



# **Wider Area Growth Study**

## **Part 2:**

# **Potential Locations for Development**

Final September 2022

**For:**

**Royal Borough of Windsor and Maidenhead**  
**and**

**Slough Borough Council**

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# 1 Introduction

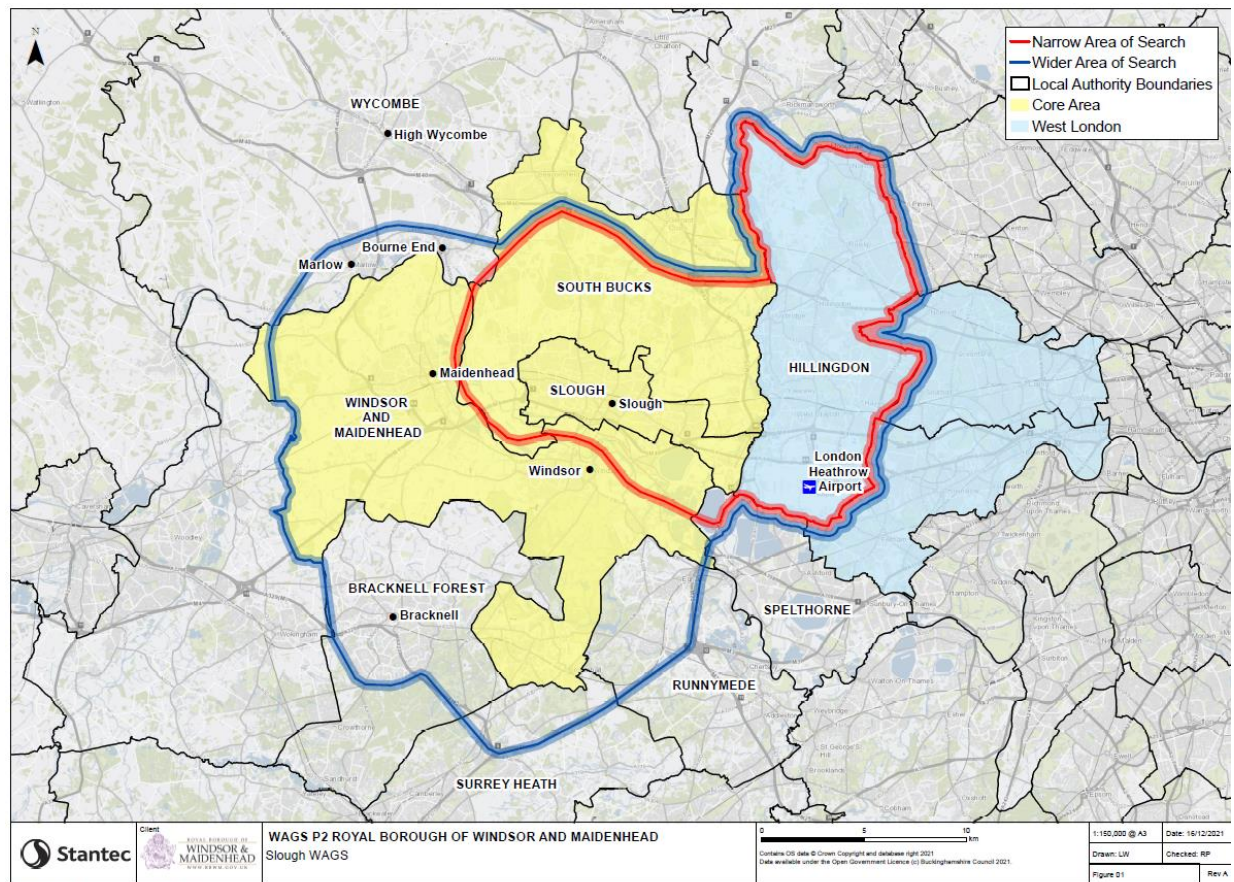
- 1.1 This document forms Part 2 of the Wider Area Growth Study (WAGS). It was commissioned jointly by the unitary authorities of the Royal Borough of Windsor and Maidenhead (RBWM) and Slough Borough. It is part of the evidence base supporting long-term planning for the area, including joint working between local planning authorities under the Duty to Co-operate.
- 1.2 The subject of WAGS is the future housing needs of the urban cluster formed by the urban areas of Slough, Maidenhead and Windsor, together with the southern part of the former South Bucks District. The area is experiencing strong growth pressures, so in the long term it may not be possible to meet all its development needs within the boundaries of its respective local authority areas. Supply may be especially constrained in Slough, which is built up to its administrative boundary. The purpose of WAGS is to identify sustainable spatial options for meeting those development needs, over and above the land already identified in current and emerging development plans.
- 1.3 WAGS was commissioned in two parts, both provided by the same consultancy firm (previously known as Peter Brett Associates or PBA, now Stantec).
- 1.4 WAGS Part 1, completed in 2019, was about the geography of housing need, and specifically the need of a 'core study area' comprising the boroughs of Slough and Windsor and Maidenhead (RBWM), plus the southern part of the former South Bucks and Chiltern districts. That housing need is the future demand for housing from people who would normally expect to live in the core area. The purpose of Part 1 was to define a wider *area of search* in which those people would be prepared to live, in the event they could not secure housing in the core places, due to lack of land.
- 1.5 WAGS Part 2, presented in this report, is about balancing need and supply. It first assesses how much land will be required to meet the development needs of the core area to 2039, over and above the supply already identified in emerging plans and their evidence bases. It then identifies and assesses potential development sites in the wider area of search that could fill that gap in supply. This search is for strategic sites, leaving out smaller-scale development opportunities.
- 1.6 It is important to note that the WAGS 2 study is expected to influence the future round of plan making and does not suggest policy. With the RBWM local plan now adopted this work help guide the next revision to this plan. In line with national policy and guidance the Council is required to review the plan every 5 years. In this work we have to make an assumption around the quantum of future development requirement in order to consider the scale of land that may be needed. But obviously any changes to national policy, and partially housing numbers, will be relevant to how this work is taken forward.

- 1.7 While the Part 1 study dealt entirely with housing, in Part 2 we also cover employment land uses, though in less detail than housing.
- 1.8 The Part 1 study was published in June 2019<sup>1</sup>. Based on the evidence of population profiles, migration and-travel-to-work geography, it recommended an area of search, or study area, comprising two elements, as mapped at Figure 1.1 below:
- The narrow area has the best chance of meeting the needs of Slough – which means the needs of people who would normally expect to live in Slough. It covers all of Slough borough, all of the London Borough of Hillingdon, and sections of RBWM and the former South Bucks district (now part of the Buckinghamshire unitary authority).
  - The wider area is likely to meet the needs of RBWM, and also some of the needs of Slough. In addition to the narrow area, it covers the rest of RBWM, some of Bracknell Forest district, a small part of the former Wycombe district (now subsumed into the Buckinghamshire unitary authority), and parts of Surrey Heath, Runnymede and Spelthorne districts in Surrey.
    - While the Part 1 study dealt entirely with housing, in Part 2 we also cover employment land uses, though in less detail than housing.
- 1.9 Finally; the reader needs to be aware that this work is considered evidence. The report does not represent the formal views of any Council and does not set policy. Many further stages of evidence will be required which may result in different conclusions and a different policy direction. National policy, including the scale of development needed in future rounds of development plan, can change. This study is driven by Governments long standing objective to boost the supply of housing, and we have looked to qualify a scale of 'need' but this is clearly in a state of flux.

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<sup>1</sup> Peter Brett Associates, Wider Area Growth Study, Part 1: Defining the Area of Search, June 2019..

**Figure 1.1 Area of search: indicative boundaries**



Source: WAGS Part 1, figure 7.1.

Note: local authority boundaries are mapped as they were in 2018, before the Buckinghamshire unitary authority was formed.

1.10 The whole approach of WAGS is based on a central principle of national planning policy: if a local authority cannot meet its development needs in full, neighbouring authorities should provide for the resulting unmet need, where it is practicable and sustainable to do so<sup>2</sup>. Accordingly, the study ignores administrative boundaries – so the study area produced by Part 1 extends beyond the core study area to neighbouring authorities; and Part 2 uses the same criteria to identify and assess sites in that core area and neighbouring authorities. In regard to the core area, Part 2 estimates whether each district has enough capacity to meet its future needs. In regard to all local authority areas, it estimates what capacity may be available to provide for any needs that the core area may be unable to meet.

1.11 The wider area of search drawn above is the study area for WAGS Part 2. Across the area, as required by the study brief, we have aimed to leave ‘no stone unturned’ in the search for potential development capacity. As part of this we

<sup>2</sup> See National Planning Policy Framework, paras 11, 26, 35. Since the part 1 study the paragraphs have since changed in wording, but the substance has not changed.

have considered the potential for releasing land from the Green Belt – which would need to be justified by exceptional circumstances.

- 1.12 Below, Chapter 2 assesses the balance of development needs and identified land supply in the core area, based on the development sites identified to date. Chapters 3 and 4 identify potential development capacity over and above that supply, considering brownfield and greenfield land in turn. Chapter 5 assesses the viability of development and its ability to contribute to infrastructure costs. Finally, Chapter 6 uses the above evidence to define a series of spatial options for closing the gap between the core area's need and its currently identified land supply.
- 1.13 The Part 2 study started in May 2020, but was paused for long periods in 2020 and 2021, at the client authorities' request – partly related to the pandemic but also the need to progress the RBWM local plan.
- 1.14 Therefore much of the evidence presented in this study was collected some time ago. For this draft we have updated the evidence as far as possible, but we cannot guarantee that all of it is up to date.



## 2 Development needs and planned land supply in the core area

### Introduction

- 2.1 In this section, we analyse the balance of development need and planned housing land supply in the core area to 2039. As stated earlier, that area comprise the boroughs of Slough and Windsor & Maidenhead and the southern section of the former South Bucks district (as also explained earlier, for the purpose of this report we treat South Bucks as a district). The analysis covers both housing and employment land – though on employment land much less information is available.
- 2.2 To put the analysis in context, it will be useful to summarise the progress of Local Plans covering the core area:
- Buckinghamshire Council (including the former South Bucks District) commenced its Regulation 18 stage for the preparation of the Local Plan for Buckinghamshire in November 2021 with a questionnaire Survey on future issues for planning. The timing of future stages will be influenced by the Government’s proposed planning reforms.
  - In RBWM, the Borough Local Plan, 2013-33 was submitted to the Secretary of State in 2018. Following examination hearings in two stages, the Council consulted on proposed Main Modifications in July-September 2021. The Inspector’s final report on the soundness and legal compliance of the plan was received on 26 January 2022 and the plan was adopted on 8 February 2022.
  - In Slough, the Council is working on a Local Plan review that will cover the period to 2036. As part of the review it published two documents for consultation: a Spatial Strategy in November 2020 and the proposed release of 10 Green Belt sites for family housing in November 2021. A revised LDS covering next stages of the Plan is in preparation.
  - The draft Chiltern and South Bucks Local Plan 2036 was withdrawn by the Council in October 2020, following Duty to Cooperate concerns covering issues relating to the problems addressed by this study. Going forward, the former South Bucks district will be covered by the new Buckinghamshire Local Plan, which is required to be adopted by April 2025 and will run to 2040. The Council expects to start the formal plan process only in 2022, because it is waiting for more detail and certainty about the national reforms proposed in the planning White Paper.
- 2.3 In the analysis below, data on planned land supply are taken from the emerging plans mentioned above and their supporting evidence bases.

## Housing

- 2.4 Housing needs and planned land supply are shown at Table 2.1 and Figure 1.1. As a measure of need we use the Local Housing Need (LHN) calculated by the government's standard method, as published by MHCLG in December 2020<sup>3</sup>. That standard-method figure is not necessarily the same as the housing need shown in Local Plans. For RBWM, for example, the standard-method housing need is 754 net new dwellings per annum (dpa); but the recently adopted Local Plan is based on a housing need of 712 dpa, measured by a different method, under national planning guidance that is now superseded. This study uses the latest standard method as a baseline however as the study looks at the long term future needs the affected authorities will need to a) update assumptions based on any revisions to the standard method, and b) in line with NPPG consider whether 'there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates' including from growth strategies.<sup>4</sup> Therefore the translation of the findings of the study into housing targets in future local plans will depend in part on the growth requirements within the study area including any DCO decision on the Heathrow Runway III and strategic infrastructure.
- 2.5 For southern South Bucks, MHCLG does not provide a number, because the standard method only works for whole districts. We have taken the area's housing need from the GL Hearn assessment<sup>5</sup>, which uses 60% of the South Bucks standard-method total, based on the fact that southern South Bucks accounted for 60% of both the district's population and its households. As the South Bucks figure is 431 dpa<sup>6</sup>, the resulting figure for southern South Bucks is  $431 * 0.6 = 258$  dpa.
- 2.6 With Buckinghamshire Council now replacing the former South Bucks and Chiltern Councils, the formal requirement for the South Bucks area no longer exists. Instead, the Buckinghamshire number is now the combined sum of the former constituent districts. But this does not change the GL Hearn analysis and its relevance to this work. This is because, for the County as whole, the Standard Method number is around 3,000 dpa. But the South Bucks share (or component) of that total remains almost identical to that developed by GL Hearn.
- 2.7 When calculated today the number for the South Bucks area is 429 dpa. So, it follows that their estimate of the 'share' remains at 258 dpa.
- 2.8 The WAGs work has always looked to locate housing close to where people would like to live, so for example, providing homes in locations where residents

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<sup>3</sup> MHCLG, *Indicative Local Housing Need (December 2020 Revised Methodology)*, December 2020. The figures are titled 'indicative', but this is due to uncertainty about capping based on existing plans, which does not apply to ur study area.

<sup>4</sup> Paragraph: 010 Reference ID: 2a-010-20201216

<sup>5</sup> GL Hearn for Councils, *Local Housing Needs Assessment, RBWM, Slough and South Bucks Local Authorities* (October 2019)

<sup>6</sup> The GL Hearn study and the MHCLG table show the same housing need figure for South Bucks, 431 dpa.

can get to work and be near their existing social and familial connections. Earlier work, and work to support the Buckinghamshire local plan have never suggested the County forms a housing market area and so, for our work it remains relevant consider the 258 dpa developed by GL Hearn. But we recognise that the 431 dpa number from which it is derived relates to South Bucks and this has in turn be subsumed into the overall 3,000 number for the County.

- 2.9 In relation to supply, the question is less straightforward, because data availability varies between areas. For each authority, we show the supply position at 2019 based on the latest available data, from emerging plans and their supporting evidence bases.
- 2.10 For RBWM, those latest data are in a note from the Council to the Inspector examining the draft Local Plan, dated July 2021<sup>7</sup>.

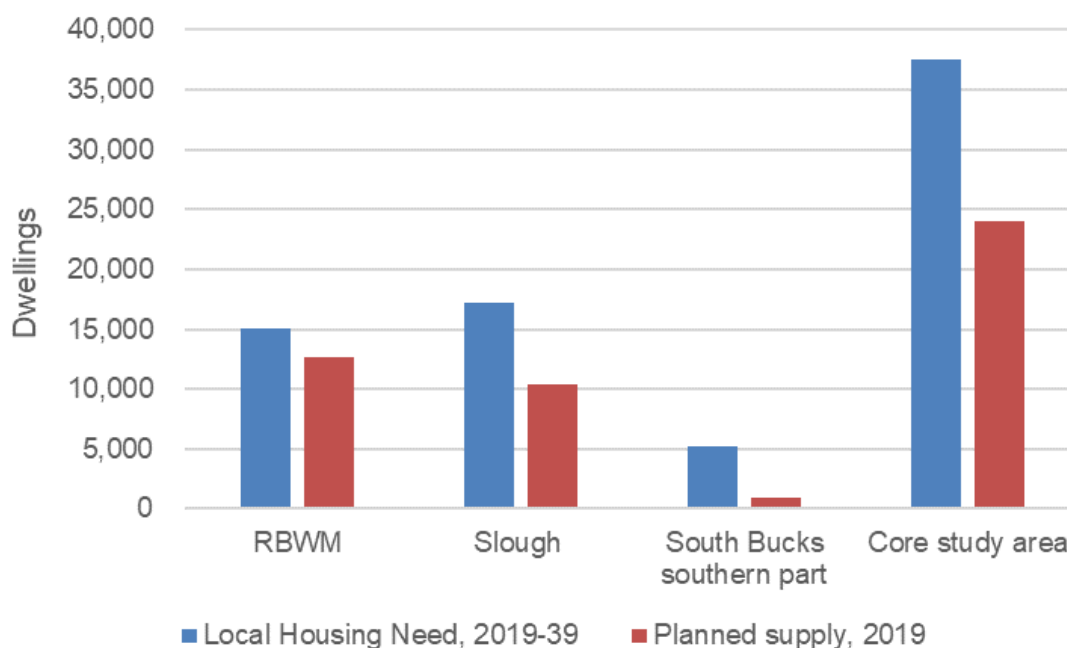
**Table 2.1 Housing need and identified supply, core area, 2019-39**

Net additional dwellings	RBWM	Slough	South Bucks southern part	Core districts
Local Housing Need, indicative, MHCLG December 2020				
Per annum	754	863	258	1,875
Total 2019-39	15,080	17,260	5,160	37,500
Planned supply, 2019	12,662	10,460	868	23,990
Surplus (deficit) = Supply less need	-2,418	-6,800	-4,292	-13,510

Source: Stantec.

Each area's Local Housing Need, as measured by the government's standard method, is a fixed annual number of homes that is based on a 10-year demographic projection, but continues indefinitely – so that it applies to any plan period. As Slough and Bucks local plans are now likely to run to 2040 one years supply (1,875 minus accepted windfall rates) may need to be added.

<sup>7</sup> RBWM Borough Local Plan examination, RBWM\_073b, *Update note on Inspector on stepped housing requirement, 19/07/2021*

**Figure 2.1 Housing need and identified supply, core area, 2019-39**


Source: Stantec

- 2.11 For Slough, the latest figures are in *the Proposed Spatial Strategy* published for consultation in November 2020. That document reports that from 2020 to the end of its plan period (2036) there is a need for 15,460 additional homes (para 9.2), against which the proposed supply shows a shortfall of 5,000 homes (para 9.3). The difference between these two figures, 10,460, is the planned housing supply at 2020. Figures in Table 2.1 reflect a slightly lower housing need figure released after the Spatial Strategy was published. It does not reflect extending the plan period to 2040.
- 2.12 For southern South Bucks, we have used the supply figure from the GL Hearn study mentioned earlier. As an alternative, our analysis might have considered the former South Bucks district as a whole. But there are no supply estimates at all for the district, because in its most recent draft plan housing need and supply are aggregated with Chiltern district<sup>8</sup>. That draft was withdrawn in 2020, as mentioned earlier.
- 2.13 In round numbers, across the core area over the period 2019-39, Local Housing Need totals 1,875 homes per year, hence 37,500 homes in total. The supply currently identified is 24,000 homes. The difference between these numbers is a supply shortfall, or gap, of 13,500 homes. Of this total shortfall, or unmet need, Slough accounts for the largest number, 6,800 homes. The figure for South Bucks is 4,300 homes, and for RBWM 2,400 homes. These figures estimate of

<sup>8</sup> In earlier versions of this analysis, we mentioned that Aylesbury Vale district had committed to provide up to 5,750 homes towards the needs of Chiltern and South Bucks. This commitment no longer holds, having been removed in the proposed Main Modifications to the emerging Vale of Aylesbury Local Plan.

the development land that should be provided in future plans, over and above the supply currently identified, to cover needs to 2039.

- 2.14 Now that the former South Bucks district is part of a larger local planning authority, Buckinghamshire Unitary Authority, if the former district cannot meet its own need that need should be met elsewhere in the county (the same planning authority). The supply shortfall for the rest of the core study area, covering Slough and RBWM, will be 9,200 homes, of which 6,800 (74%) relate to Slough. Although we note that homes in the north of Buckinghamshire are always unlikely to meet the genuine need for homes in the south because the part 1 study highlighted the social and physical links that connect the South of Bucks with Slough and the areas around (inc. Heathrow).
- 2.15 It may be helpful also to reflect on the long-term future, beyond our study period. Based on the current standard method, if additional land is found for 13,600 homes, supply and demand for the core study area will be in balance at 2039. But beyond that date yet more land will need to be found to meet the whole need – which according to the current standard method is 1,875 every year.

## Employment land

- 2.16 We have also tried to assess the balance of need and supply for employment land across the study area, again relying on the latest emerging plans and their supporting evidence. But we have not found a clear answer, as the documents provide much less information than for housing.

## Windsor and Maidenhead

- 2.17 Windsor and Maidenhead is the only authority that has made public a full quantitative assessment of need and supply of employment land. This is provided in the borough's submitted plan<sup>9</sup>, with further detail in a statement submitted to the plan examination<sup>10</sup>. Policy ED1 says

*'The Royal Borough will seek to make provision for at least 11,200 net new jobs across a range of floorspaces. It will do this by ensuring a flexible supply of high quality employment floorspace making some new allocations, utilising existing employment areas and promoting a more intensive use of these sites through the recycling, refurbishment and regeneration of existing older or vacant stock and promotion of flexible working practices.'*

- 2.18 For offices, the policy allocates three development / redevelopment sites and adds that when other town centre sites come forward for redevelopment they will be required to maximise the office component, in line with market evidence. It also states a *strong presumption* against loss of existing office space in town centres.

