

The Proposed Release of Green Belt Site for Family Housing

Appendix A – Consultation Questions

To complete the questions online, please visit www.slough.citizenspace.com. Responses must be submitted by 11:59 pm on 17th December 2021. The questions are also available in Word and PDF documents, and can be accessed from the following link:

www.slough.gov.uk/planning-policy We will publish all responses we receive on our website. Those not using the online form should submit representations:

via email to: SpatialStrategy@slough.gov.uk

via post to: Planning Policy, Slough Borough Council, Observatory House, 25 Windsor Rd, Slough SL1 2EL.

About You

1. What is your name? Stewart Pomeroy

2. What is your email address?

Stewart.pomeroy@groundwork.org.uk

3. What is your postcode? UB9 5PG

4. If you are participating on behalf of an organisation, what is the name of the organisation?

Colne Valley Regional Park

5. By completing this survey, you are consenting to participate in this study and grant permission for the data generated from this consultation to be used in the Council's publications on this topic.

Agree

6. Do you agree there is a need for more family housing in Slough?

Yes

No

Please explain your answer if you wish

We question the level of need as government policy/ prescription on housing numbers is under fundamental review

7. Do you think there is a need for more affordable family housing in Slough?

Yes

No

Please explain your answer if you wish:

8. Do you think this housing need justifies building on some sites in the Green Belt in Slough?

Yes

No

Please explain your answer if you wish:

We recognise the pressures Slough faces – a tight boundary and a desire from the Council to accommodate development pressures. However, for the good of the community and wider environment, our response highlights that the context for those development pressures/ land supply

has changed and that the protection and improvement of the Colne Valley Regional Park, a key part of the metropolitan Green Belt, requires far greater attention and weight.

As defined in Para 145 of the NPPF the Council has a duty to ‘plan positively to enhance their (green belts) beneficial use’. This paragraph then goes on to outline some of the opportunities for beneficial use including access, outdoor sport and recreation, retain and enhance landscapes, visual amenity and biodiversity. These opportunities correlate strongly with the objectives of the Colne Valley Regional Park and are the heart of what the green belt was designated for and the benefits this can provide for residents of Slough.

For the good of the local community and wider environment we believe it should be recognised that Slough does not have an infinite capacity to grow, and the context behind this consultation should be recast accordingly.

9. Have you any alternative solutions for providing family housing? *Choose from the following:*

	Yes	No
a) Build family homes in Slough’s urban area at a high density	X	
b) Build family housing outside the Borough but close to Slough		X
c) Not provide for family housing within or near Slough (people may have to move away from the Slough area)		
d) any other option		

Please explain your answer if you wish:

Accommodate new homes in Slough’s urban area: In the ‘new normal’, post Covid-19 world, there could be dramatic changes for places like Slough and the pattern of its commercial centres. New studies are needed that factor this in as (to a greater extent than already assumed) existing offices and large shops will become redundant and offer scope for conversion/ redevelopment to new uses. This will enable additional residential development to be accommodated within the Borough through change of use and change the capacity for additional residential development.

10. Do you think the following are suitable sites for family housing?

	Yes	No
Site 1 - Wexham Park Hospital School of Nursing, Wexham Street		
Site 2 - Land to the rear of Opal Court Wexham Street		
Site 3 - Land east of Wexham Park Hospital		
Site 4 - Land east of Rochfords Gardens		
Site 5 - Upton Court Farm		
Site 6 - Land east of Market Lane		X
Site 7 - Land south of Blenheim Road		
Site 8 - St Anthony’s Field, Farnham Road		
Site 9 - North of Muddy Lane, Stoke Poges Lane		
Site 10 - Bloom Park (part of), Middlegreen Road		

Any comments

We object to Site 6 'Land east of Market Lane' because:

- The site is located within the Colne Valley Regional Park and the Strategic Gap
- The Horton Brook runs across the site and the northern part of the site is in Flood Zone 3. The northern and middle section of the site used for agriculture – making a contribution to the rural economy whilst also serving as Green Belt and delivering on the objectives of the Colne Valley Regional Park. The whole site is suitable for agricultural use.
- It will breach a clear urban edge that Market Lane represents. The site will have a massive impact on the perception of countryside for those driving or walking along Market Lane as it will turn it from an urban/rural edge road to an urban road. The views of the Buckinghamshire Green Belt from Market Lane and Parlaunt Road are wide-ranging and extensive looking over land used for agriculture. To use the strip that happens to be in Slough for housing would ruin this.
- This does not create a revised clearly defensible Green Belt boundary "using physical features that are readily recognisable and likely to be permanent." (NPPF para 143f). The current Green Belt Boundary of Market Lane serves this purpose and should be retained as the Green Belt boundary. The council do not reference to NPPF para 143f in the consultation document although they do recognise that it "would represent a substantial extension of the built up area into the countryside".

Potentially allocating the Market Lane site should be seen as strongly negative in the SA to the Green Belt, Colne Valley Regional Park and seriously undermines the policy for a strategic gap (something that the document does recognise at para 9.44 in the SA). But the structure of the SA doesn't enable this to come to light.

11. Do you know of any other Green Belt sites in Slough that may be suitable for family housing?

If yes, please identify the site

12. If you have any other comments on the proposed Release of Green Belt Sites for Family Housing Consultation Document, please specify the section or paragraph number in your response.

Any further comments

We welcome the Council's decision to rule out sites within the majority of the Colne Valley Regional Park and Strategic Gap – in line with current Council policy– with the exception of the Market Lane site (see our comments on that site under section 10 above). We welcome that some recognition is given to the CVRP as a natural resource and its role as a buffer to London in the Green Belt. However, we call for more positive planning for the CVRP so it can better realise its potential as a green corridor and a natural resource for Slough, London and nearby communities. This will help the Council meet its duties to 'plan positively' for green belts to 'enhance their beneficial use' as described in para 145 of the NPPF.

Paras 9.2-9.7 (GB considerations) do not refer to the need for any revised Green Belt boundary "using physical features that are readily recognisable and likely to be permanent." (NPPF para 143f).

Para 9.4: states that the Council will do a full Green Belt assessment/ report at a later stage as part of establishing whether 'exceptional circumstances' exist. The Colne Valley Regional Park feels that the council should have done more in depth work on Green belt before reaching the point of Reg 18 consultation, The Council is going about the emerging plan in a piecemeal way and should ensure compliance with NPPF (including paras 143 and 145)

If any sites are to be taken forward in the local plan then the council should identify 'compensatory improvements' to other areas of green belt in line with NPPF para 142 – this is referred to in para 9.7 of the consultation document. Compensatory improvements for any sites in and near the Colne Valley Regional Park should be informed by, and contribute to the delivery of, the Colne & Crane Valleys Green Infrastructure Strategy.

It is premature for Slough Borough Council to build an emerging plan strategy without having done fuller underpinning work on the Green Belt. This suggests that Slough Borough Council is not giving full weight to the protection of the Green Belt (and consequently the Colne Valley Regional Park)

- In the light of this the following conclusions are wrong and/or misleading ;

9.60 of the SA (reiterated at 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"

9.24 in the SA "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."
