, social exclusion, and overcrowding Shortage of open space in the Borough, Potential shortage of health facilities. Fast growing mixed ethnic population and overcrowding. Risk of flooding from all sources - see climate change Pollution – see below Need to protect and enhance the borough’s cultural heritage – both that that is nationally important but also locally important Need to ensure adequate parks and play spaces	Health indicators; Healthcare inequalities; Sport, fitness and activity levels. Indices of Multiple Deprivation; Crime; Recreation and amenity (including open space and green infrastructure).
6	Cultural heritage: Protect, enhance and manage sites, features and areas of archaeological, historical and cultural heritage importance.	Historic environment (SEA – Cultural heritage) Chapter 9 Key issues box 9.1	Need to protect and enhance the borough’s cultural heritage assets– both that that is nationally important but also locally important	Historic development of the town; Designated and non-designated sites and areas; Setting of cultural heritage assets; Historic landscape character assessment; Archaeological assets.
7	Housing: Provide sufficient affordable, environmentally	Housing (SEA – Population,	High housing need (OAHN) within the Housing Market Area. Land use constraints to physical	Housing need : numbers, types, tenures House prices and

SA Objective	Reference information	Sustainability issue	What is included in the sustainability theme?
	sound and good quality housing for the local population material assets) Chapter 10 Key issues box 10.1	expansion to provide additional housing and affordable housing Relative affordability of property in Slough within the Housing Market Area and London Quality of existing stock. High occupancy rates, driven by choice and need. Viability impacts on quality of new stock. Availability of high quality housing to meet the aspirations of Slough residents	affordability; Housing quality and vacancy rates; Homelessness. Population size and migration; Population density; Age structure;
8	Landscape: Protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening distinctiveness and its special qualities. Landscape and townscape Protect and enhance natural resources (SEA – Landscape) Chapter 11 Key issues box 11.1	Need to protect locally valued (but not nationally protected) landscapes and townscapes, including versus purposes of the Green Belt Structural change from the DCO proposals for expansion at Heathrow Impact on the Borough from densification Poverty, deprivation, social exclusion, and overcrowding Desire to avoid negative social, economic and environmental impacts of high density development :e.g. in unsuitable locations, without sufficient amenity or infrastructure	Landscape designations; Visual amenity; Landscape/townscape character; Tranquillity.
9	Efficient use of land to support housing and employment and population growth Material assets (SEA – Material assets, natural resources)	Capacity of utilities to meet demand for water, sewerage, electricity, waste disposal Waste hierarchy (reduce, reuse, recycle) and Reducing use of landfill Sterilised supply of minerals (sand and gravel) Quality of undeveloped land (Large areas of landfill, low demand and limited supply of versatile agricultural land).	Renewable energy; Waste arising and recycling rates; Minerals; Previously developed land.
10	Pollution: Reduce air, noise soil and water pollution. Water and Soil Climate change mitigation and adaptation (air quality)	Risk to quality of local watercourses from storm events. Impacts of contaminated land on development -see Material assets re water and	Air pollution sources; Air quality hotspots; Air quality management.

SA Objective	Reference information	Sustainability issue	What is included in the sustainability theme?
	Human Health (noise) (SEA – water, soil, air)	sewerage demand Poor air quality – spatial extent and quantum of exceedances (levels of NOx adding to base levels created by M4 and Heathrow related traffic) Noise pollution from transport and disturbance from higher density development	Soils; Watercourses; Water resources; Water quality; Contaminated land.

Table 7 Appraisal of the Local Plan Issues and Options Spatial Options

SA objective	Spatial Options												
	A: Expand the centre of Slough	B: Expand Langley centre	C: New residential neighbourhood west of the Uxbridge Road	D: Regeneration of three selected areas	E: Estate Renewal	F: Intensification of the suburb	G: Redevelop Existing Business Areas for housing	H: Release Green Belt for housing	I: Release Green Belt for employment	J:1 Area of search South Bucks	J:2 Area of search Windsor and Maidenhead	K: build in other areas	Do nothing (eg housing, open space, employment)
1. Transport and accessibility: Improve the efficiency of transport networks by increasing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel.	+	+	+	?	?	?	?	?	-	?	?	-	-
2. Biodiversity and geodiversity: Protect, enhance and manage biodiversity and geodiversity.	0	0	0	0	0	?	0	?	?	?	?	?	0
3. Climate change: Minimise the borough's contribution to climate change, and consider methods to adapt to climate change.	?	?	?	?/-	?	?	?	?/-	?/-	?/-	?/-	?	?