<sup>9</sup> Royal Borough of Windsor & Maidenhead, *Borough Local Plan 2013—33, Submission Version, incorporating proposed Changes October 2019, published for Consultation 1 November 2019*

<sup>10</sup> *Examination of the Royal Borough of Windsor and Maidenhead Borough Local Plan 2013-33, Matter 4: Economy / Employment, Statement by Royal Borough of Windsor and Maidenhead Council, August 2020*

- 2.19 For industrial development, the policy allocates two development sites, of which by far the largest is the Triangle Site in Maidenhead.
- 2.20 The Council's examination statement analyses the proposed supply in detail. For offices, it concludes that 'the Council is confident that, through new explicit allocations, the plan's policies, and future planning applications, the plan can meet the minimum identified needs for office space'. In relation to industry the demand-supply balance is harder to assess, mainly because the capacity of the Triangle Site has yet to be confirmed through flood modelling work at the planning application stage. The statement advises that '*if additional land is required in the medium term, this could be delivered via a review of the plan*'. It also notes that *despite many 'call[s] for sites, no alternative sites for industrial uses have been promoted to the Council as part of this plan round*'.

### South Bucks

- 2.21 No employment land data are available either for the former district of South Bucks or for its southern section. The only available information is from the former draft Chiltern and South Bucks Local Plan (July 2019), in which figures for the two former districts were merged. Based on a Housing and Employment Needs Study (HEDNA) produced in 2019, the plan indicated that for offices there was enough land to meet need; for core industrial (manufacturing) uses need would be negative, so that no additional land was required; but for warehousing (logistics) uses there was a shortfall. To help fill that gap, it proposed policies for intensification and spaceless growth. It added that the former district of Aylesbury Vale (now also merged into Buckinghamshire Council) had agreed to take a proportion of its unmet need, though this was not quantified.
- 2.22 The Chiltern and South Bucks draft plan was withdrawn by the Council in 2020, as mentioned earlier. It is to be replaced by the Buckinghamshire Local Plan, which has to be produced by 2025. The website of the new Buckinghamshire Council indicates that it is at the beginning of the plan-making process. Two calls for brownfield sites have been undertaken for the Local Plan for Buckinghamshire and the Regulation 18 stage 'Discovery and Exploration' engagement survey (November 2021 – February 2022). A further call for sites was launched on 13 June 2022.

### Slough

- 2.23 The latest emerging plan for Slough is the Proposed Spatial Strategy (November 2020) mentioned earlier. The section headed '*Wealth Creation and employment*' includes the following.
- '9.9 Because of current uncertainty It is not possible to quantify the number of jobs that are required to support the Slough economy but the plan continues to aim to provide an additional 15,000 jobs in order to meet the needs of the growing resident workforce. This should not be regarded as a maximum figure.*

9.10 There is a general demand for land for warehousing in the Slough and the surrounding area.'

- 2.24 Since Slough borough is largely built up to its administrative boundary, with no significant greenfield land. The planning system, and the Council, will continue to promote brownfield intensification but as regards a new strategy which requires more land it is likely that there is little or no supply to meet that need - unless it is proposed to build in the Colnbrook and Poyle Industrial area. The Green Belt (and Colne Valley Park) between Langley and London here is also critical in terms of its Green Belt purposes. This is recognised by its designation as 'Strategic Gap' between Slough and Greater London, as supported by the Secretary of State on Appeals as distinct and 'a higher bar' to Green Belt Policy.

### Summary

- 2.25 Across our core area, emerging plans and their supporting evidence bases do not provide a rigorous quantitative balance of need and supply for employment land. But, considered in the round, they do suggest that there is a significant supply shortfall in relation to industrial land (covering both core industrial uses and warehousing). Faced with poor or non-existent supply of development sites for industry, authorities are seeking to bridge the gap through intensification and 'spaceless growth'. How far these solutions are realistic and deliverable in practice, is an open question.

### Conclusion

- 2.26 For the core area as a whole in the study period 2019-39, our analysis shows that the land supply identified to date falls short of Local Housing Need by some 13,500 homes. Of this total, in round numbers RBWM accounts for 2,400 homes, Slough for 6,800 and Southern South Bucks for 4,300.
- 2.27 In relation to employment, over the study period the area appears to have a significant shortage of supply against need for industrial land (covering both core industrial uses and warehousing). Authorities are aiming to bridge the gap through intensification and spaceless growth. The balance of need and supply has not been quantified at this stage.
- 2.28 The timing of supply gaps, and their implications for planning, vary between authorities within the core area. Slough and the former South Bucks district are in a different position to RBWM, because their plan-making is at earlier stages.
- 2.29 The Royal Borough has an adopted Local Plan, which covers the period to 2033, and provides enough land to cover needs over that period, as measured by the methods applicable at the time the plan was submitted. Therefore the Royal Borough does not have a supply deficit at present, either for housing or employment land. The message from our analysis is that deficits are likely to emerge in future plan reviews, assuming that current assessments of need – including the standard method for housing – remain valid. (If methods for assessing needs change, the question will have to be reconsidered of course).

- 2.30 The proposed Spatial Strategy (2020), which was the first step in formulating proposals, suggests that the supply identified so far falls short of need over the plan period. Therefore, there is an immediate need to look for more development sites for Slough's needs, including sites beyond the administrative boundary. For Slough, a plan that will run to 2040 is in the early stages of preparation.
- 2.31 Finally, there is an emerging Local Plan for the part of Buckinghamshire that is the subject of this study, but it is at an early stage, its draft spatial strategy has yet to be devised and there is no official housing need figure at present (noted the previous combined need of 3,000). It may be that, under a future Buckinghamshire Local Plan, unmet demand from Southern South Bucks is accommodated elsewhere in Buckinghamshire. If this happened, so that South Bucks no longer had a shortfall, this would still leave a shortfall of around 9,000 homes in Slough and RBWM over the study period to 2039.



### 3 Potential new supply – brownfield land

3.1 In the last chapter we concluded that, if current assessments of development needs remain valid, the land supply currently identified in our core study area will not be enough to meet those needs to 2039. The next step in our study is to look for possible additional land supply, both in the core area and the wider study area (area of search).

3.2 In line with national planning policy, the first step is to look for potential development capacity on brownfield (previously developed) land. Para 120 of the National Planning Policy Framework (2021) states

*‘Planning policies and decisions should: [...] give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land...’*

3.3 Below, we consider brownfield development capacity first in the core study area and then in the wider study area (area of search). We focus on housing, as the main focus of the study. We take a cautious approach. If we were to present an over-optimistic picture of the area’s land supply, it would not be supported when policies based on our evidence are tested at examination.

#### The core study area

##### Emerging Local Plans

3.4 RBWM has a recently adopted plan, which has made the choice to release greenfield land both for housing and economic development. The Council’s stated position is that there was no new or additional capacity that could have been used in place of greenfield land releases. As part of examination in public, the Council was challenged by the Planning Inspector to demonstrate that they have maximised the potential of brownfield land before considering Green Belt releases. The Inspector’s Report<sup>11</sup> concluded in para 99 that “the Council has sought to maximise the use of previously developed land by pursuing an urban spatial strategy...it is very unlikely that the capacity of brownfield land has been underestimated to the extent that Green Belt release would be unnecessary”. She also states, in para 101 that “Essentially, the scale and type of housing and employment needed in the Borough cannot be met on non-Green Belt sites.”

3.5 Similarly in Slough, evidence supporting the emerging development plan has found that brownfield and urban land supply in the borough is not sufficient to meet assessed needs. This is why the Council is consulting on the proposed Green Belt releases to provide family housing (to meet community need and balance the new build supply of flats). However, as the plan is at an early stage, this approach has not yet been tested at examination.

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<sup>11</sup> Report on the Examination of the Royal Borough of Windsor & Maidenhead Borough Local Plan, 2013-2033, published 26 January 2022

- 3.6 For the former South Bucks district, there is very little brownfield land, and little planning evidence to go on in the emerging Buckinghamshire Local Plan which covers this area. But it seems highly unlikely that brownfield land can make a meaningful contribution to meeting the area's own housing or economic needs, let alone any shortfall from Slough or RBWM. The Economic Development and Employment Topic Paper, produced in 2017 to support the Chiltern and South Bucks Local Plan before the plan was withdrawn, notes at para 72:

*'88% of Chiltern and 87% of South Bucks are in the Green Belt, and 72% of Chiltern district falls within the Chilterns Area of Outstanding Natural Beauty, which is afforded additional protection under NPPF paragraph 172. The districts simply do not have large reserves of brownfield sites available, as is the case for example with some London boroughs. These constraints realistically mean that land availability is at a premium, makes it challenging to achieve growth and development targets, and of course this offers limited scope to reuse brownfield land to meet (in particularly) employment floorspace targets, as set out by NPPF paragraph 137.'*

### Can we use identified sites more intensively?

- 3.7 There is a temptation, in a study such as this to simply 'overwrite' assumptions made in adopted and emerging plans regarding site capacity and delivery. For example, if the relevant plan assumes that housing sites will be delivered at an average 40 dwellings per hectare, we might replace this with 50 dwellings per hectare.
- 3.8 In our opinion this is not advisable, because it would replace robust, site-specific evidence with arbitrary assumptions. In Slough, for example, the capacities of all the sites in the town centre – which is the main location for new housing - were assessed in the Regeneration Framework<sup>12</sup>, through detailed site appraisals and viability assessments. There is no evidence to suggest that higher densities would be feasible or desirable.

### Can we make better use of industrial sites<sup>13</sup>?

- 3.9 We have considered whether unwanted industrial space could be redeveloped for housing, and so reduce the need for new housing land. Also, briefly, whether existing industrial estates could be intensified, so that land could be released for housing while retaining the same industrial floorspace; or alternatively the same land areas could accommodate more industrial floorspace).

### *Demand and supply of industrial space*

- 3.10 Regarding the first question, we have already shown in Chapter 2 that industrial land supply in the core area fall short of need. This suggests that there is little or no scope to replace industrial floorspace with housing. As we understand it, this

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<sup>12</sup> Urban Initiatives Studio for Slough Borough Council, Slough Regeneration Framework, Third draft report, August 2020

<sup>13</sup> As a reminder, the term 'industrial' in this report covers both manufacturing and logistics.

is confirmed by market evidence showing that vacancy rates in the industrial stock are very low, and there is positive demand for more land— particularly for logistics related to the M4 corridor and Heathrow. The Eastern Berkshire FEMA study (2016) commented on the Slough market as follows:

*‘The pace of new industrial development in recent years has been overtaken by strong levels of occupier demand, to the extent that there is reported to be a record low level of vacancy amongst existing industrial property. Beyond the ongoing piecemeal redevelopment by Segro of existing premises and sites, local commercial agents consider there to be limited scope for intensification of the site to accommodate more development in future, partly due to the occupier requirement for lower density yard space and associated facilities on site.’<sup>14</sup>.*

### Data centres

- 3.11 Another factor affecting the commercial market is the conversion of employment space to data centres, particularly at the Slough Trading Estate and at various sites along Bath Road in Slough. For example, SEGRO has come to an agreement with the European data centre platform, Global Technical Realty (GTR) to construct a data centre in Slough providing 37,200 sq m (400,700 sq ft)<sup>15</sup>. Once completed, the project is expected to create around 80 permanent jobs – an employment density of 466 sq m per job. By contrast, typical densities are considered to be around 40 sq m per job in manufacturing and up to 100 sq m per job in strategic warehousing<sup>16</sup>.
- 3.12 Other sites that have undergone conversion to data centres, or are planned to, include: the Sara Lee factory and Unilever building on Bath Road, opposite Slough Trading Estate; a one-million sq ft office building at 270 Bath Road; and the Langley Business Centre, among others. Such conversions aggravate the shortage of employment space, because they take up large amounts of floorspace while providing very few jobs. Data centres can also require very high power volumes, threatening supply to existing and new homes. Generating and Network companies have duties to supply under the electricity act but require a 5-10 year lead in time under the OFGEN regulatory regime approving their capital programmes. For example, the GLA have recently advised several west London boroughs that due to data centres taking up supply, there is a shortage of supply for future residential and commercial developments, with the potential for a 10-year delay on development.
- 3.13 Note; there is no suggestion that data centres should not be permitted on industrial sites, only that the growth of this sector has specific implications for the capacity of existing sites (and land) in Slough to accommodate job growth or other forms of economic activity.

<sup>14</sup> Eastern Berkshire FEMA Study (2016)

<sup>15</sup> [GTR and SEGRO agree first UK data centre facility, datacentremagazine.com](https://www.datacentremagazine.com)

<sup>16</sup> See for example Homes and Communities Agency, Employment Density Guide 2<sup>nd</sup> edition, November 2015

### *Industrial intensification*

- 3.14 In regard to intensification of industrial sites, we can learn useful lessons from the recently adopted London Plan. The draft plan at policy E7 looked to meet both economic and housing needs by intensifying industrial sites, so they could both provide more industrial floorspace and release land for housing. However, the examining Inspectors described this approach as *'aspirational but not necessarily realistic'*. They found that there was not enough evidence to show that such intensification would be deliverable. 'As stated in representations from developers, including SEGRO, this is partly because industrial occupiers value yardage space, so schemes with too-high site coverage do not meet occupier demand. It is also because multi-storey industrial buildings are generally unviable to develop, as the value gained by increasing lettable floorspace is offset by higher construction costs.
- 3.15 From this evidence, the London Plan Inspectors concluded that industrial intensification could not be relied upon to meet London's development needs. The Secretary of State concurred with this view<sup>17</sup>. In our view the same applies to our core study area, especially as the area has no track record of delivering high-density, multi-story industrial buildings. Therefore it would be unsafe to rely on industrial intensification to make significant inroads on development needs, either for housing or employment land.
- 3.16 However, this conclusion should be kept under review. Covid has greatly strengthened the demand for industrial space, including (especially) logistics, as retailing has shifted from the high street to online. There is also some market evidence that the market may be tipping in favour of multi-storey industrial. Thus, in September 2021 SEGRO made a planning application for a new-format mixed-use building at Liverpool Road (Slough Trading Estate), designed for users that do not need servicing yards. The building would be on seven floors with the second to fifth floors comprising light industrial space<sup>18</sup> for SMEs.
- 3.17 SEGRO's new-format building is only a proposal at this stage, and the Slough Trading Estate is not necessarily typical of the general property market in the core study area. Nevertheless, the proposal suggests that in the medium term industrial intensification in Slough may be delivered successfully, at least in relation to some types of industrial use.

### *Can we make better use of town centre land?*

- 3.18 Both the office and retail sectors look very different now to pre-Covid days. For offices, at the time of writing this report, no consensus has emerged regarding future ways of working. Many recent deals reported by agents and the property press could be described as 'distressed,' with occupiers looking to cut costs or take additional 'contingency' space to respond to short term Covid signals. In the

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<sup>17</sup> Ministry for Housing, Communities and Local Government letter to Mayor of London dated 19 March 2021: [https://www.london.gov.uk/sites/default/files/letter\\_to\\_sos\\_robert\\_jenrick\\_19.03.2021.pdf](https://www.london.gov.uk/sites/default/files/letter_to_sos_robert_jenrick_19.03.2021.pdf)

<sup>18</sup> Application No P/19650/000

longer term, some commentators consider that homeworking will permanently reduce the demand / need for office space. There are also suggestions a new flexible office market will emerge, providing a new source of demand for very local offices, as alternative to home working or commuting to larger 'main offices'.

- 3.19 In short, it may be that in future office demand may fall, or grow more slowly than current plans expect, so that it will release land for other uses. But it is too early to be confident about this or quantify the scale of decline.
- 3.20 For retail the position is different, as demand was already falling steeply before Covid, and the pandemic has accelerated the process. Over the study period we expect that the collapse of the high street will provide capacity to deliver new office and / or new homes in the main town centres, and possibly on local high streets. However, one important consideration may be that the type of sites released in town centres and high streets may not match the profile of demand and particularly the need for family housing which is harder to secure on brownfield sites. Detailed local work would be needed to confirm this source of supply.

### The wider study area

- 3.21 There are two main possible sources of additional brownfield supply around our core study, over and above land currently identified.

#### London

- 3.22 The first source is London. In the WAGS part 1 report, we noted that a major driver of housing demand in the core study area (especially Slough), was the outward migration flows from the west London boroughs (especially Hillingdon). The official demographic projections, on which the housing need calculation is based, broadly assume that this migration continues in the future. But if West London were to provide more housing than it did in the past, out-migration to our core area would be lower than it was in the past, and hence housing demand would in the core area would also be lower.
- 3.23 However, in practice this is unlikely to happen. The view of the adopted London Plan 2021, supported by Inspectors and the Secretary of State, is that the capital does not have the capacity to meet its housing need in full. One reason for this is that, as discussed earlier, the draft plan was considered unrealistic in its view of how much industrial land could be released for housing.
- 3.24 As part of this study we approached Hillingdon Council to ask whether the borough could potentially increase its planned land supply, including through industrial intensification and industrial land releases. The Council responded that there was no scope for this, and if any additional supply did emerge (whether brown or green field) it would be used to meet the needs of other London boroughs, in line with the logic of the London Plan. On the wider question of what would happen if London as a whole could meet or exceed its needs in full, we were referred to the next review of the London Plan, which has not yet started.

- 3.25 In summary, there appears there is no brownfield capacity in London generally, or Hillingdon specifically, that could help meet housing need from the study area.

### Bracknell Forest

- 3.26 The other local planning authority of which a large part is in our wider area of search is Bracknell Forest. That authority's pre-submission Local Plan was published for consultation in March 2021 and the plan was submitted for examination in December 2021. Of the new housing allocations proposed in the plan, by far the largest is the Jealott's Hill garden village, on land to be released from the Green Belt to provide 2,000 new homes (of which 1,350 to be delivered in the plan period, 2020/21 – 2036/37).
- 3.27 In short, Bracknell Council's current view, based on evidence supporting the 2021 emerging plan, is that it has no brownfield capacity for housing development over and above the sites already identified in that plan. Indeed the plan proposes to release Green Belt land, including a large site at Jealott's Hill, although this is justified to support the existing occupier of the site and not simply to meet housing need. But as with others in the area there is no hidden supply of new land that could be brought forward in development plans.

### Summary

- 3.28 In this chapter we considered whether brownfield land supply, additional to that already identified, could fill the gap between housing need and demand in the core study area. We have concluded that this is unlikely, either in the core study area or through neighbouring authorities in the wider study area importing the area's unmet need.
- 3.29 One reason for this is that, in both groups of authorities, emerging plans and their supporting evidence bases have already tried to maximise brownfield land supply – leaving no stone unturned to identify opportunities in built-up areas and on previously developed land. Despite these efforts, the plans cannot identify enough brownfield land to meet needs, and several resort to allocating greenfield or Green Belt sites. For RBWM – the only authority whose plan has been examined and adopted so far – the examining Inspector has supported this conclusion.
- 3.30 For the three authorities in the core study area, we have also looked closely at different potential sources of additional brownfield housing supply. We have found that these sources cannot be relied upon to close the gap between housing need and supply.
- 3.31 In particular, redevelopment of existing industrial sites looks unpromising, because industrial land is also in short supply, so that redeveloping it for housing may just 're-arrange the deckchairs' – replacing a deficit of housing land with a deficit of employment land. We do recognise that intensification of industrial sites, providing high-density redevelopment in multi-storey buildings, may help fill the supply gap. The scope for this should be kept under the review. But at this stage

it would be imprudent to expect a significant contribution for such intensification, because it may not be viable or deliverable on a meaningful scale.

- 3.32 A further likely source of additional housing capacity is the restructuring of town centres and high streets, where the continuing decline of retail will land and buildings for other uses. The likely result is additional supply both for offices and for housing – though generally not family housing. This possible source of supply has changed rapidly with Covid and as this study progressed. At the study commencement it was widely recognised that High Streets needed to change and, in the case of RBWM, redevelopment of their town centre retail stock is a allocation in the new plan. But the speed and varsity of the decline has been influenced by Covid. We cannot consider this supply here but in line with general planning principles priority should be given the Brownfield options when they emerge. But for our work it is, at the moment, unlikely that renewed town centre regeneration will remove the need for new land in the future.
- 3.33 Overall, the evidence suggests that, if the core area's development needs are to be met over the study period, significant greenfield supply will have to be identified. In the next section we aim to identify where this supply might be.

## 4 Potential new supply – greenfield land

- 4.1 In this chapter we aim to identify potential greenfield land for development across the study area, focusing on strategic opportunities. For this we have taken a sequential approach:
- As a first step, we have identified a long list of *broad locations*, comprising undeveloped land free of ‘strategic’ or ‘absolute’ constraints on development – i.e. constraints that probably cannot be overcome or mitigated.
  - At the second step, we have refined those locations into a short list of potential development opportunities that we call *parcels*, based on detailed qualitative analysis of opportunities and constraints.
- 4.2 As agreed with the client at the outset, we have not counted the Green Belt as an absolute constraint. Throughout the analysis, Green Belt land is considered for potential development on the same criteria as other land. This is partly pragmatic because it is recognised that the area is unable to accommodate strategic growth without reviewing its policy constraints and while Green Belt is a serious constraint it is periodically reviewed in line with national policy.
- 4.3 As an Appendix to this report we have provided a site-by-site summary of our assessments.

### Broad locations

- 4.4 At this stage we have used GIS to identify tracts of undeveloped land across the study area, excluding urban areas and sites already identified for development (including in emerging development plans). From this long list we have included pieces of land which:
- Are free of absolute (strategic) constraints, suggesting that they may be suitable for development, subject to more detailed assessment
  - Meet minimum size standards, to qualify as strategic opportunities.
- 4.5 As absolute constraints we have counted the following:



**Table 4.1 Absolute constraints**

Ancient Woodland	RAMSAR	Battlefields
AONB	RSPB reserves	Historic Parks and Gardens
European Protected Site Table setting out	SAC	Ancient Monuments
National Nature Reserve	SPA	World Heritage Sites
National Parks	SSSI	Risk of flooding from rivers (Flood Zones 2 & 3)
Gas pipeline	Specific National Trust designations and covenants	

- 4.6 In terms of size, we have applied different thresholds depending on geography. For sites that are well related to existing urban areas, so they could potentially become urban extensions, we have used a minimum of 25 ha. For sites remote from urban areas, where development would have to 'stand alone', we have only counted areas over 100 ha. This is a very cautious assumption. We use it because a free-standing development will need more land for infrastructure, buffering to retain settlement gaps etc, and open space in line with Garden Community principles.
- 4.7 The above produced a list of 20 broad locations, which were analysed further as set out in the next section.

### Potential development parcels

- 4.8 At the next step, we reviewed each broad location in detail, to assess its suitability for development and draw the boundaries of possible development areas. The review refined our earlier selection, translating the broad locations into potential development parcels.
- 4.9 We first shared details of the 20 locations with the client team, to ascertain whether there were any that should not be progressed, or others areas that had been missed. Strategic policy issues were identified, including dangers of coalescence between settlements and opportunities for regeneration. We also considered authorities' land availability assessments, to identify whether any sites had previously been put forward for development and what issues had arisen.
- 4.10 Following comments and information received from the authorities, we undertook a detailed assessment of the broad locations, to consider their wider suitability, sustainability and deliverability for development. The factors taken into consideration are set out below. Within our multi-disciplinary team, each topic was covered by one or several specialist professionals.

### Non-strategic constraints

- 4.11 Non-strategic constraints are constraints that are not an absolute barrier to development, but rather might be overcome or mitigated through good and sensitive planning. We have used GIS to map those constraints for the core study area and they are listed in the table below:

**Table 4.2 Non-strategic constraints<sup>19</sup>**

HS2 Safeguarded Zone	Chiltern/SB
Emerging Local Plan Key Employment Sites	Chiltern/SB
Conservation Areas	Chiltern/SB
Public Safety zone	Slough
Conservation Areas	Slough
Local Plan for Slough 2010 Site Allocations	Slough
Major Dev Sites 2010	Slough
Wildlife Heritage 2010	Slough
HELAA 2019	RBWM
Ascot Growth Area	RBWM
Employment Sites	RBWM
Site Allocations	RBWM
SPA 400 buffer	RBWM
R19 housing	RBWM
Local wildlife sites	RBWM
Minerals Local Plan Pref 97 2001	RBWM
Minerals Waste Draft Plan sites	RBWM
Waste local plan Pref Area 98	RBWM
Contaminated Land Site	RBWM
Conservation Areas	RBWM
SANG	RBWM
Draft BLP pause period sites	RBWM

*Note – At the time this study commenced the Draft South Bucks plan was expected to progress and so sites that were proposed for allocation were not included in this work. They need to be considered as part of ongoing plan making work.*

### Transport and connectivity

- 4.12 The current strategic transport networks are not designed to access large parts of the study area, and the local network is unable to accommodate significant growth without investment. Therefore transport is a key issue for almost all the potential development parcels.
- 4.13 When assessing each parcel we have considered:

<sup>19</sup> Note – these focus on the Core Area. It was intended these would be extended to the whole study area if needed. But in event parcels outside the core were dismissed before detailed local constraints were needed to be assessed.

- The current availability of, or need for new, strategic road infrastructure – to connect potential sites into the strategic network (M4, M40, M25 etc);
- The current availability, or need for, new, local infrastructure appropriate for relevant local journeys to places we may expect people to work, shop or visit regularly. This is likely to be connectivity to the related major towns or employment locations and may not be dependent on the primary road network;
- Current and potential new accessibility to fixed link public transport assets including the rail network and Heathrow;
- Scope to provide new public transport links – including new bus links to, from or through the land parcels, to provide local sustainable transport options; and,
- Scope to provide other sustainable links to likely off-site destinations (places of work, shops and higher tier service centres) including walking and cycling options.

### Landscape

- 4.14 We have used existing landscape assessments to provide a view of the sensitivity of the land parcel to accommodate new development and guide the assessment away from areas considered less suitable.
- 4.15 The assessment is, by nature, qualitative and opinions will differ. We have, however, discussed our assessment with officers from Slough, RBWM and Bracknell Forest.

### Heritage

- 4.16 We have considered whether the presence or proximity of heritage assets and their setting may constrain the scale, location and type of development which would be appropriate. The assessment included listed buildings, conservation areas, archaeological sites and other historic assets.
- 4.17 This process also requires an element of judgement, as opposed to a formulaic approach, because the setting of an asset is not absolute, but open to interpretation. So for example a land parcel could fall within the vista of a designated asset by nature of the topography and landscape setting of that asset. Another site, at the same distance from the asset, may not be affected because it is hidden by the topography or other features.

### Utilities

- 4.18 Utilities are unlikely to be a definitive obstacle to development because providers are under a statutory duty to meet development needs. However, where connection points are absent this can cause delay in delivering schemes. The routing of utilities can also result in some land being not developable or fragmented. Therefore, our utilities assessment will focus on the availability of major connection points in proximity to each parcel.

## Flooding

- 4.19 Stantec Hydrology teams have considered the areas where flood risk is likely to result in land not being developable. We have used the most recent flood data available from the Environment Agency and our assessment was reviewed by consultants working on behalf of RBWM (for their sites).

## Ecology

- 1.1.1 The ecology component of the site assessment has considered the potential impacts on important ecological features generally and also specifically addressed the relationship between site options and key designations, including European Sites, SSSIs, Ancient Woodland. We have taken account of the potential presence of protected species, where known.
- 4.20 SAC (special areas of conservation) and relevant buffers boundaries around the SACs were considered. However, it should be understood that in relation to HRA this project only needs to provide a proportionate 'assessment evidence base' to inform future decision making and formal HRA processes, rather than a formal HRA being required at this stage.

## Social sustainability and placemaking

- 4.21 Our Planning team undertook a review of the broad locations to consider key features of strategic social sustainability and placemaking importance.
- 4.22 Primarily this considered social sustainability in respect of access to services and social infrastructure essential to the community. Services here refers to shops such as grocery stores that the community would need regular access to, and social infrastructure refers particularly to essential infrastructure like schools and primary healthcare, but also may refer to community halls, sports and leisure facilities, and so on.
- 4.23 The assessments have also considered, where relevant:
- The ability of the location to be of sufficient scale to justify need for services and social infrastructure within the site;
  - Proximity to existing services and social infrastructure, and where new development within the development parcel may require expansion of services or social infrastructure elsewhere;
  - Access to existing sites that contain employment uses (if residential), via the strategic road network, active or public transport; and,
  - Limitations on positive placemaking due to severance by, particularly, transport infrastructure.
- 4.24 Our assessment is the result of a desktop study only, incorporating Open Maps data as the source of location data for services and infrastructure. It is limited in the sense that it does not include insights from local social infrastructure providers. It does not, for example, take account of existing capacity, or projected capacity through already planned services or infrastructure.

- 4.25 We have an established approach to this, developed through many rounds of infrastructure funding studies, that identifies the scale of new housing required to provide onsite provision.
- 4.26 Given the geography of the area, we think it is important to recognise that development could change the area's character and sense of place. Major new development may erode settlement gaps and the sense of place in village communities, for example or a collection of development parcels could urbanise rural parts of the study area. Expanding or enveloping existing communities with new strategic development obviously changes the sense of place and character of those communities.
- 4.27 This is obviously subjective, but it is important that the assessment recognise that new development will change existing communities' sense of place, and that those communities be aware that this is actively being considered in this assessment. Also this should be flagged as an area for future work. Because this will be locally sensitive and runs the risk of concluding all development has a negative impact on local communities' sense of place.

### South Bucks Minerals Safeguarding

- 4.28 Note that all sites in former SBDC area are within the Minerals Safeguarding area of the Buckinghamshire Minerals and Waste Local Plan. The potential for mineral reserves is therefore an important consideration for the timing of the delivery of these sites generally, and so that prior extraction to ensure that these finite mineral resources are not lost. In terms of the assessment of parcels, this designation has not altered the shape of any of the parcels, but the concept of safeguarding is relevant to the issue of development timing.

### Results

- 4.29 In the process, one broad location was discarded and the others saw their boundaries tightened and/or shifted. This also resulted in a couple of sites falling below the minimum size threshold.
- 4.30 The result of the analysis is a set of 16 parcels that potentially provide strategic development opportunities. The parcels are listed and mapped below. In the list (Table 4.3), we show land areas both for broad location and proposed development parcels.

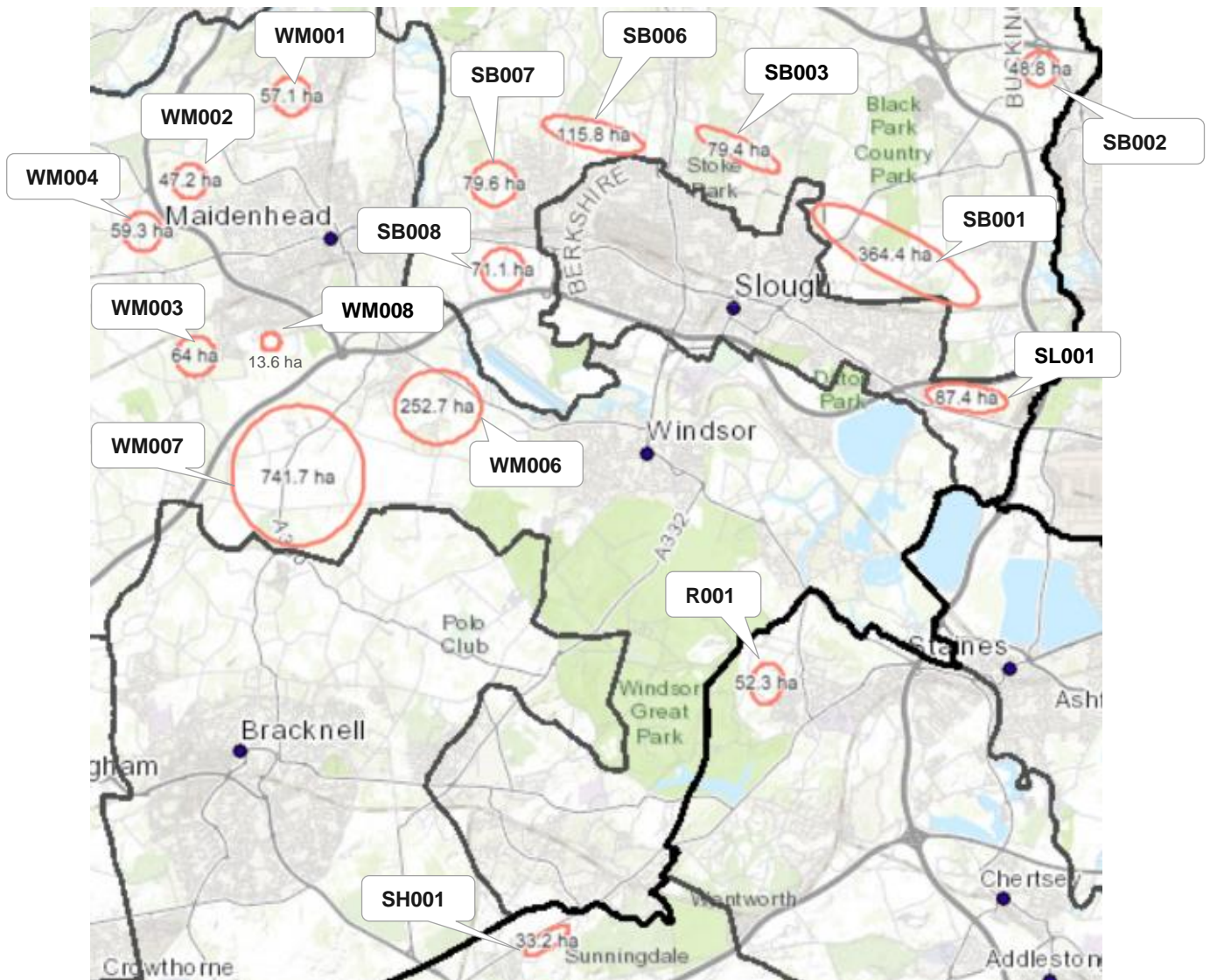
**Table 4.3 Potential development parcels**

			Land area, hectares	
			Broad location	Potential parcel
1	SL001	North of Colnbrook	87	86
2	SB001	North-east of Slough	1,137	364
3	SB002	South of M40 / A412	117	49
4	SB003	North of Famham Royal	228	79
5	SB006	North of Britwell, West of Famham Common	454	115
6	SB007	Between Bumham and Taplow	141	79
7	SB008	West of J7 / South of A4	94	71
8	WM001	West of Cookham	223	57
9	WM002	East of A404, south of Bisham	168	47
10	WM003	South of A4 / Walthams	656	64
11	WM004	East of Burchetts Green	127	59
12	WM006	A308 East of Holyport	339	252
13	WM007	Paley St	3,794	741
14	WM008	South of Cox Green, Maidenhead	26	14
15	B001	South East of Bracknell	638	n/a
16	R001	West of Englefield Green	99	52
17	SH001	North of Windlesham	205	33
<b>Total</b>			<b>8,533</b>	<b>2,162</b>

**Note**

B001 has been given no parcel land area due to the decision to exclude it from further analysis. The reason for this is explained in the individual site assessment in the Appendix but largely related to the fragmented nature of the parcel meaning that it failed to be identified as a development parcel.

**Figure 4.1 Potential development parcels**



Note: no parcel was drawn for B001 due to the extent of designations rendering it impractical as a parcel – hence there being only 16 sites remaining

### Development capacity

4.31 In the site-by-site summaries in the Appendix, we have included our view of the likely uses of each parcel, recognising that not all sites would be suitable for the same kinds of development. Larger parcels are generally expected to be mixed use; for example, a new settlement will need employment space, retail, services and supporting infrastructure as well as housing. Smaller parcels are generally assigned to housing, particularly those that would provide urban extensions to existing settlements. One parcel, SL001, in our view is suitable for 100% employment, due to its location and amenity issues.



- 4.32 We have estimated the number of homes that could potentially be delivered at the sites we have identified. (The estimate covers all parcels, including SL001 – which realistically is more suitable for employment).
- 4.33 This is a difficult assessment to make because development density is highly variable and sensitive to its setting. In theory any of our sites could accommodate high-rise flatted development at very high densities. But for obvious practical reasons this would not be a sound assumption in the present study.
- 4.34 To determine development density (dwellings per hectare, or dph) we have used a typology that is also used for the viability analysis in Chapter 5 (Table 5.4). The assumed net density is a constant 35 dph, but gross densities vary according to the scheme size (number of homes).<sup>20</sup>
- 4.35 The table below shows the estimated capacity of each parcel, based on the Chapter 5 typology. For each parcel, we use the gross density that is most closely aligned with the site sizes in Table 5.4. For example, the land area of WM007 Paley St area is 741 ha. The closest gross site area in Table 5.4 is 714 ha and has a corresponding typology of H10,000, with a gross density of 14 gross dph. The resulting capacity for the parcel is therefore  $(741 \times 14) = 10,374$  dwellings, rounded to 10,400.

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<sup>20</sup> In this study we have not estimated capacity for industrial uses. If this is done in future, we would suggest an assumed plot ratio of 45% net. This reflects the fact that the main driver of demand. As discussed earlier, the ratio may increase in future if high-density industrial formats prove deliverable on a larger scale, but at present we cannot rely on this.

**Table 4.4 Estimated housing capacity of potential development parcels**

	Typology	Gross dwellings /ha	Indicative potential capacity, dwellings*	Notes
SL001	C1,000	21	1,800	Site more likely suitable for non-residential uses only
SB001	G5,000	16	5,800	
SB002	C1,000	21	1,000	
SB003	C1,000	21	1,700	
SB006	D2,500	19	2,200	
SB007	C1,000	21	1,700	
SB008	C1,000	21	1,500	
WM001	C1,000	21	1,200	
WM002	C1,000	21	1,000	
WM003	C1,000	21	1,300	
WM004	C1,000	21	1,200	
WM006	E5,000	18	4,500	
WM007	H10,000	14	10,400	
WM008	A250	25	400	
B001	n/a	n/a	n/a	No development parcel identified
R001	C1,000	21	1,100	
SH001	B500	23	800	
Total			37,600	

\* Dwelling numbers are rounded to the nearest 100.

4.36 In total, the estimated capacity of the potential development parcels we have identified is 37,600 homes. This assumes that none of the land comes forward for non-residential uses – beyond incidental uses we would expect as part of a large development. If we exclude SL001, because it is more likely to be developed for employment, total capacity is 35,800 homes.

4.37 In Chapter 6 below, we will develop alternative spatial options based on those parcels. But first, in Chapter 5 we assess the viability of development.

## 5 Development viability

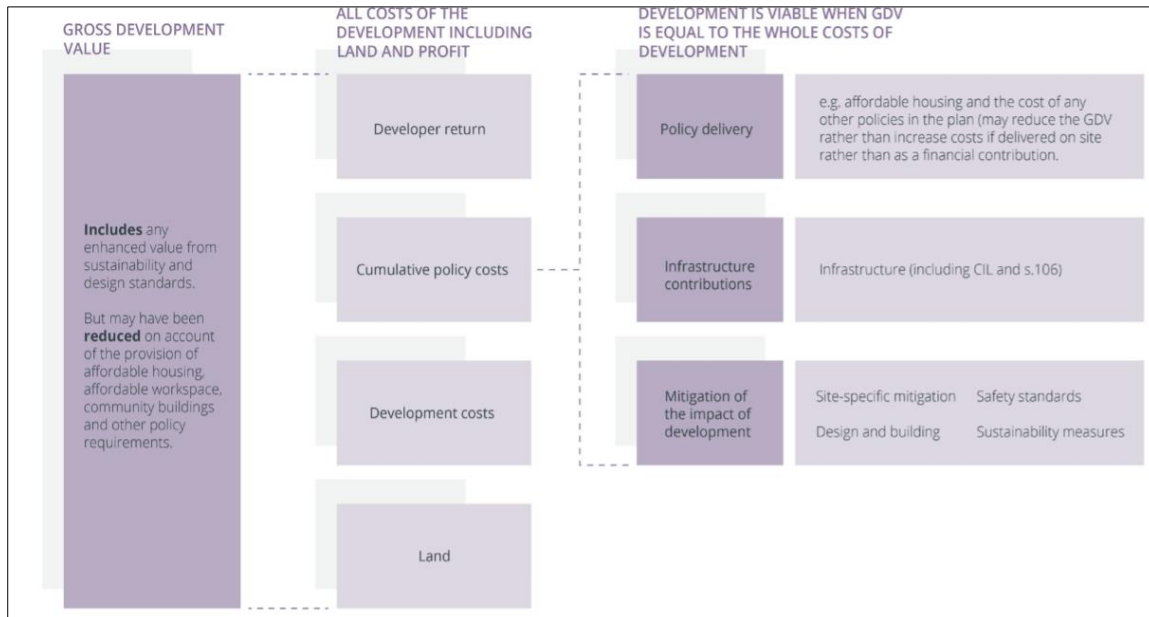
### Introduction

- 5.1 Above we have identified land which appears capable of being developed for housing or employment, including a review of Green Belt land. Although we recognise that while there may be infrastructure available there is also widespread concern that there is insufficient capacity in this infrastructure to support growth. This is a challenging issue for many local authorities because there is rarely 'spare' infrastructure capacity – physical or social.
- 5.2 In the current planning system, where there is no (or limited) infrastructure to support growth, there is an expectation that new development will either pay or make a meaningful contribution towards it. New development is also a way to secure local gaps in infrastructure provision to the benefit of the new homes and also nearby communities.
- 5.3 Smaller scale developments are less able to make meaningful contributions in addressing significant deficits in infrastructure provision e.g., a 200 unit scheme is unlikely to deliver a new school where it may be needed but instead make a contribution to mitigate its impact on existing provisions. Whereas a large site, in the order of 1,750 homes, may be expected to provide a whole new two form entry school and a site much larger (e.g., 5,400-6,000 dwellings) a whole new secondary school. Large scale developments are also likely to be able to support new GP surgeries and other community facilities.
- 5.4 But with some large sites the infrastructure requirements may be so great that the development itself may not be able to fund everything required to make the development suitable in planning terms. In these cases, various external funding routes (e.g. Homes England, National Highways, etc.) is used to address any deficit. Funding is subject to successful bids from the site promoters / developers to the agencies.
- 5.5 In recent years funding agencies have orientated their growth spending towards areas where investment unlocks new housing (or employment in some cases), this being one of the assessment criteria in the bid process.
- 5.6 With the issue of whether standalone development can support infrastructure requirement and to support the spatial options, we have undertaken high-level viability testing. The purpose of the viability testing is to inform which areas can viably support the cumulative impact of:
- Affordable housing
  - Infrastructure provision
  - Climate change mitigation
  - Biodiversity mitigation

## Method

- 5.7 To undertake the viability testing we have created a bespoke Microsoft Excel model. The model calculates the Residual Land Value (RLV) for each scenario with results displayed in a series of tables. In simple terms, the residual method works on the basis that a developer knows the end value of the scheme and knows the development costs (construction, interest and developer's profit). By deducting the total costs from the end value, the developer knows what can be bid for the land. The residual framework is set out below.