SA objective	Spatial Options												
	A: Expand the centre of Slough	B: Expand Langley centre	C: New residential neighbourhood west of the Uxbridge Road	D: Regeneration of three selected areas	E: Estate Renewal	F: Intensification of the suburb	G: Redevelop Existing Business Areas for housing	H: Release Green Belt for housing	I: Release Green Belt for employment	J:1 Area of search South Bucks	J2: Area of search Windsor and Maidenhead	K: build in other areas	Do nothing (eg housing, open space, employment)
4. Economy: Develop a dynamic, diverse and resilient economy that excels in innovation with higher value, lower impact activities.	+	-	-	?	0	0	-	0	+	0	0	0	-
5. Health: Safeguard and improve community health, safety and well-being.	0	0	0	0	0	0	0	0	0	0	0	?	?
6. Cultural heritage: Protect, enhance and manage sites, features and areas of archaeological, historical and cultural heritage importance	?	0	0	0	0	?	0	0/-	0	?/-	0	?	0
7. Housing: Provide sufficient affordable, environmentally sound and good quality housing for the local population	+	+	+	+	+	+	+	+	0	+	+	-	-
8. Landscape: Protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening distinctiveness and its special qualities.	?	?	?	?	?	?/-	?	?	?	?/-	?	?	?

SA objective	Spatial Options												
	A:Expand the centre of Slough	B: Expand Langley centre	C:New residential neighbourhood west of the Uxbridge Road	D:Regeneration of three selected areas	E:Estate Renewal	F:Intensification of the suburb	G:Redevelop Existing Business Areas for housing	H:Release Green Belt for housing	I:Release Green Belt for employment	J:1 Area of search South Bucks	J2:Area of search Windsor and Maidenhead	K: build in other areas	Do nothing (eg housing, open space, employment)
9. Use of resources: Promote the efficient use of land to support housing and employment and population growth	?/+	?/+	?/+	?/+	?/+	?/+	?/+	?/-	?/-	?/-	?/-	?	-
10. Pollution: Reduce air, Noise, soil and water pollution.	-	?	+/?	?	?	?	?	?	?	?	?	?	?

Table 8 Appraisal of the "emerging" Spatial Strategy :Alternative (c)

SA objective	Spatial Options								
	A:Expand the centre of Slough	B: Expand Langley centre	C:New residential neighbourhood west of the Uxbridge Road	D:Regeneration of three selected areas	E:Estate Renewal	H:Release Green Belt for housing	I:Release Green Belt for employment	J:1 Area of search South Bucks	K: build in other areas
Alternative c), which was Spatial Option J1 involves meeting housing needs adjoining the Borough in a northern expansion of Slough, and carrying forward all options except Spatial Options F, G and J2.									
1. Transport and accessibility: Improve the efficiency of transport networks by increasing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel.	+	+	+	?	?	?	-	?	-
2. Biodiversity and geodiversity: Protect, enhance and manage biodiversity and	0	0	0	0	0	?	?	?	?

SA objective	Spatial Options								
	A: Expand the centre of Slough	B: Expand Langley centre	C: New residential neighbourhood west of the Uxbridge Road	D: Regeneration of three selected areas	E: Estate Renewal	H: Release Green Belt for housing	I: Release Green Belt for employment	J:1 Area of search South Bucks	K: build in other areas
Alternative c), which was Spatial Option J1 involves meeting housing needs adjoining the Borough in a northern expansion of Slough, and carrying forward all options except Spatial Options F, G and J2.									
geodiversity.									
3. Climate change: Minimise the borough's contribution to climate change, and consider methods to adapt to climate change.	?	?	?	?/-	?	?/-	?/-	?/-	?
4. Economy: Develop a dynamic, diverse and resilient economy that excels in innovation with higher value, lower impact activities.	+	-	-	?	0	0	+	0	0
5. Health: Safeguard and improve community health, safety and well-being.	0	0	0	0	0	0	0	0	?
6. Cultural heritage: Protect, enhance and manage sites, features and areas of archaeological, historical and cultural heritage importance	?	0	0	0	0	0/-	0	?/-	?
7. Housing: Provide sufficient affordable, environmentally sound and good quality housing for the local population	+	+	+	+	+	+	0	+	-
8. Landscape: Protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening distinctiveness and its special qualities.	?	?	?	?	?	?	?	?/-	?
9. Use of resources: Promote the efficient use of land to support housing and employment and population growth	?/+	?/+	?/+	?/+	?/+	?/-	?/-	?/-	?
10. Pollution: Reduce air, Noise, soil and water pollution.	-	?	+/?	?	?	?	?	?	?

Sustainability Appraisal of the Proposed Release of Green Belt Sites for Family Housing (November 2021)