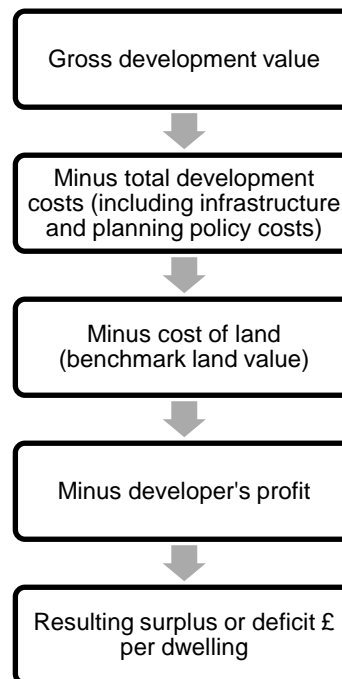
**Figure 5.1 The residual valuation framework**



Source: RICS, 2021, Assessing viability in planning under the National Planning Policy Framework 2019 for England

- 5.8 Typically, viability assessments for plan making purpose, make a comparison between the residual land value and a benchmark land value to assess whether the scheme is viable i.e. if the residual land value equals or is greater than the benchmark land value the scheme is deemed viable. If the residual land value falls below the benchmark land value then the scheme is unviable. In our assessment, we have treated the benchmark land value as an input into the appraisal to allow for timing of land payments, with the output of the appraisal producing a surplus / deficit. An assessment can then be made whether the scenarios assessed can fund strategic infrastructure and potential future policy costs from any surplus generated.
- 5.9 The diagram below summarises the viability assessment of how the development surplus or deficit is calculated.

**Figure 5.2 Generation of development surplus or deficit results**



Source: AspinallVerdi

- 5.10 To supplement our results, we have also run a number of sensitivity tests to account for changes in Gross Development Value (GDV) and infrastructure costs.
- 5.11 Our testing has considered separately residential and industrial and warehouse space, no other uses have been considered at this stage.
- 5.12 Viability inputs have been derived from a combination of our own research cross-referenced with the councils own viability evidence basis as follows:
- Royal Borough of Windsor & Maidenhead Local Plan Viability Update by HDH Planning and Development, 2017
  - Royal Borough of Windsor & Maidenhead Local Plan Viability Update Note by HDH Planning and Development, 2019; and
  - Chiltern District Council & South Bucks District Council Local Plan and CIL Viability Assessment, by Dixon Searle, 2019
- 5.13 Slough does not have any recent viability evidence base documents, therefore we are unable to draw on data for this area.

### Residential testing

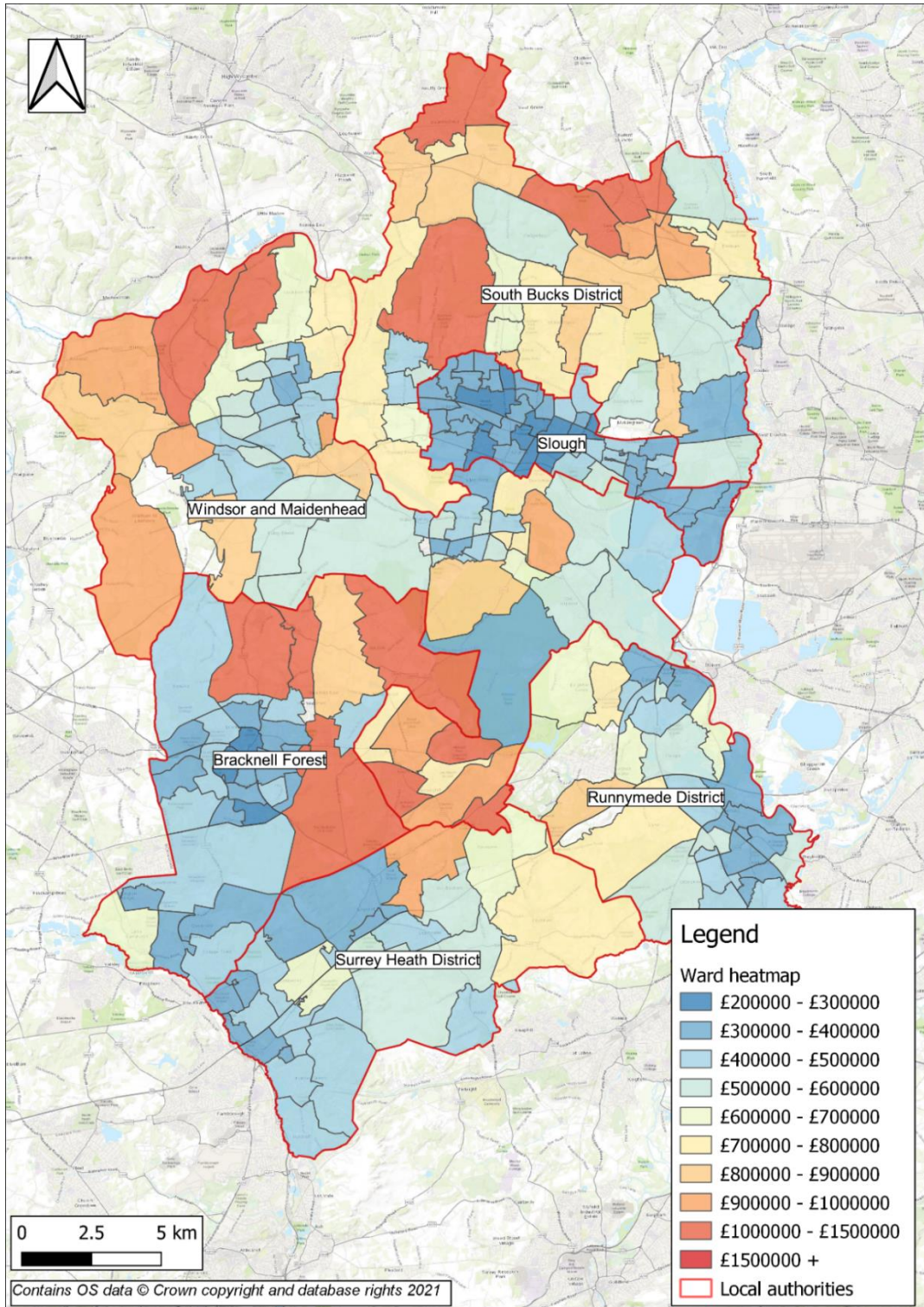
- 5.14 We will now outline the headline inputs that we have used for our analysis.

#### Gross Development Value (GDV)

- 5.15 To inform our GDVs we have undertaken a review of sold prices recorded on HM Land Registry.

- 5.16 Initially, we analysed new and second-hand sales data within the last two years, this analysis allows us to take a high-level view to establish value inputs into the development appraisal. Figure 5.3 Ward heatmap
- 5.17 shows our data analysis of property prices grouped in value bands analysed against ward boundaries.

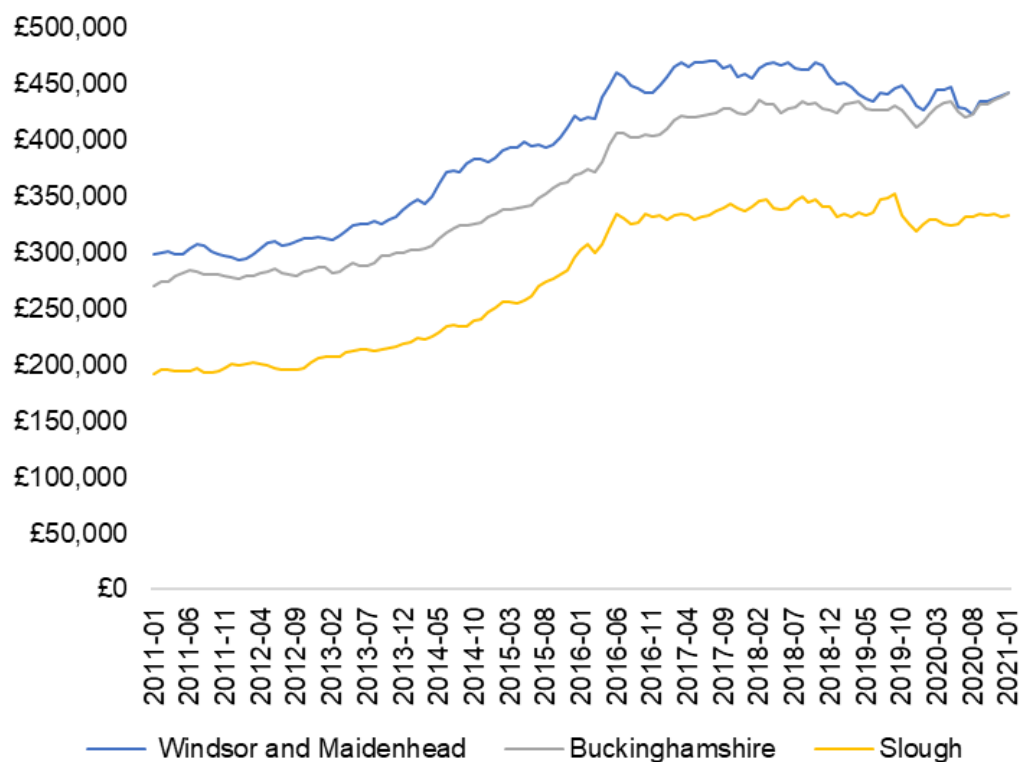
**Figure 5.3 Ward heatmap**



Source: Land Registry, AspinallVerdi

- 5.18 There are higher values on a price per unit basis around the rural wards. The lower value wards are mostly within the urban areas, where typically small and older units are found and hence the lower values. The value zone differences also loosely follow the Green Belt designations around some of the urban areas.
- 5.19 Secondly, we have analysed new sold prices by local authority (Figure 5.4). The data does not split Buckinghamshire into South Bucks and Chiltern Districts, we have therefore had to treat this as Buckinghamshire. The data shows (that the average new build sales values in RBWM have outperformed the other areas over the last 10 years. But the difference has begun to narrow over the last 24-months between Buckinghamshire and RBWM. The most notable difference are the sales values in Slough. New build sale values in Slough have consistently been lower than the other areas. Over the last 24 months, the average new build sale values in Slough were around 30% lower compared to the other areas.

**Figure 5.4 Comparison of new build sold prices**



Source: Land Registry, AspinallVerdi

- 5.20 It is important to recognise that, although Slough has much lower average new build sale values, the homes delivered in Slough are also significantly smaller than those in the other areas therefore leading to a distortion in the analysis on a per unit basis – this is evidenced through a review of Energy Performance Certificate (EPC) data. We have reviewed EPC data for each area over the last 24 months – see Figure 5.1 This data is for all residential property types including new build and second hand. The average floorspaces in RBWM and South Bucks are much larger than Slough. The former two average floorspaces are more akin to houses where Slough's is more akin to flats. Echoing this, is the last Slough Local Development Framework monitoring report (2018/19), explains that 80% of

new units delivered were flats – including many via Permitted Development Rights conversions.

**Table 5.1 Residential EPC data by floorspace**

Location	Average floorspace (all dwellings)
Windsor and Maidenhead	99
South Bucks	132
Slough	68

- 5.21 Overall, analysis of new build sold prices across the study area (using Land Registry new build sales) shows that the values analysed are wide ranging. But, as we know from Figure 5.4, current average new build prices in Buckinghamshire and RBWM are currently similar. Given the high level nature of the testing and data available, we have viability tested with a single set of values (set out in Table 5.2) and reported changes in values through sensitivity testing i.e. lower values could be considered more akin to Slough. The unit sizes used are based on developments that have been delivered by the market and we have cross referenced these to unit sizes that meet the national minimum space standards.

**Table 5.2 Sale value inputs**

Typology	Value	Unit size (sqm)	£ psm
2 bed house	£375,000	75	£5,000
3 bed house	£435,000	90	£4,833
4 bed house	£550,000	120	£4,583
1 bed flat	£240,000	45	£5,333
2 bed flat	£310,000	60	£5,167

- 5.22 We have assessed our sale value inputs in Table 5.2 against those used in the previous studies. This comparison is in the table below.

**Table 5.3 Sale value input comparison**

RBWM input 2019 (HDH)	CDC & SBDC input 2019 (DixonSearle)	Viability input used in WAGS testing	Comment/ justification
3 value zones tested. Values ranged from £4,850 - £5,500 psm. Data collected 2015 and 2016.	10 value zones tested, plus a further 6 value zones for sensitivity analysis for South Bucks. Values range from £4,000 - £8,000 psm. Average new build values	1 value zone tested, with sensitivity analysis undertaken. Values range from £4,583 -	We have independently determined our sales values. Our values are akin to those used in the previous assessments which is expected because sale prices in Figure 5.3 have not



RBWM input 2019 (HDH)	CDC & SBDC input 2019 (DixonSearle)	Viability input used in WAGS testing	Comment/ justification
	range between £5,000 - £5,750. psm Data collected 2017 and 2018.	£5,333 psm.	moved on much since the last assessments.

## Typologies

5.23 At this early stage of testing, specific sites are unknown. We have therefore formulated typologies<sup>21</sup> as the basis of our testing. These are set out in Table 5.4. We have assessed the 250 and 500 unit schemes on a greenfield and brownfield basis, as it is anticipated that development of this size could come forward in urban and non-urban areas.

**Table 5.4 Typologies to be tested**

Typologies (no. of units)	Gross dph	Gross site area ha	Gross to net	Net dph	Net site area ha
A250	25	10	70%	35	7
B500	23	22	65%	35	14
C1,000	21	48	60%	35	29
D2,500	19	130	55%	35	71
E5,000	18	286	50%	35	143
F3,000	18	171	50%	35	86
G5,000	16	317	45%	35	143
H10,000	14	714	40%	35	286

## Development costs

5.24 In establishing suitable development costs to use in the viability testing, in the table below we have reviewed these inputs and assumptions used in the previous studies and where possible reflected this in our assessment for consistency. Where we have deviated, we have set out our input with a comment / justification.

<sup>21</sup> We have used the term typologies here with reference to 'Assessing viability in planning under the National Planning Policy Framework 2019 for England' by RICS (March 2021). This defines scheme typologies as: "[...] the type of development likely to come forward as part of the plan. Scheme typologies relate to development schemes with similar characteristics, such as proposed use, location, scale and value." (Page 9)

**Table 5.5 Residential viability inputs comparison**

Viability input	RBWM input 2019 (HDH)	CDC & SBDC input 2019 (DixonSearle)	Viability input used in WAGS testing	Comment/ justification
Residential build costs – housing	£1,456 psm – based on BCIS Estate Housing re-based for RBW&M.	£1,421 psm based on BCIS Median re-based for the districts.	Housing generally - £1,511 psm based on BCIS upper quartile re-based to RBW&M over the last 5 years. Flats generally - £1,806 psm, as above.	Based on latest BCIS data appropriate source of information as set out in the PPG on viability. <sup>22</sup> We have taken the highest figure from across all the local authorities as a conservative approach to the testing.
External works allowance	Range between 5% and 20%.	Range between 5% and 20%.	Range between 5% and 20%.	Consistent with previous assessments.
Site abnormalities	5% of BCIS build costs for brownfield sites.	Not included.	£110,000 per net acre for brownfield development only.	We have assumed our allowance includes the cost for demolition and remediation. We have had regard to HCA (now Homes England) guidance on dereliction, demolition and remediation costs, March 2015. This is broadly consistent with the RBWM approach.
Statutory planning fees (residential)	2% of development costs.	Based on the national formula.	Based on the national formula.	Consistent with the RBWM study approach.

<sup>22</sup> MHCLG, 24 July 2018, PPG, Paragraph: 012 Reference ID: 10-012-20180724

Viability input	RBWM input 2019 (HDH)	CDC & SBDC input 2019 (DixonSearle)	Viability input used in WAGS testing	Comment/ justification
Planning application professional fees, surveys and reports	Not included.	Not included.	Calculated as a three times multiplier to the national formula above.	This approach is considered reasonable based on other high level viability assessments.
Professional fees	Architects 6%, QS/PM 0.5%, planning consultants 1%, other 3.5%.	8% of build total costs.	8% of total build costs.	Typically ranges between 8% - 12%. Our figure is also in line with the CDC & SBDC assessment. Although lower than the RBWM we have accounted for planning costs separately and they have not.
Contingency	5% for brownfield sites and 2.5% for other sites.	5.0% of build costs.	5.0% of build costs.	Consistent with previous assessments and the high level nature of testing and the potential unknowns.
Residential sales agents	Sales and marketing and promotion 3.0% of GDV.	Marketing and sales cost 1-3% of GDV.	1.5% of GDV.	Sourced from Harman report <sup>23</sup> and comparable schemes. This approach is consistent with the previous studies.
Residential sale legal costs	0.5% of GDV.	£750 per unit.	0.5% of GDV.	As above.

<sup>23</sup> Local Housing Delivery Group Chaired by Sir John Harman, June 2012, Viability Testing Local Plans – Advice for planning practitioners, page 35

Viability input	RBWM input 2019 (HDH)	CDC & SBDC input 2019 (DixonSearle)	Viability input used in WAGS testing	Comment/ justification
Residential marketing and promotion	Included above.	As above.	1.5% of GDV.	As above.
Profit on market housing	17.5% on GDV.	20.0% on GDV.	20.0% on GDV.	As per viability PPG. <sup>24</sup> This approach is consistent with previous approaches.
Profit on affordable housing	6.0% on GDV.	6.0% on GDV.	6.0% on GDV.	As above.
Interest rate	6.0% with no equity for developers.	6% for the build, 7% for land.	7.0% with no equity for developers, inclusive of fees.	This approach is consistent with previous approaches.
SDLT on land value	As per HMRC effective rate.	As per HMRC effective rate.	As per HMRC effective rate.	This approach is consistent with previous approaches.
Agent's fee on land value	Legals and acquisition 1.5%.	1.5% of land value.	1.0% of land value.	This approach is consistent with previous approaches.
Legal fee on land value	Included within above.	0.75% of land value.	0.5% of land value.	This approach is consistent with previous approaches.

## CIL

5.25 RBWM, Chiltern and South Bucks have current CIL charges in place but Slough does not. The CIL charges vary across all the areas. Due to the variable CIL charges combined with the fact that strategic sites are sometimes zero rated for CIL as infrastructure is funded through S106 we have not included this as a cost. Any CIL charges will need to be deducted from any surplus produced.

## Timescales

5.26 Timescales reflect both the development period and the sales period. These are inputs are reflected in the appraisals through the cash flow. It is assumed that the sales of the affordable housing units occur during the build period, in line with how the market operates on a 'golden brick' payment basis. Sales periods for private residential units commence 12 months after the construction of units and

<sup>24</sup> MHCLG, 09 May 2019, PPG, Paragraph: 018 Reference ID: 10-018-20190509

continue 12 months post-construction. It is assumed developers will be build to sale, in our assessment we have considered the timescale used in the Local Plan studies and housing trajectories. On larger sites i.e. 1,000 dwellings and above we have assumed multiple outlets. Our timescales for the scenarios are in the table below.

**Table 5.6 Development timescales**

Typology	Lead in period	Build period	Sale period
250 (greenfield and brownfield)	12 months	63	12 months after build start
500 (greenfield and brownfield)	12 months	83	12 months after build start
1,000	12 months	83	12 months after build start
2,500	12 months	167	12 months after build start
5,000	12 months	278	12 months after build start
Small garden village: 3,000 dwellings	48 months	188	12 months after build start
Large garden village: 5,000 dwellings	48 months	278	12 months after build start
Garden town: 10,000 dwellings	48 months	556	12 months after build start

### Benchmark land value (BLV)

5.27 The PPG provides a clear single method (Existing Use plus premium) in determining the BLV:

*‘To define land value for any viability assessment, a benchmark land value should be established on the basis of the existing use value (EUV) of the land, plus a premium for the landowner. The premium for the landowner should reflect the minimum return at which it is considered a reasonable landowner would be willing to sell their land. The premium should provide a reasonable incentive, in comparison with other options available, for the landowner to sell land for development while allowing a sufficient contribution to fully comply with policy requirements. Landowners and site purchasers should consider policy*

*requirements when agreeing land transactions. This approach is often called 'existing use value plus' (EUV+)<sup>25</sup>.*

5.28 The PPG also sets out the factors that should be considered when establishing the land value, noting that it should:

- *'be based upon existing use value*
- *allow for a premium to landowners (including equity resulting from those building their own homes)*
- *reflect the implications of abnormal costs; site-specific infrastructure costs; and professional site fees<sup>26</sup>*

5.29 This EUV+ approach is also acknowledged by the RICS in their recent guidance note in Assessing viability in planning under the NPPF:

*'[t]here is no standard amount for the premium and the setting of realistic policy requirements that satisfy the reasonable incentive test behind the setting of the premium is a very difficult judgement<sup>27</sup> The RICS guidance further explains that '[f]or a plan-making FVA, the EUV and the premium is likely to be the same for the same development typology, but it would be expected that a site that required higher costs to enable development would achieve a lower residual value. This should be taken account of in different site typologies at the plan-making stage.<sup>28</sup>*

5.30 For this study, we have assumed greenfield and brownfield scenarios for the small/medium sites and only greenfield scenarios for the urban extensions and new settlements.

5.31 For the greenfield scenarios we assume that the EUV is based on agricultural land values. Based on our evidence of land value comparables, we have adopted a £17,500 per gross acre (£43,242 per gross hectare). Premiums applied to agricultural land values have been typically regarded between x10 – x20 multipliers. This has been established through landowner agreements, various studies<sup>29</sup>, S106 viability negotiations and appeals. More recently we have seen evidence<sup>30</sup> of lower multipliers where sites have specific costs which reduces the land value further.

5.32 As a working assumption we have used x10 multiplier for the greenfield land value testing. Using a x10 multiplier results in a BLV of £175,000 per gross acre

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<sup>25</sup> MHCLG, 05 May 2019, PPG, Paragraph: 013 Reference ID: 10-013-20190509

<sup>26</sup> MHCLG, 09 May 2019, PPG, Paragraph: 014 Reference ID: 10-014-20190509

<sup>27</sup> RICS, March 2021 (effective from 01 July 2021), Assessing viability in planning under the National Planning Policy Framework 2019 for England, paragraph 5.3.3

<sup>28</sup> Ibid, paragraph 5.3.7

<sup>29</sup> HCA Area Wide Viability Model (Annex 1 Transparent Viability Assumptions)

<sup>30</sup> Land at Warburton Lane, Trafford (Appeal Ref: APP/Q4245/W/19/3243720) and Inspector's Post-Hearing Letter to North Essex Authorities

(£432,425 per gross hectare). As shown in the table below, this BLV falls in the range used in the other studies.

**Table 5.7 Greenfield land value comparison**

RBWM input 2019 (HDH)	CDC & SBDC input 2019 (DixonSearle)	Viability input used in WAGS testing
£175,000 per acre (£430,000 per ha) <sup>31</sup>	£100,000 - £250,000 per gross acre (£250,000 - £618,000 per gross ha) <sup>32</sup>	£175,000 per gross acre (£432,425 per gross hectare).

5.33 Brownfield land values have been based on an existing use value of £500,000 per gross acre (£1.235m per gross hectare), plus a 10% landowner premium. Our values are broadly in line with the other studies (see Table 5.8), although the Dixon Searle study is very unclear whether brownfield was tested, so we have used their commercial land figure as a reference point.

**Table 5.8 Brownfield land value comparison**

RBWM input 2019 (HDH)	CDC & SBDC input 2019 (DixonSearle)	Viability input used in WAGS testing
£535,000 per gross acre (£1.32m per gross ha)	Approx. £526,000 per gross acre (£1.3m per gross ha) for commercial land	£550,000 per gross acre (£1.36m per gross ha)

### Housing mix and affordable housing

5.34 When considering housing mix (market and affordable housing) we have drawn reference to the Local Housing Needs Assessment produced for RBWM, Slough and South Bucks produced by GL Hearn in 2019. The key findings of this study are in Table 5.9 **Error! Reference source not found..**

**Table 5.9 GL Hearn housing mix findings**

	1-bed	2-bed	3-bed	4+-bed
Market	0-5%	20-25%	50-55%	20-25%
Affordable home ownership	20-25%	40 -45%	25-30%	5-10%
Affordable housing (rented)	35-40%	25-30%	25-30%	5-10%

5.35 Based on the suggested range in Table 5.9 above, we have adopted the housing mix in Table 5.10 below . We have assumed that all 1 bed units come forward as flats and all 2 bed units come forward 50/50 flats and houses.

<sup>31</sup> Based on large green 500 dwelling scenario and west of Windsor strategic site

<sup>32</sup> Page 53 of the report states that 'The upper level noted here, at £250,000/ha applied to the gross site area, is the key level – our base assumption in respect of bulk greenfield land purchase on the EUV+ basis.'

**Table 5.10 Market and affordable housing mix adopted**

	1 bed	2 bed	3 bed	4 bed
Market	5%	20%	55%	20%
Affordable blended	20%	30%	30%	10%

5.36 In regard to the affordable housing tenure mixes, we have adopted the inputs in Table 5.11. We have assumed that affordable home ownership will be in the form of shared ownership tenures and we have also included First Homes. The minimum tenure mix for First Homes is 25% and the minimum discount from market value is 30%, this is reflected in our inputs.

**Table 5.11 Affordable housing tenure assumptions**

	Shared ownership	Affordable rent	First homes
% of tenure mix	25%	50%	25%
% of market discount	65%	45%	70%

5.37 Our initial appraisals will be tested at a 40% affordable housing requirement as this is the most common requirement sought by Councils (see Table 5.12). Our sensitivity analysis will demonstrate what impacts decreasing the affordable housing target will have on viability surpluses/deficits.

**Table 5.12 Councils' current affordable housing requirements for larger sites**

RBWM	Slough	CDC	SBDC
30% <sup>33</sup>	40% <sup>34</sup>	40% <sup>35</sup>	40% <sup>36</sup>

### Planning policy costs

5.38 Our initial appraisal results have been presented in a format that does not account for planning policies or any infrastructure costs. The only planning policy costs that we have included within our appraisals are those which are required in most Local Plans nationally. These are set out in the table below.

<sup>33</sup> Royal Borough of Windsor & Maidenhead, draft Local Plan, Policy HO 3 Affordable Housing

<sup>34</sup> Slough Borough Council, Nov 2008 updated Sept 2017, Developer Contributions and Affordable Housing (Section 106) Developer's Guide Part 2

<sup>35</sup> Chiltern District, adopted Nov 2011, Core Strategy Policy CS8: Affordable Housing Policy - 15 dwellings or more, at least 40% of dwelling

<sup>36</sup> South Bucks, adopted Feb 2011, Core Strategy Policy 3: Affordable Housing. Also recommended percentage in the new Local Plan viability testing



**Table 5.13 Planning policy costs included within appraisals**

Element	Cost	Comment
Affordable Housing	We have shown a range of results at differing levels of affordable housing (AH). This is to encourage opportunity cost decision making.	Calculated as on-site provision through reduced capital values on affordable housing tenure. Sensitivity testing is used to show the impact of varying the amount provided.
Biodiversity net gain	£988 per dwelling.	We have relied upon calculation set out in the Biodiversity Net Gain and Local Nature Recovery Strategies, 2019.
Water efficiency – limit water to 110 litres/person/day	£9 per dwelling.	The cost reflects limited water usage to 110 litres/person/day. Based Department of Communities and Local Government Housing Standards Review Cost Impact, September 2014 by EC Harris.
Air quality assessment	Included in professional fees.	As stated.
Travel plan	Included in professional fees.	As stated.
SuDs	Covered within external works.	Evidence ‘one the ground’ is showing that a holistic approach is being undertaken through the delivery of SuDs as part of external works.
Open space standards	The cost of the land is inclusive of the gross to net land calculation.	The cost of creating open space within the external works.
Future Homes Standard (interim uplift)	£4,847 per house (£2,256 per flat) – 31% reduction in CO2	Based on the Future Homes Standard consultation summary of responses, January 2021. The government have committed to a ‘Fabric plus technology’ interim uplift in Part L (conservation of fuel and power) and Part F (ventilation). Interim measures to take effect in June 2022 <sup>37</sup> .

<sup>37</sup> MHCLG, 2021, The Future Homes Standard: 2019 Consultation on changes to Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations for new dwellings. Summary of responses received and Government response, Table 4

- 5.39 Any additional planning policy costs that are not included in Table 5.13 will need to be considered as part of any development surplus which may be generated by our development appraisals.
- 5.40 From our previous work with other local authorities, we are aware additional policies may include housing accessibility M4(2), M4(3) renewable energy requirements, electric charge points and net zero carbon requirements an illustration of these costs is set out in Table 5.14 **Error! Reference source not found.** In addition, education (variable, dependent on the capacity of local schools) and contributions to local or community services.

**Table 5.14 Potential planning policy costs not included within appraisals**

Element	Cost	Comment
Housing accessibility (M4(2))	£1,400 per dwelling (average £420 per dwelling @ 30% of dwellings)	Cost is based on the DCLG Raising accessibility standards for new homes, consultation paper, September 2020, paragraph 45.  In most local authorities this policy usually requires 10% - 50% of dwellings to meet this standard (based on housing need), so the true cost per dwelling is lower.
Housing accessibility (M4(3))	£22,791 per dwelling (average £1,140 per dwelling @ 5% of dwellings)	Sourced as above.  In most local authorities this policy usually requires 5% - 10% of dwellings to meet this standard (based on housing need), so the true cost per dwelling is lower.
Electric charge points	£500 (per house) £2,500 (per every x4 flat)	Based on industry feedback from studies we are currently undertaking elsewhere (Swindon & Swale BC).
Zero regulated carbon (includes Future Homes Standard (FHS) costs)	£5,253 per house (the additional on top of the cost for FHS, £4,847 to reach zero regulated carbon, the full cost is £10,100 per house, but we have assumed that zero regulated carbon would meet the requirements of the FHS)	The cost to achieve zero regulated carbon by employing energy efficiency, on site carbon reduction and other allowable solutions (carbon offsetting).  Research by Currie & Brown for Centre for Sustainable Energy, December 2018. It is unknown at this stage how much of the zero carbon 'journey' will be achieved by the interim Future Homes Standards uplift and full Future Homes Standard implementation in 2025 (75% lower CO2 emissions than current standards). We assume that these measures would encompass the FHS charges included in Table 5.13. The cost of flats is lower, between £4,800 and £6,500 per flat. To avoid double counting we have removed the cost of FHS from this cost.

Education	£10,056 per dwelling	The cost is taken from RBWM SPD Planning Obligations and Developer Contributions 2014 – which indicates a cost per dwelling to build a two or three tier school of between £1,909 - £12,932. This cost depends on the number of bedrooms delivered. We have adopted the figure applicable to 3 bed dwellings. This is a conservative figure accounting for the age of the SPD and the likelihood of cost inflation since publication.
Total	£17,369 per dwelling	

### Infrastructure costs

5.41 In addition to the above, we need to consider strategic infrastructure. In assessing the strategic infrastructure requirements, we have referred to the Harman Report. The report outlines strategic infrastructure requirements to be between £17,000 - £23,000 per dwelling. Costs are in relation to unlocked sites for development, including; spine road, site servicing, site preparation etc. The Harman Report states:

*‘strategic infrastructure costs which are typically in the order of £17,000 - £23,000 per plot for larger scale schemes.’<sup>38</sup>*

5.42 Combining planning policy costs (£17,369 per dwelling) and strategic infrastructure costs of £23,000 per dwelling provides a total estimated cost of **£40,369 per dwelling**, to be absorbed through any development surplus generated.

### Where is development viable?

5.43 The results in Table 5.15 show that greenfield development is viable at 25% and 40% affordable housing across all greenfield scenarios. Brownfield viability is more challenging, with development becoming viable around 30% - 35% affordable housing. The reasons for this are:

- brownfield sites have higher site remediation costs.
- brownfield sites have a higher benchmark land value.

<sup>38</sup> Local Housing Delivery Group Chaired by Sir John Harman, 20 June 2012, Viability Testing Local Plans, Advice for planning practitioners, page 44

**Table 5.15 Appraisal surplus results**

Typology	Development surplus £ per dwelling			
	25% AH	30% AH	35% AH	40% AH
250 greenfield	£82,255	£76,045	£69,830	£63,607
250 brownfield	£15,973	£9,532	£3,090	-£3,352
500 greenfield	£80,779	£74,519	£68,250	£61,971
500 brownfield	£9,126	£2,722	-£3,683	-£10,087
1,000 dwellings	£70,702	£64,234	£57,752	£51,247
2,500 dwellings	£81,821	£75,422	£69,019	£62,612
5,000 dwellings	£80,357	£73,963	£67,567	£61,167
Small garden village: 3,000 dwellings	£79,613	£73,214	£66,812	£60,405
Large garden village: 5,000 dwellings	£78,173	£71,941	£65,708	£59,471
Garden town: 10,000 dwellings	£75,540	£69,318	£63,096	£56,872

### Sensitivity testing

- 5.44 We have identified differences in the housing market across the study area. According to the heatmap shown earlier (Figure 5.3), prices in central Slough are generally the lowest observed. Table 5.16 shows the same scenario results with a 10% reduction in sale values and Table 5.17 with a 20% reduction. We can see from this analysis a reduction in sale values has a significantly impact on the surpluses generated.

**Table 5.16 Appraisal surplus results – 10% reduction in sale values**

Development surplus £ per dwelling				
Typology	25% AH	30% AH	35% AH	40% AH
250 greenfield	£53,196	£47,889	£42,570	£37,234
250 brownfield	-£14,337	-£19,781	-£25,225	-£30,668
500 greenfield	£51,660	£46,292	£40,908	£35,500
500 brownfield	-£20,654	-£26,071	-£31,489	-£36,906
1,000 dwellings	£41,687	£36,103	£30,490	£24,843
2,500 dwellings	£53,426	£47,961	£42,489	£37,008
5,000 dwellings	£52,067	£46,609	£41,138	£35,651
Small garden village: 3,000 dwellings	£51,238	£45,775	£40,305	£34,826
Large garden village: 5,000 dwellings	£49,874	£44,583	£39,280	£33,961
Garden town: 10,000 dwellings	£47,358	£42,076	£36,790	£31,503

**Table 5.17 Appraisal surplus results – 20% reduction in sale values**

Development surplus £ per dwelling				
Typology	25% AH	30% AH	35% AH	40% AH
250 greenfield	£23,440	£18,994	£14,547	£10,101
250 brownfield	-£44,647	-£49,093	-£53,539	-£57,985
500 greenfield	£21,971	£17,541	£13,111	£8,681
500 brownfield	-£50,434	-£54,864	-£59,294	-£63,724
1,000 dwellings	£12,093	£7,433	£2,773	-£1,887
2,500 dwellings	£24,819	£20,265	£15,698	£11,130
5,000 dwellings	£23,555	£19,024	£14,493	£9,962
Small garden village: 3,000 dwellings	£22,668	£18,118	£13,560	£9,003
Large garden village: 5,000 dwellings	£21,371	£17,006	£12,641	£8,277
Garden town: 10,000 dwellings	£19,073	£14,736	£10,396	£6,057

### Where is development viable enough to make a meaningful contribution to any infrastructure costs?

- 5.45 Table 5.18 and Table 5.19 show the results of the surpluses previously generated but with the additional policy costs (£17,369 per dwelling) and infrastructure (£23,000 per dwelling). We have not shown a scenario with a 20% reduction in sale values, as the results show that development is unviable across all scenarios tested.
- 5.46 The infrastructure costs identified of £23,000 per dwelling are unlikely to cover the costs of significant large infrastructure such as a new junction onto a major A road or motorway, a by-pass or a railway station. These levels of costs will need to be met from any additional surpluses identified or other sources.
- 5.47 The results in Table 5.18 show that greenfield scenarios are viable with these additional costs across all levels of affordable housing tested. But when sales values fall by 10% (Table 5.19), then viability on greenfield sites becomes more challenging. In these scenarios, trade-offs will need to be considered between policy and infrastructure costs to maintain viable development.

**Table 5.18 Appraisal surplus results – with infrastructure and additional policy costs**

Typology	Development surplus £ per dwelling			
	25% AH	30% AH	35% AH	40% AH
250 greenfield	£41,886	£35,676	£29,461	£23,238
250 brownfield	-£24,396	-£30,837	-£37,279	-£43,721
500 greenfield	£40,410	£34,150	£27,881	£21,602
500 brownfield	-£31,243	-£37,647	-£44,052	-£50,456
1,000 dwellings	£30,333	£23,865	£17,383	£10,878
2,500 dwellings	£41,452	£35,053	£28,650	£22,243
5,000 dwellings	£39,988	£33,594	£27,198	£20,798
Small garden village: 3,000 dwellings	£39,244	£32,845	£26,443	£20,036
Large garden village: 5,000 dwellings	£37,804	£31,572	£25,339	£19,102
Garden town: 10,000 dwellings	£35,171	£28,949	£22,727	£16,503

**Table 5.19 Appraisal surplus results – 10% reduction in sale values**

Typology	Development surplus £ per dwelling			
	25% AH	30% AH	35% AH	40% AH
250 greenfield	£12,827	£7,520	£2,201	-£3,135
250 brownfield	-£54,706	-£60,150	-£65,594	-£71,037
500 greenfield	£11,291	£5,923	£539	-£4,869
500 brownfield	-£61,023	-£66,440	-£71,858	-£77,275
1,000 dwellings	£1,318	-£4,266	-£9,879	-£15,526
2,500 dwellings	£13,057	£7,592	£2,120	-£3,361
5,000 dwellings	£11,698	£6,240	£769	-£4,718
Small garden village: 3,000 dwellings	£10,869	£5,406	-£64	-£5,543
Large garden village: 5,000 dwellings	£9,505	£4,214	-£1,089	-£6,408
Garden town: 10,000 dwellings	£6,989	£1,707	-£3,579	-£8,866

## Industrial uses

5.48 In addition to assessing residential viability, we have also been asked to review employment viability, focussing on industrial (B2/B8) uses. Our work will provide insight in regards to the ability for these employment uses to fund infrastructure.

### The national market

5.49 Prior to the COVID-19 lockdown, the UK industrial market was tight, with growing demand pushing against restricted supply.

5.50 In the years before the recession caused by the global financial crisis, the industrial market saw a wave of speculative development, fuelled by easy access to finance. Much of the new space that resulted remained on the market as occupier demand weakened in the recession, so speculative development came to a halt. In more recent years supply has tightened against demand due to the economic recovery; the increase in online shopping (which needs warehouse space); and some industrial units being lost to higher-value residential uses.

5.51 Due to the tight nature of the funding markets, speculative development is generally only occurring in 'super-prime' areas such as parts of the M1 corridor, Heathrow, etc. Those areas have very strong occupier demand from blue-chip covenants, who are prepared to commit to longer-term leases (typically more than 10 years), therefore the perceived risk is low. Elsewhere, speculative development is generally occurring only for larger units that can be occupied by these large national /international firms.

- 5.52 The economics for small and mid-sized units is different from large-scale distribution units, both in terms of cost and values. Smaller and mid-sized units do not benefit from economies of scale for build costs as large units do. Covenant strength of occupiers of smaller units is generally weaker and result in less secure income, which is guaranteed for shorter periods due to shorter lease terms, and hence lower capital values. Consequently, small and medium-sized development typically occurs only on existing employment sites - where infrastructure is currently in place; or as part of larger strategic schemes, whereby the large-scale distribution units can pay for the infrastructure to service the smaller and medium-sized units.
- 5.53 Concerning small and mid-size units, the lack of speculative development has led to an imbalance in the market, with some occupiers having to wait for the build to suit opportunities, or taking second-hand space to satisfy immediate requirements although they would prefer new space. With a lack of suitable medium-sized space, occupiers across the country are struggling to find suitable space for business expansion. This is having a knock-on effect, with smaller units not experiencing 'natural' levels of market churn, therefore not freeing up space for SMEs and start-ups.
- 5.54 Since the coronavirus lockdown, the industrial market appears to be performing well. Demand for online retail has increased significantly and manufactures have sought to re-purpose space to respond to the government's need for protective equipment. As at Q1 2021, £2.7 billion of logistics/industrial property changed hands in the first 3 months of the year with overseas investors such as American private equity taking 65% of the transaction volume; demonstrating the current resilience of this part of the property industry.

### The local market

- 5.55 Demand for industrial space across the study area is strong and supply tight. Demand is strong because the area catches London overspill, access to Heathrow (the biggest freight handling airport in the UK), and M4 and M40 corridors (west/west link).
- 5.56 Due to competing pressure of land uses, predominantly higher value residential, and the strong demand, supply is tight this is highlighted through CoStar vacancy rates as follows:
- Slough: 7.4%
  - Windsor & Maidenhead: 2.5%
  - South Bucks: 0%
  - Chiltern: 0.4%

### Industrial leases

- 5.57 Rents for industrial across the study area are strong. As shown in Table 5.20, rents are typically the highest around Slough, where there has been new build stock delivered and is attractive for occupiers due to its proximity to central London and Heathrow. The data shows that rents for large warehouse units (i.e.



above 100k sqft) are around £15.25 psf, mid-box units (20 – 100k sqft) up to £17.50 psf and the smaller unit around £13.50 psf. But the many of the smaller units are older, refurbished stock and we would expect new build units to achieve a price premium. We also see long term tenancies being agreed between 10–25-years.

**Table 5.20 Relevant industrial & distribution rent transactions**

Sign date	Address	Tenant	Size sqft	£ psf	Comment
07/10/2019	Valor Industrial Park, Slough	SIG Trading Limited	134,085	15.25	New build unit, let on a 20 year lease
23/12/2018	158 Edinburgh Ave Slough	Emerson	75,590	£10.97	Built May 2017, 10 year lease
15/08/2019	700 Stirling Road, Slough	CyrusOne	50,761	£17.50	Built 2018, 25 year lease
15/09/2020	Hurricane Way, Slough	n/a	21,644	£13.00	n/a
13/01/2020	Hurricane Way, Slough	Hellman Worldwide Logistics	33,523	£13.00	10 years
26/04/2021	Yeovil Road, Slough	Signpost Diagnostics	5,863	£14.50	n/a
29/09/2020	Stirling Road, Slough	Alpha Scientific	7,094	£13.56	10 years
01/04/2019	Kings Grove, Maidenhead	n/a	3,586	£9.52	n/a
01/04/2020	Denmark Street, Maidenhead	CityFibre	2,794	£11.66	20 years
04/01/2021	Unit 1 Priors Way, Industrial Estate, Maidenhead	N/a	6,113	£12.50	Refurbished, 1980s unit
30/05/2020	Units 3 & 4, St Georges Trading Est, White Lion Road, Amersham	N/a	7,241	£13.50	Refurbished late 1908s unit
01/02/2018	Unit 12, St Georges Trading Est, White Lion Road, Amersham	N/a	3,180	£11.95	Refurbished late 1980s unit

### Industrial yields

5.58 Due to the strong demand for industrial across the study area combined blue chip covenants taking space on long term leases yields are low. Evidence (see Table

5.21) shows that units appear to often be traded in bulk i.e. entire trading estates tend to change hands between global investors. Achieved yields range between 3.89% and 5.5%. New stock with the most up to date specification or most favourable locations have the lower yields.

5.59 We have cross referenced our findings with Knight Frank yield guide<sup>39</sup>, which are broadly in line with expectations. Net initial yields as of January 2021 for prime distribution/warehousing (15-year income) are 4.00%.

**Table 5.21 Relevant industrial lease transactions**

Sale date	Address	Price paid	Size sqft	NIY	Comment
30/07/2020	Horton Road, Heathrow West	£2.85m	12,401	5.1%	Tenancy unknown, built 1992
30/11/2020	Lakeside Industrial Estate, Heathrow West	£17m	53,4430	4.75%	Vacant, built 1980
16/11/2020	Perth Trading Estate, Slough	£32.5m	135,000	4.34%	Entire trading estate sold
01/08/2018	1-3 Slough Interchange Industrial Estate, Slough	£10m	47,636	3.89%	Fully let at sale, built 2002
01/08/2018	Units 2-4 St Peter's Road, Maidenhead	£8.3m	47,334	5.5%	3 of 4 units let, residential potential
18/12/2020	Unit 1 Chess Business Park, Chesham	£2.45m	17,108	5.0%	Let to J & R Self-Storage Limited until October 2032.
01/11/2018	Fairacres Industrial Estate, Dedworth Road, Windsor	£2m	25,732	5.03%	Multi-let unit

### Industrial scenarios to test

5.60 Based on the above evidence we have tested the following scenarios:

- B8 distribution warehouse 10,000 sqm (107,640 sqft)
- Rent £161 psm (£14.00 psf)
- Yield 4.75%

B1c (now Class E)/B2 industrial warehouse 2,000 sqm (21,528 sqft)

<sup>39</sup> Knight Frank, 2021. Prime Yield Guide January 2021

- Rent £135 psm (£12.50 psf)
- Yield 5.25%

### Development costs

5.61 As with the residential viability assessment, we have reviewed the existing viability evidence base documents and where possible, and justifiable, have used the same inputs. Our review of the viability inputs is presented in Table 5.22.

**Table 5.22 Viability inputs, industrial**

Viability input	RBWM input 2017 (HDH)	CDC & SBDC input 2019 (DixonSearle)	Viability input used in WAGS testing	Comment/justification
Build costs	£842 psm – based on BCIS warehouses/stores re-based for RBW&M.	£1,118 psm based on BCIS Median re-based for the districts (includes office element)	For B1c (now Class E)/B2 - £824 psm for warehouses/stores up to 500 – 2,000 sqm. For B8 - £656 psm for warehouses/stores over 2,000 sqm Based on BCIS median quartile re-based to Slough.	Based on latest BCIS data appropriate source of information as set out in the PPG on viability.
External works allowance	Range between 5% and 20%.	Range between 5% and 20%.	Range between 5% and 20%.	Consistent with previous assessments.
Statutory planning fees (residential)	Based on the national formula.	Based on the national formula.	Based on the national formula.	Consistent with previous assessments.
Planning application professional fees, surveys and reports	Not included. A cost of £10,000 'pre planning' is included.	Not included.	Calculated as a three times multiplier to the national formula above.	This approach is considered reasonable.
Professional fees	8% of total build costs.	8% of build total costs.	8%-10% of total build costs.	This approach is considered reasonable.
Contingency	5% for brownfield sites and 2.5% for other sites.	5.0% of build costs.	5.0% of build costs.	Consistent with previous assessments and the high level nature of testing and

## Part 2: Potential Locations for Development

Viability input	RBWM input 2017 (HDH)	CDC & SBDC input 2019 (DixonSearle)	Viability input used in WAGS testing	Comment/ justification
				the potential unknowns.
Marketing and promotion	2.50% sales fee, no specific marketing fee.	1.00% of GDV.	1.00% of GDV.	Sourced from Harman report and comparable schemes. This approach is consistent with previous approaches.
Letting agents costs	10.0% rental value.	10.0% rental value.	10.0% rental value.	This approach is consistent with previous approaches.
Letting legal costs	Not included.	Not included.	5.0% rental value.	Based on industry norms and other schemes coming forward.
Profit	20.0% on GDV.	15.0% - 20.0% on GDV.	16.67% on GDV.	As per viability PPG. This approach is consistent with previous approaches.
Interest rate	6.0% with no equity for developers.	6% (including over lead-in and letting / sales period) inclusive of fees	7.0% with no equity for developers, inclusive of fees.	This approach is consistent with the residential assessment.
SDLT on land value	As per HMRC effective rate.	As per HMRC effective rate.	As per HMRC effective rate.	This approach is consistent with previous approaches.
Agents fee on land value	Legals and acquisition 1.5%.	1.5% of land value.	1.0% of land value.	This approach is consistent

Viability input	RBWM input 2017 (HDH)	CDC & SBDC input 2019 (DixonSearle)	Viability input used in WAGS testing	Comment/ justification
				with previous approaches.
Legal fee on land value	Included within above.	0.75% of land value.	0.5% of land value.	This approach is consistent with previous approaches.

### Non-residential timescales

5.62 Table 5.23 sets out the timescales used in the industrial testing appraisals. It is assumed the investments of the completed schemes are sold on build complete of the units.

**Table 5.23 Industrial timescales**

Scenario	GIA sqm	Lead in period	Development period
B1c (now Class E) /B2	1,000	12 months	12 months
B8	10,000	12 months	18 months

### Benchmark land value

5.63 In our testing we used the same BLV as the residential testing, as have assumed that employment development would only come forward as part of the greenfield scenarios. Therefore, a BLV of £175,000 per gross acre (£432,425 per gross hectare) has been used in this testing.

### Is industrial development viable?

5.64 Our results in Table 5.24 show development surpluses, both as the residual and on a per hectare. Our results show that based on our inputs, both B1c (now Class E), B2 and B8 are viable, with surpluses to fund infrastructure.

**Table 5.24 Industrial surplus results**

Scenario	GIA sqm	Development surplus	Development surplus per ha
B1c (now Class E) /B2	2,000	£1,160,805	£2,321,611
B8	10,000	£12,546,049	£5,018,420

## Conclusion

5.65 Our testing clearly demonstrates that it is credible and realistic to assume that housing development on strategic greenfield sites can generally cover its

- development costs and fund site specific infrastructure, policy requirements (including 40% affordable housing) and development obligations.
- 5.66 On large-scale developments, major changes may be needed to the strategic highways network – including, for example new access onto the M4 or a 'hypothetical' new road route running south of the borough to connect Jealott's Hill to Maidenhead via strategic development in the south the RBWM area. Such strategic infrastructure works are over and above the infrastructure costs of £23,000 per dwelling allowed for in the appraisal. They would need to be funded via the development surplus or external funding.
- 5.67 Our assessment has shown that surpluses of around £60,000 per dwelling or £300m for a 5,000-unit scheme, to fund strategic infrastructure or additional policy costs generated. These surpluses could allow for some level of contributions towards strategic highways works.
- 5.68 We consider that there is a risk that new build homes in Slough, even similar in style and layout to schemes delivered elsewhere in the area (i.e. policy compliant greenfield family housing at 35 dpa) may still attract a price discount than that used in the testing. We noted in Stage 1 of this work that wages and earnings are lower in Slough and so this may also suggest lower overall sales values as developers need to price schemes to match the local market in Slough.
- 5.69 We have sensitivity tested a 10% and 20% reduction in sales values across all typologies to reflect potential values across Slough. In these scenarios development surpluses fall and become negative. It is important to reiterate that under this sensitivity analysis, development surpluses become negative subject to the policy cost and infrastructure costs that we have assumed. This suggests that new development in Slough and strategic schemes can come forward, but may not be accompanied by a full package of policies or infrastructure and there may be less scope for development to pay for strategic infrastructure. We would recommend the Councils take a flexible approach to policy in these areas – where greenfield development is largely untested at scale.
- 5.70 Brownfield housing development struggles to be viable, regardless of sensitivity testing the inputs. This is due to the abnormal costs of developing these sites and the high existing use values.
- 5.71 We would also consider major remediation of landfill sites to be abnormal and relocating or rerouting major utility infrastructure. In most of the area we have looked at, such development is unviable unless affordable housing is reduced. Where affordable housing is around 30%, surpluses of up £9,000 per unit surplus is generated. But there is a risk that if new development around Slough cannot achieve robust values – similar to the wider market area – then viability becomes an issue.
- 5.72 Industrial development is viable, especially around Slough, which generates the higher values across the study area. Large-scale distribution is particularly viable and will be able to make contributions towards strategic infrastructure.

## 6 Spatial options

### Introduction

- 6.1 In this chapter, we identify possible spatial options for meeting the core area's housing supply shortfall. In Chapter 2 above we estimated that shortfall, or unmet need, over the study period 2019-39, as 13,500 homes. Of this total, as discussed earlier (para 2.14), 4,300 homes relate to the former South Bucks district, and in line with national policy should be provided in the first instance in an appropriate and sustainable location in the new Buckinghamshire Unitary Authority.
- 6.2 This leaves a shortfall of 9,200 homes to RBWM and Slough – of which 6,800 relate to Slough. This is the need we aim to accommodate in formulating spatial options below (there is no suggestion at the moment that Buckinghamshire shall accommodate any of that unmet need, although in line with the NPPF they need to assess the ability to meet any unmet need established from Berkshire authorities and consider whether this meets the test of 'exceptional circumstances' in the NPPF for Green Belt Release).
- 6.3 Our site assessment in Chapter 4 has identified a 'portfolio' of 16 sites, providing around 2,200 ha of land, with a theoretical capacity for 38,000 new homes – although of this total 85ha (1,900 homes) are in local authorities outside the core area, who will likely have their own supply shortfalls when they review their plans.
- 6.4 In line with our brief, it is not for this report to recommend a development scenario or even a preferred spatial option. Rather, our task is to show what may be possible, given the findings of our work to date. It will always be the case that the Councils, and ultimately elected Members (and their communities) will make the decisions. Also, in any event, significant further work will be needed to understand the full range of site specific constraints for each parcel.
- 6.5 There are obviously many different combinations of the 16 sites we have identified. The options we have formulated are not the only possible options. In developing those options, we have first considered a solution that involves as few development locations as possible. We have then turned to more dispersed options, which provide more land closer to Slough, where most of the need arises.
- 6.6 The argument in favour of large sites is that they can be developed as new-generation garden communities, meeting their social infrastructure needs on-site, with minimum impact on existing settlements. They can also efficiently capture land values to pay for large-scale, complex, costly infrastructure projects. Large sites and new communities have a long lead in times, but they provide scope for comprehensive planning and place-making to be put into place from the outset.
- 6.7 Large sites also carry risks. Obviously 'all eggs in one basket' is a concern. A number of Councils have seen their whole development strategy fail where it was overly reliant on one site, and detailed evidence showed the site would struggle

to deliver. Large sites also take time to plan and deliver. The impact of urbanising a large part of open countryside should not be under-estimated.

- 6.8 By contrast, smaller sites are generally delivered as urban extensions, rather than new communities. They are generally less able to accommodate the full range of infrastructure on-site, and have a greater impact on existing communities.
- 6.9 The distinction between large and small sites is obviously not clear-cut. There are examples of garden towns which are effectively collections of small sites, such as Taunton Garden Town. But the distinction is useful in the present context, as it helps us define spatial options.
- 6.10 Below, we develop alternative spatial options for accommodating the unmet need of the core area. We consider in turn options concentrating development at one, two or three locations. Finally we look at a 'business as usual' option, showing dispersed development across many smaller sites. We call the third option 'business as usual' because it broadly reflects past patterns of development.
- 6.11 The viability analysis in Chapter 5 has shown that development on strategic greenfield sites can generally cover development costs, site-specific infrastructure and policy requirements including 40% affordable housing, and make a meaningful contribution towards strategic infrastructure costs. For our study area, the main practical constraint on development is strategic transport infrastructure. Therefore, in considering alternative options below we focus on identifying sustainable transport solutions.

## Option A: One location

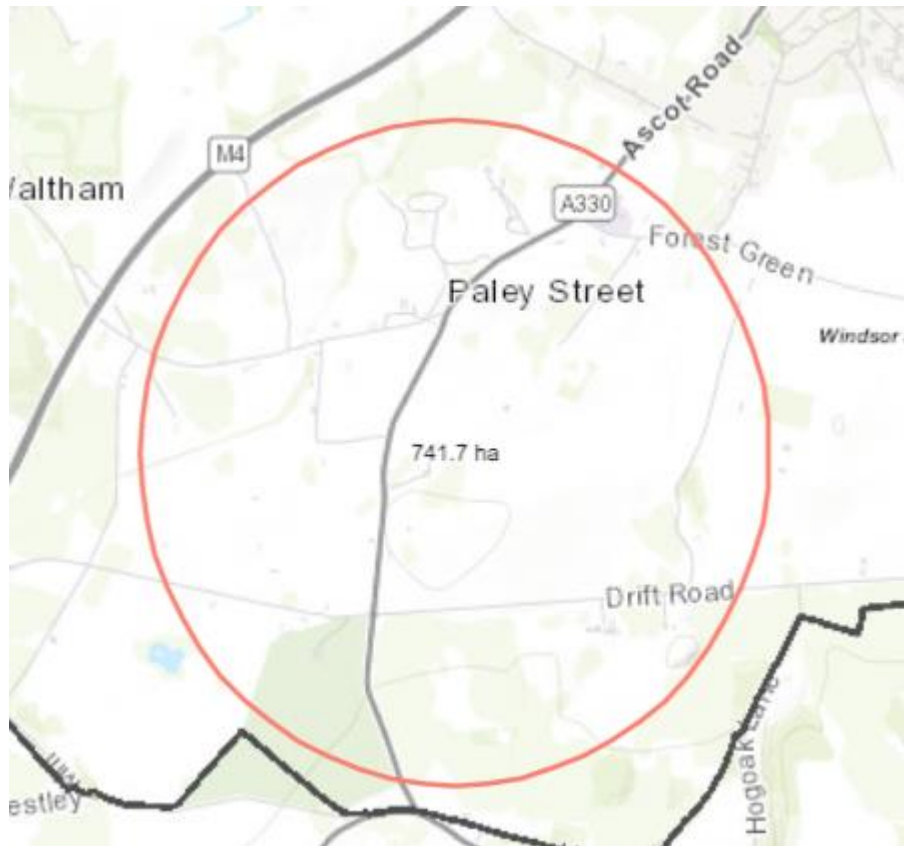
### The site

- 6.12 There is one possible site that, in terms of numbers, could accommodate the unmet housing need of Slough and RBWM. That land is identified in Chapter 4 as site WM007, Paley St. Our earlier analysis (see Figure 4.1 and Table 4.4) estimates that 741 ha may be suitable for housing development there, providing 10,400 dwellings. Other than the Green Belt, the site is free of policy constraints. But access to it is poor and it is not well related to existing social infrastructure. Any major development here would likely come forward as a new community, which provides its own social infrastructure on site.
- 6.13 This area is close to the proposed Jealott's Hill garden village, which is just to the South in Bracknell Forest, approximately on the border with RBWM. Jealott's Hill is proposed for allocation of around 2,000 dwellings and employment in the emerging Bracknell Forest Local Plan, but the plan has not yet been examined.
- 6.14 The new community proposal at Jealott's Hill suggests that a new community may also be feasible at Paley St. But for Paley St the Jealott's Hill proposal could be both an opportunity and a threat. We understand that poor access is a factor limiting the size of the current proposal and so, for Paley Street, there is a risk this proposed allocation reduces or erodes any headroom capacity.



- 6.15 A major drawback of WM007 is that it is remote from Slough, where most of the unmet housing need arises. As discussed in WAGS part 1 and illustrated in Figure 1.1 above, new housing there may be too expensive for people who would otherwise want to live in Slough, and not accessible to those people's families, friends and jobs. The next section considers the access issue in more detail.

**Figure 6.1 WM007 Paley St**



### Is development deliverable?

- 6.16 This option relies upon one single location for growth. Whilst the location has physical capacity for circa 10,000 dwellings, at present there is little transport infrastructure in place with little provision for cycling, only a low frequency longer-distance rural bus service (hourly), a rural local road network with limitations and little social infrastructure. The site is fairly remote from larger towns of Bracknell to the south, Windsor to the east and Maidenhead to the north.
- 6.17 This option relies upon the delivery of significant transport infrastructure to serve the new development, particularly give the limitations of present infrastructure. As well as roads, there would be a need to improve the bus service, which is likely to require significant pump priming to achieve improved frequency services.
- 6.18 The delivery of this option would require a new southern arm to Junction 8/9 of the M4 and a strategic road link from J8/9 to serve the growth area. A new access from the M4 is considered to meet the policy requirements of circular 02/2013 paragraph 39 below:

*'Where appropriate, proposals for the creation of new junctions or direct means of access may be identified and developed at the Plan-making stage in circumstances where it can be established that such new infrastructure is essential for the delivery of strategic planned growth.'*

- 6.19 The route from J8/9 to the growth area would be in the order of 3.5km in length and could route parallel to the M4, possibly serving employment uses closer to J8/9. This new infrastructure is likely to be feasible and deliverable, and large-scale development will only be possible if it is in place. There are examples of similar access solutions nearby in Berkshire. In nearby Shinfield, the Shinfield Eastern Relief Road included a new bridge across M4, significant works at the A327/B3270 Blackboy junction and a new 2km relief road which was opened in late 2017. This infrastructure serves 3,000 new homes and the Thames Valley Science Park. Further south on the A327 in Wokingham the Arborfield Cross relief road opened in November 2020 which is a new 2.3km length relief road and is associated with approximately 3,500 new homes to be built at the former Arborfield Garrison.
- 6.20 Both of these examples demonstrate that such infrastructure is deliverable in association with a strategic scale of development.
- 6.21 This development option assumes a much greater level of growth in one location than the case at Shinfield or Arborfield (albeit without as much existing population). The 10,000 homes may require the link road to the M4 J8/9 to be dual rather than single carriageway and the scale of growth is likely to mean significant upgrades of the A3095 and A330 to the south, as well as substantial investment in new and improved bus services.
- 6.22 The provision of infrastructure will mean a significant timescale and cost risk, if relying upon a strategy centred around one area of growth.

### **Is the option sustainable in transport terms?**

- 6.23 As discussed earlier at para 2.14, around three quarters of the housing that our development options aim to accommodate relates to the housing needs of Slough. But the Paley St site has a very poor relationship to Slough, which is over 16 km (10 miles) away and linked to it by only an hourly direct bus service (to Wexham Park Hospital rather than the town centre).
- 6.24 The distance, nature of the routes and severance of the M4 between Slough and the site are unlikely to result in much opportunity or likelihood of cycling.
- 6.25 In terms of public transport, the lack of a railway station, the lack of direct bus services and low frequency of existing buses are issues. Whilst bus services could be improved and extended to connect directly to Slough town centre, these services would operate over a long distance, with much of the route not serving significant existing population. Therefore new, extended or improved services will require pump-priming from early development, and the achievable frequency of services will not be very high.

- 6.26 Bus services linked to Maidenhead and / or Bracknell are more likely to be deliverable, and these could be influenced by other planned growth such as at Maidenhead Golf Course and Jealott's Hill. The proposed development at Jealott's Hill to the south could provide further provision of buses and improve the viability of services if served on the way south to Bracknell.
- 6.27 To sum up, in terms of serving Slough, the single-site option of a new community south of Maidenhead would lead to a car-dominated solution, with limited opportunity for cycling or public transport. In this context it is important to remember that some of the earlier work in this study looked at sites along the M40 corridor which were discounted in part for very similar reasons of poor accessibility to Slough Borough.
- 6.28 As well as access to Slough, other concerns are the relative lack of existing infrastructure and services and the remoteness of the location. This will result in a need to build a community largely from scratch. While similar concerns may apply with to other growth options, it is important to note that Paley St is more remote than other sites from existing amenities and facilities (schools, railway stations, etc).

### Summary

- 6.29 A one-site option has two main advantages: it is an opportunity to create a comprehensively planned new community, and it would not impact adversely on existing settlements. In our study area there is only one location that could accommodate development on the scale required – the Paley St site south of Maidenhead.
- 6.30 This site has a very poor geographical relationship to Slough which accounts for most of the housing need it would meet. New homes there may be too expensive for people who would normally live in Slough, and too inaccessible to places those people need to go to. Therefore it is not the right location to achieve a sustainable solution.
- 6.31 Also, the existing transport infrastructure and services are very limited for a 10,000 home new community. There is no station or railway line, rural bus services are severely limited, existing roads are not suitable and there is limited prospect of cycling to nearby towns.
- 6.32 There is potential to deliver a new access from the M4 at J8/9 to serve the area via a new road parallel to the M4. This is considered deliverable and would meet the policy tests of Circular 02/2013 by serving strategic growth.
- 6.33 This solution would lead to a largely car-led solution to the growth.
- 6.34 Development at Paley St would be very reliant upon the delivery of large-scale, complex infrastructure in a timely fashion; and to develop a whole community from scratch of 10,000 homes would require huge political will and focus on implementation and delivery. Due to these factors, the one-site option has significant delivery risks.

6.35 For this work we have highlighted a single site scenario but we need to caution that it may not be pragmatic, including from a market absorbing angle, to deliver all the area's future housing need on a single site. But at the same time the industry, with government, is looking to increase the pace of delivery above historic delivery rates. So we cannot simply conclude that a single site scenario should be discounted because the industry cannot deliver at pace.

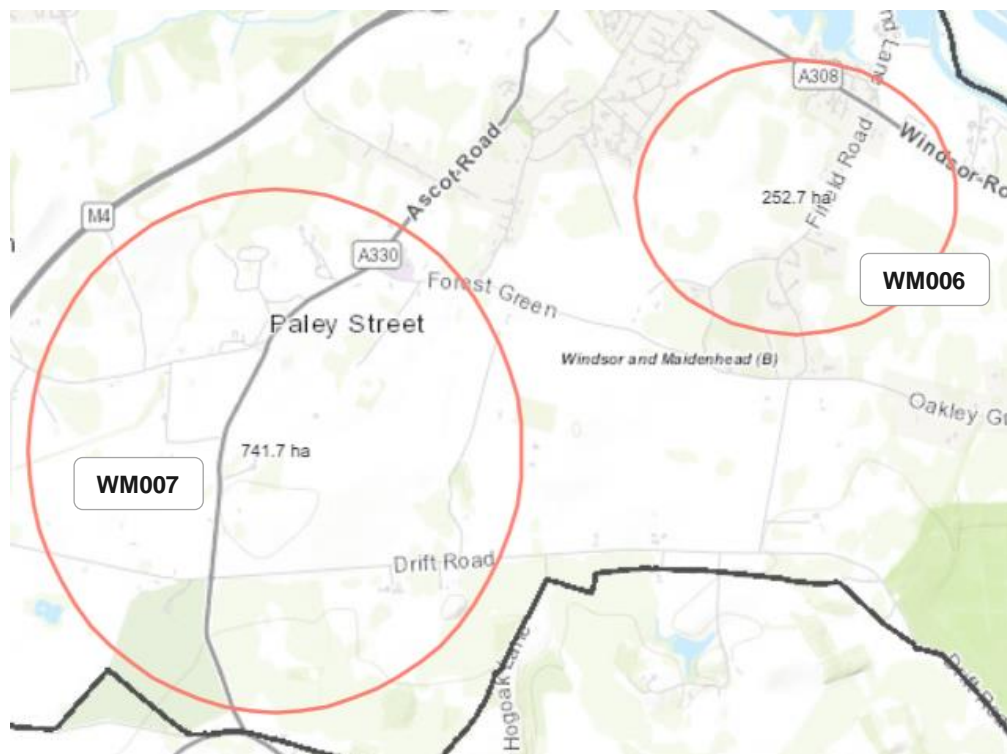
## Option B: Two locations

### The sites

6.36 As discussed above, one major drawback of the one-site option is that the only site that is large enough is remote from Slough. To overcome this issue, we have developed a two-location option.

6.37 In the RBWM area there are only two sites large enough to jointly accommodate the full scale of the unmet need: WM007 Paley St (10,400 homes) and WM006 East of Holyport (4,500 homes). The sites are mapped in Figure 6.2. To cover the estimated unmet need of 9,200 homes only part of each site would be required.

**Figure 6.2 WM007 Paley St and WM006 East of Holyport**

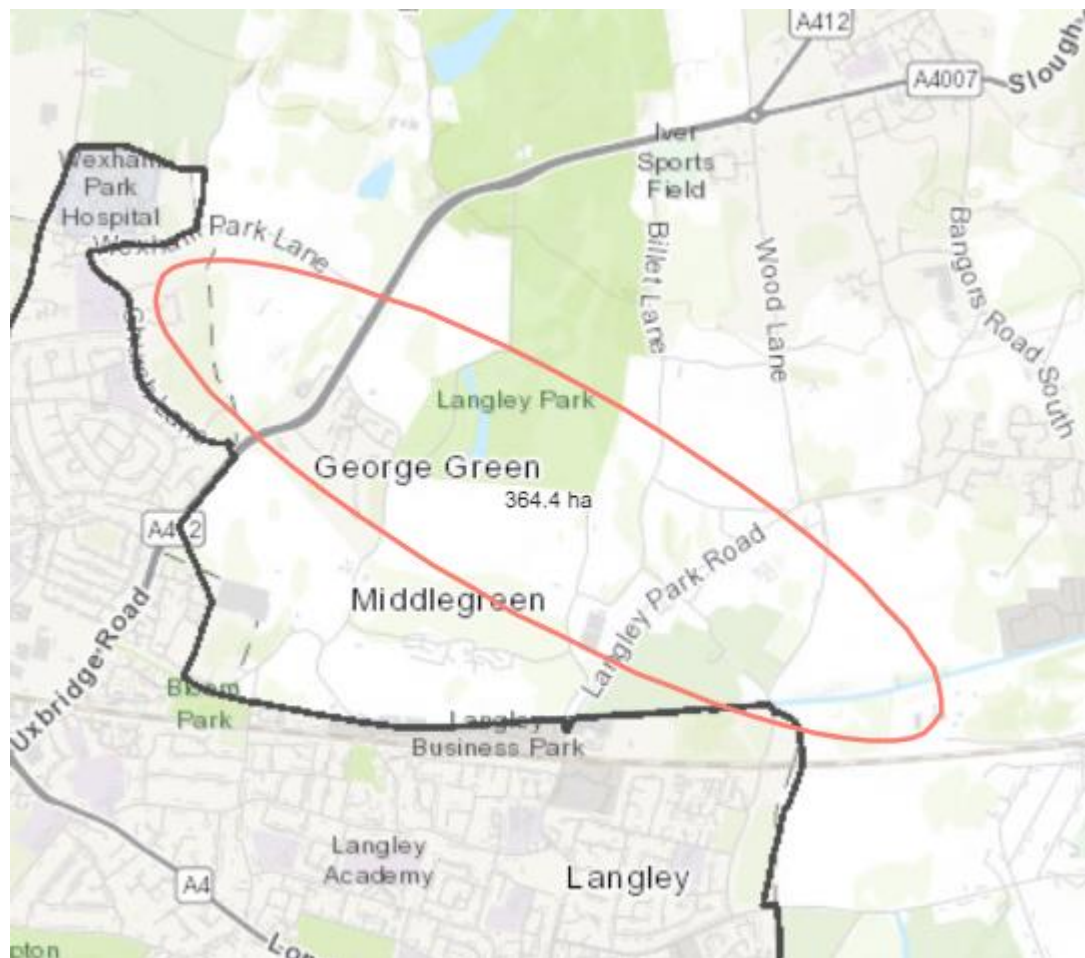


6.38 A two-location option using these two sites has major drawbacks. Like the one-location option discussed earlier, it would put new homes too far from Slough, where most of the unmet need arises. In any event, the option may not be deliverable, because if the number of homes delivered at Paley Street is too much below the site's full capacity the development may not have the critical mass to secure the necessary transport infrastructure. As discussed elsewhere, any development in this area needs a 'big bang' solution to make it accessible to

Maidenhead – not only in terms of highways (i.e. a new route to the M4) but also public transport - which would need significant critical mass to improve any routes through this area.

- 6.39 In the Slough area, of the sites we identified earlier only North East Slough (SB001) has the capacity to be part of a two-location option. In Chapter 4 we estimated that SB001 can deliver 5,800 homes. Slough Council previously developed masterplans for a similar area showing a capacity between 5,000–10,000 homes. Our 5,800 number is at the lower end of this range. We consider that this lower number is a better match to the needs of Slough, which are for lower-density family housing. Such housing is needed to balance the earlier urban supply in the borough, which has not delivered family units.
- 6.40 A two-location option that does address the needs of Slough would divide development between WM007 Paley St and SB001 North East of Slough. We assess the merits of this option below.

**Figure 6.3 SB001 North east of Slough**



### Is development deliverable?

- 6.41 Unlocking the development potential of North East of Slough (SB001) is dependent on achieving a new access route from the A4, around and through the development to the A412. The challenges of delivering this route include crossing

the M4 motorway, crossing the Great Western Mainline railway and crossing the Grand Union Canal. All these are significant elements of infrastructure, but none of them is technically undeliverable. There have been a number of new / replacement bridge crossings of the M4 delivered as part of the SMART motorway development and a new road bridge across the Great Western Mainline was delivered in 2015 at the Slough Trading Estate. Each of these structures will result in a significant cost and could also attract significant commuted sums for future maintenance. The M4 and railway crossings will mean that there will be limited time periods when such new infrastructure can be delivered, to minimise the impact on the railway and motorway.

- 6.42 There is a further risk relating to the railway crossing, in terms of the need to secure the air rights to deliver this infrastructure. This would need to be undertaken with Network Rail / Great British Railways (GBR). In the past such air rights have sought to secure a proportion of the value of the development that is unlocked by the new infrastructure. Whether this will continue to be the case with the changes in the rail industry and what role the local authority (Buckinghamshire Council) can play in negotiating this will be important.
- 6.43 Without all of these three new crossings the development potential would be significantly diminished or compromised.
- 6.44 The North East of Slough site is close to Slough town, enabling cycling and local bus services to be delivered and building upon and improving existing networks. In addition, much of the site is in close proximity to Langley station, providing options for rail travel over longer distance.
- 6.45 This development option would result in a scaled back level of strategic growth at WM007, south of Maidenhead. This could still be served from a new access and link road from J8/9, as described in Option A above. The level of development that would be provided is still considered to meet the circular 02/2013 tests in terms of being strategic in nature. The costs of the transport infrastructure needed to unlock the growth area are broadly unchanged from the one-location option, and the ability to deliver this may favour a more northerly location within the growth area rather than one further south to minimise the costs involved. There would remain a need for improved or new bus services (possibly more centred on Maidenhead and/or Bracknell). As in Option A, this is locating development growth remote from existing facilities and without much existing infrastructure. A reduced scale of growth is likely to mean that elements of social infrastructure such as a new secondary school may not be needed, although these may need to be considered in the context of other growth such as that planned at Jealott's Hill.
- 6.46 Under this option, we consider that the growth south of Maidenhead would remain at a level that is likely to be able to cover the cost of infrastructure.

#### Is the option sustainable in transport terms?

- 6.47 This option has the inherent advantage of delivering a good proportion of housing growth close to Slough, where it is needed. Development at SB001, North East of

Slough, would be within walking / cycling distance and a local bus ride of Slough town. The location would also benefit from the access to Langley railway station. The eastern side of Slough is close to Heathrow Airport, which is a major employment destination and could also be served by bus.

- 6.48 In this option, WM007 would be retained as a strategic growth area. While this site is closer to the M4 and more remote to nearby towns, it could be served by new or enhanced bus services linking to Maidenhead and / or Bracknell. This growth could be viewed alongside other growth such as that at Jealott's Hill to the south and Maidenhead Golf Club to the north in terms of bus solutions.

### Summary

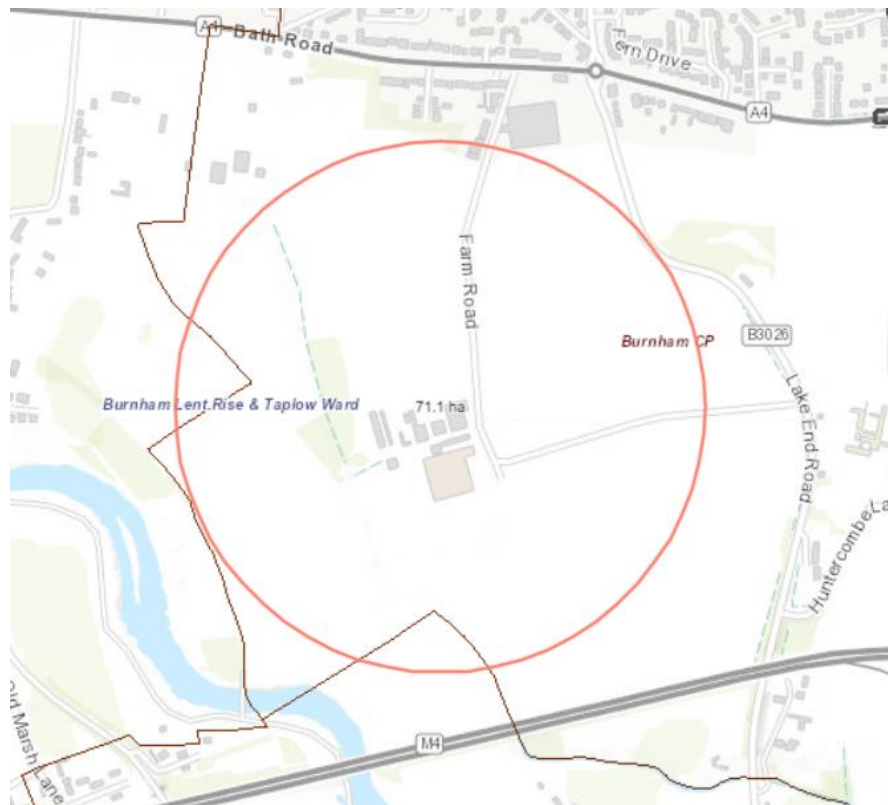
- 6.49 This option provides a sustainability advantage of delivering a significant proportion of the growth in close proximity to Slough, providing a much more sustainable option for growth in that regard and benefitting from the locational advantages to maximise walking, cycling and public transport to jobs, facilities and amenities in the Borough. The location also benefits from access to the railway at Langley station and proximity to Heathrow and employment growth.
- 6.50 The south of Maidenhead growth would be retained at a strategic scale but focussed less on connections to Slough but instead connections to Windsor / Maidenhead and Bracknell. There is a need for the site to be retained at a strategic scale and the location of the growth may be more northerly to reduce infrastructure burden. This growth may also be considered in the context of growth nearby, such as at the Maidenhead Golf Club and at Jealott's Hill.
- 6.51 There are significant elements of infrastructure required for this option. North East Slough (SB001) requires a new route from the A4 and crossings of the M4 motorway, Great Western Mainline and Grand Union Canal whilst the South of Maidenhead growth area relies upon a new access from J8/9 of the M4.

## Option B variant: three locations

### The sites

- 6.52 In this variant we retain SB001 North East of Slough and WM007 Paley St as development locations, but add SB008 West of Slough.

**Figure 6.4 SB008 West of Slough**



- 6.53 In relation to transport infrastructure, requirements at North East Slough remain as discussed above.
- 6.54 This option adds a further location for growth south of the A4, to the west of Slough. Like North East of Slough, this has good accessibility in terms of walking and cycling, bus provision and proximity to stations (Langley in east and Taplow in the west). It is also less reliant on new transport infrastructure, and therefore more deliverable, which would complement and reduce the pressure of delivery on North East Slough. SB008 is also readily accessible to local jobs at the Slough Trading Estate, retail on the A4, and Taplow station. The site is deliverable and well related to the edge of Slough. There may be opportunities to deliver elements of the wider Borough Transport Strategy such as P&R close to J7 of the M4 in tandem with the development of the site.
- 6.55 Growth north-east and west of Slough would be better matched to the qualitative profile of Slough's housing need, as it would deliver more affordable homes, and more certainty that lower-density housing will be provided, suitable for families.
- 6.56 This option would reduce the proportion of the growth met south of Maidenhead to around 3,000 homes. There will be similar issues to option B around infrastructure delivery and public transport.
- 6.57 If the scale of development at south of Maidenhead were to reduce more substantially (with more growth located both east and west of Slough), then an option may be to replace the location of the growth from WM007 Paley St to WM008 Holyport, which would have access via the A308 and existing highway network. However, the scope for this to be accompanied by improvements to the



A308 is very limited by the constraints of existing development on both sides of the road.

- 6.58 If retained as a larger strategic growth area (circa 3,000) then this will favour development served directly from J8/9 and via a new link road, potentially also enabling a strategic employment site. If the scale reduced down further (to circa 1,000) then this would be unlikely to meet the Circular 02/2013 test in terms of being strategic and is more likely therefore to be served from the existing roads, which could be either be the A330 if WM007 Paley Street or A308 if WM006 Holyport.

### Is the option sustainable in transport terms?

- 6.59 This option would ensure the delivery of more growth close to Slough and reduce the risk of infrastructure requirements holding up delivery. This option brings opportunities for more sustainable travel, including active travel and local bus services. The sites chosen are well located to access existing and proposed jobs as well as local facilities and amenities. Both sites are also close to railway stations. The west of Slough site is also close to existing employment at the Slough Trading Estate.
- 6.60 The growth at the Royal Borough of Windsor and Maidenhead could be scaled back from option B. If the quantum of development remains strategic, then access would be as in option B, via J8/9 and a new link road. If the scale of development were reduced more significantly, highway solutions could be based on the existing A330 (Paley Street) or A308 corridors (east of Holyport). Such solutions may be more related to connecting to the west of Windsor and Maidenhead. If this growth area is scaled back too far, it will not be able to deliver (in either a financial or policy compliance sense) a new direct access from J8/9.
- 6.61 There are delivery challenges with the North East Slough site, as discussed in Option B above. Identifying a further growth area west of Slough in addition may mean there is less dependency on North East Slough as regards the delivery of housing and the new motorway / railway / canal crossings, which may be welcome.

### Summary

- 6.62 This option identifies further growth close to Slough and reduces the dependency of housing delivery on new infrastructure. The additional growth close to Slough is well located to encourage alternatives to the car and be sustainable. The growth also benefits from existing infrastructure including the railway stations close by.
- 6.63 Including a further site adjacent to Slough reduces the dependency on timely delivery of infrastructure and provides housing located to take advantage of the accessibility to jobs and local amenities.
- 6.64 The increased delivery at Slough may reduce the scale of the South of Maidenhead as a growth area. If the quantum of development there remains at some 3,000 homes or more, those proposals would still be strategic, and likely to

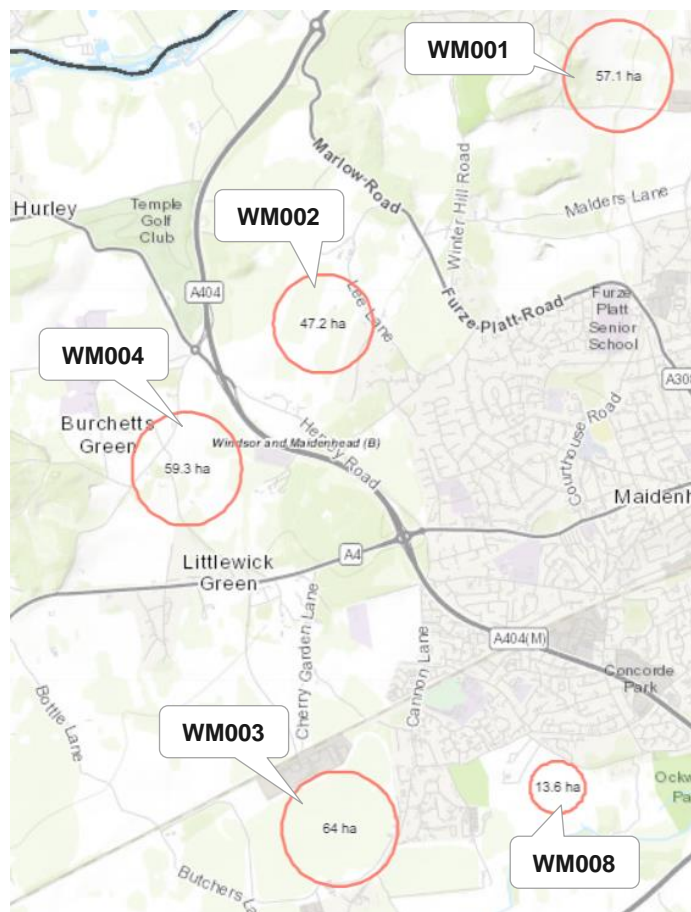
deliver access from the M4. If however, the scale was reduced significantly, then this would be unlikely to meet the policy requirement of being strategic, or to afford such access infrastructure. In that case, development would use the existing A330 or A308.

- 6.65 Flood risk is also a factor potentially limiting developable land, with areas of Flood Zones 2 and 3 in the WM007 Paley Street parcel. SB008 West of Slough also contains areas of Flood Zone 2 and 3 towards Jubilee River in the south-east.

### Option C: Business as usual

- 6.66 We describe the third possible option as ‘business as usual’, because it relies on further smaller, but still strategic, developments to accommodate the area’s unmet need. This scenario does not dramatically shift the historical spatial strategy of focusing new development in or around the main established towns.
- 6.67 In RBWM, this would mean releasing for development at least two of the smaller development locations we have assessed. Depending on the final capacity of the parcels, three parcels may be required.
- 6.68 These possible development locations are mapped in Figure 6.5. If three of these are taken forward, large parts of Maidenhead will be wrapped in new development – broadly west and north of the town.

**Figure 6.5 Smaller sites in RBWM**



- 6.69 Development here would be in the region of 1,000-1,300 homes per site. It is likely to require major works and investment to the A404 and related routes. Infrastructure serving the different sites would need to be planned comprehensively, through a strategy that covers large parts of the town. As it would not be possible to meet all infrastructure needs on site, investment would be required in existing settlements. This could benefit existing communities as well as new residents, but would need to be carefully planned.
- 6.70 Around Slough, if we leave out areas to the north of the town options are limited to smaller development areas north and north-west of the town. This area is more constrained, with individual parcels having small capacity.

**Figure 6.6 Smaller sites around Slough**



- 6.71 The depth of potential development north of Slough is much more limited – resulting in a longer development edge to the town overall. Compared to concentrating development in one urban extension, the number of existing communities in and around Slough that may be affected by development is likely to be greater. Another disadvantage of this option is that the area is relatively remote from Heathrow, where many Slough residents work, and from West London, where many people move to Slough from.

#### Is the option deliverable?

- 6.72 This option spreads development among several relatively small peripheral sites, which do not require, and/or cannot deliver, strategic infrastructure. Therefore the option instead relies more squarely on existing infrastructure provision. Cumulatively, the new development is likely to put pressure on that existing infrastructure, so neither the existing population of new residents are well served.
- 6.73 Many of the sites have direct access to suitable highways and are located close to existing bus services. Those on the edge of Maidenhead are close to facilities such as schools.
- 6.74 There are a number of possible permutations of these smaller sites. Development at these sites are likely to be deliverable, either as urban extensions or more

separate growth areas. Development of the sites is neither dependent on, nor likely to deliver, significant new transport infrastructure.

### Is the option sustainable in transport terms?

- 6.75 This option results in a variety of smaller sites coming forward. The balance of where these are and how much each delivers is uncertain. Some are more sustainable than others. But overall, a ‘business as usual’ strategy could lead to less sustainable solutions.
- 6.76 For many sites around Slough, development potential is limited by the local highway network and severance of the Great Western Mainline. At other sites, all means of access by all modes would use already congested routes, such as the A355, which is already struggling to accommodate existing travel demand and is subject to potential air quality issues.
- 6.77 This growth option will not deliver strategic infrastructure investment. Rather, it will rely to some degree on ‘spreading the pain’ of development. Considered individually, some of the sites in this option may be well served by transport infrastructure. But overall, this option would result in more congested and less sustainable transport than other options. In particular, it would produce difficult and compromised transport solutions in Slough, due to the severance of the Western Main Line.

### Summary

- 6.78 Under this option, the scale of housing development in each location would be too small to support the significant investments that other options would deliver, either for transport or social infrastructure. Examples include new bus services, M4 J8/9 access and access routes around Slough. The likely result is ‘spreading the pain’ – so both the new residents and the existing population would be less well served by infrastructure than they would under the other options.

### Employment land

- 6.79 As discussed in Chapter 2 above, employment land needs have not been quantified at this stage; but it is clear that the identified land supply falls well short of demand, specifically for industrial uses (covering both manufacturing and logistics).
- 6.80 We have identified one potential strategic development site, SL001 North of Colnbrook, that we consider would be suited to 100% employment use, due to its location and amenity issues. The other potential development locations we have identified are generally suited to either residential or a mix of uses. The larger sites, such as WM007 Paley St, are especially well suited to accommodate employment uses alongside housing. This should be encouraged as part of options A and B, as it would result in more sustainable development.
- 6.81 If option C is adopted, integrating employment uses may be more challenging, because development locations will be smaller and some of them may be unable

to accommodate a mix of uses. Under this option, some sites may be identified for employment development only.

## Summary

- 6.82 Our evidence suggests that there is a range of possible options to accommodate the unmet housing need of our core study area to 2039. We have identified more than enough land to meet that need, and suggested how the distribution of new homes can be aligned to the geography of need.
- 6.83 A range of broad options have been discussed, ranging from one site to accommodate all the area's need to many sites. Our brief does not extend to making recommendations. It is limited to exploring and demonstrating what may be possible.
- 6.84 It is also important to note that significant further work would be required to develop our options. It is always possible that closer analysis could show that some of the land we have identified cannot be developed, due to the weight of physical and non-strategic policy constraints. It may be also that potential development land we have identified will be required to meet the future need of other local authorities in the wider study area and beyond (in this study, our assessment of need has only covered the core area).
- 6.85 Despite these, the main conclusion from this study is that there is large capacity in the study area to deliver new homes, dependent on two conditions. Firstly, there would need to be a revaluation of strategic policy constraints, specifically the Green Belt; inevitably this will be controversial. Secondly, sustainable development on a large scale will require large investment in strategic transport infrastructure. While development in the area is highly viable and can provide a contribution towards that investment, public funding would also be required.
- 6.86 Related to this is the fact that this infrastructure may take a very long time which will need to be considered if the Councils choose to rely on a small number of large sites. A large site strategy may, in the longer term, be more sustainable, but the lead in time may still require a new generation of smaller sites.
- 6.87 Under the business-as-usual option, relying on development of many smaller sites, existing communities and new residents would share the burden of poor social and physical infrastructure. Our other options, where development is concentrated at a small number of large sites, would deliver better and more sustainable infrastructure. Those more ambitious options would require an infrastructure led strategy, working with stakeholders to address any funding gaps, to deliver holistically sustainable development.

## 7 Conclusion

- 7.1 This document develops Part 1 and concludes the Wider Area Growth Study (WAGS), funded by MHCLG. It was commissioned jointly by Councils for the Royal Borough of Windsor and Maidenhead (RBWM), Slough Borough and the former South Bucks and Chiltern Districts<sup>40</sup>. It is part of the evidence base supporting long-term planning for the area, including joint working between local planning authorities under the Duty to Co-operate.
- 7.2 The subject of WAGS is the supply of possible sites to meet future housing needs of the urban cluster formed by the towns of Slough, Maidenhead and Windsor, together with the southern part of the former South Bucks District. The area is experiencing strong population and economic growth pressures, and has high housing targets, so in the long term it may not be possible to meet all its development needs within the boundaries of its respective local authority areas. Supply may be especially constrained in Slough, which is built up to its administrative boundary. The purpose of WAGS is to apply the same methodology across the wider area to identify sustainable spatial options for meeting those development needs, over and above the land already identified in current and emerging development plans.
- 7.3 The report can only be seen as evidence and does not set policy. What it does demonstrate is that, in order to meet housing (and economic) needs in the areas where there is demand and the local population can afford them in future plan rounds the Councils will need to make some difficult decisions. The Parcels identified in this Part 2 have demonstrated there is sufficient land, but existing Policy and manifesto frameworks will need to be revised and adapted to accommodate them.
- 7.4 The study has purposely not considered the Greenbelt as a constraint. This is because, as currently drafted this is a policy designation and while long lasting there is an expectation it is periodically reviewed, and Local Plan reviews should do this if needed. It is perhaps the best example of the challenges ahead and the need to balance communities' expectations that development plans, often with long end dates, effectively protect land from development until this end date.
- 7.5 In this report there is no suggestion from Stantec that the options that we have explored should or could be allocated for development under current policy. Nor that the land constraint policies need to flex or be amended. Setting aside policy most significantly the physical and social infrastructure is not currently in place to enable sustainable development in many of the areas we have looked at. But this is common – 'spare' or surplus development capacity is rare and if there were easy win solutions they could/should already be inside the development plans.

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<sup>40</sup> After South Bucks became part of Buckinghamshire Council, the County Council withdrew from the commissioning group. But the study's objectives and method did not change. This appeared pragmatic given the issue of unmet need was unlikely to dissipate and the *former* Council had agreed the area of search. It is recognised that Buckinghamshire Council may take a different approach to where housing need may be addressed in their future plan.

This piece of work is about exploring the longer term options and laying the groundwork for future plan-making.

- 7.6 Our work highlights the fact that difficult choices have to be made if the area is to meet its identified housing and economic needs but the Standard Method, used to derive housing need, is only a starting point. The Councils may provide for less. But in such a scenario the objective of our Part 1 work, to identify an area of search where existing and future residents may choose to live may be jeopardised. The ultimate policy choice may be that people are provided with new homes remote from where they wish to live. But that is not a matter we can balance in this evidence report.

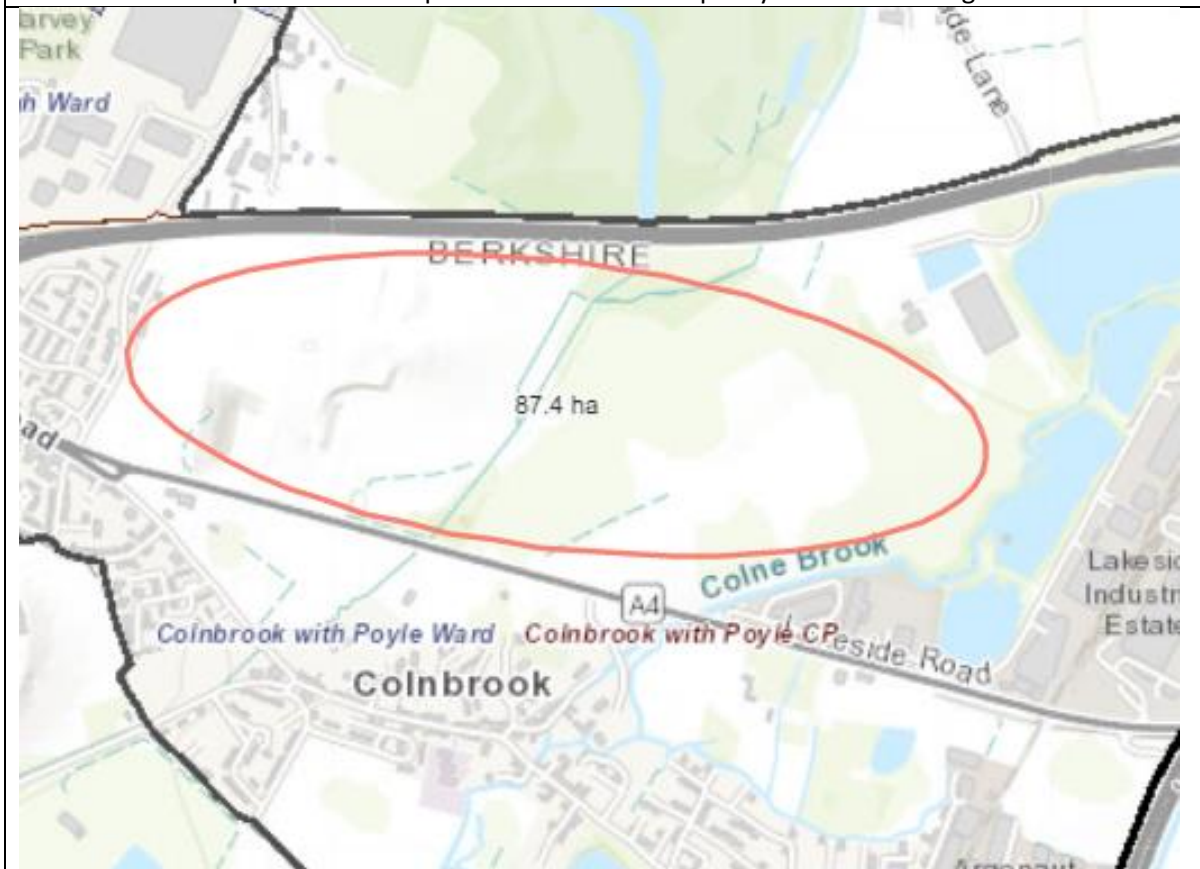
## Appendix: Site-by-site Summaries

### SL001: North of Colnbrook

This parcel is partially constrained by potential Heathrow Runway 3 issues, and those posed by the BIFFA waste site to the west. Much of the site would be in the 'public safety zone' for this runway, if developed.

Housing may be less feasible due to access constraints and critical mass issues. Employment would likely be better suited to this location.

The parcel site area has been reduced to a small degree (87 ha to 86 ha) but note that the developable site area may be limited further still by the presence of pylons. We also note the presence of a landfill site on the western part of the parcel. If the site were to be developed for residential development we anticipate it would have a capacity of 1800 dwellings.





### SB001: North-east of Slough

The parcel's site area has been reduced (from 1137 ha to 364 ha). Development in this parcel, particularly towards the south, would rely on appropriate transport mitigation.

Regarding transport, we note the likely need for a new strategic route due to limited access towards Slough. Maintaining a suitable buffer around the railway line would also reduce the hectare of the site to some extent.

Part of the parcel surrounding Middle Green lies within flood zone 3.

We note the presence of potential waste/landfill sites towards the western boundary of the site. Ecology designations have brought the parcel boundary down from the north due to clusters of ecology designations around Langley Park/Black Park to where it is less constrained.

Ecology designations in the vicinity of Ridgeway Trading Estate (to the east of the parcel) have also been removed. The parcel does not proceed south to Richings Park because of high archaeological potential in this area.

The parcel lies within the Burnham Beeches SAC 5.6km Zone of Influence.

The parcel is on the border with Slough, where the borough council is considering promotion of the green belt Market Lane site through its next local plan. It is likely that this site would only progress in a scenario where more comprehensive development was also planned beyond that site within South Bucks.

There may be an opportunity for a strategic site, should transport and flood risk needs be accommodated. We anticipate an indicative capacity of 5,800 dwellings.



## SB002: South of M40 / A412

Parcel amendments have been made to accommodate ecology concerns to the west of the parcel, and a small amount of flood risk at the northern end.

Some parcel adjustments were made around the A4020 to create some space around the settlement of New Denham but likely to involve some coalescence with New Denham, and to exclude an area of existing woodland.

A proportion of the parcel sits within flood zone 1 to the southeast.

Parcel sits within two SBDC SSSI Impact Zones. These are at Old House Wood near to the River Alderbourne and near Denham Green at Old Rectory Meadow.

The original parcel measured 117 ha, the amended parcel 49 ha. We also note minerals extraction is ongoing in an area south-east of the A412 (allocation M2), and the M4 minerals allocation to the north-west of the A412. We anticipate an indicative capacity of 1,000 dwellings.



### SB003: North of Farnham Royal

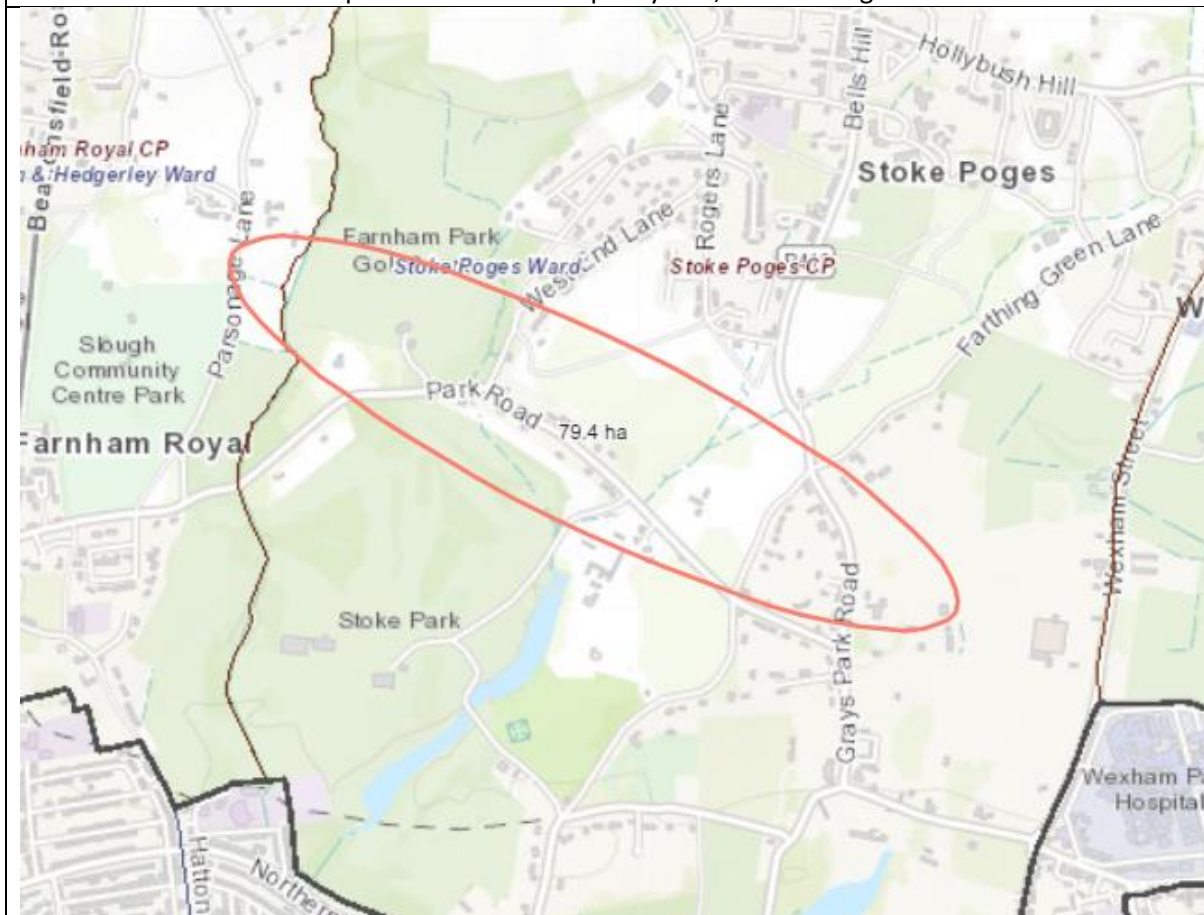
We have reduced the original parcel size from 228 ha to 79 ha. We understand development at Farnham Park Golf Course is restricted by a covenant and has been removed for this reason. As a result, the parcel would essentially result in two parts – eastern and western.

The parcel is adjacent Stoke Park Conservation Area – the setting of which could affect development.

The parcel lies within the Burnham Beeches SAC 5.6km Zone of Influence.

The parcel as a whole is constrained by transport and landscape to the east and ecology to the west. Particularly, transport is constrained by limited north-south access into Slough, as per other parcels around the periphery of Slough.

It is likely that the parcel would need to be broken up into two smaller sites either side of Farnham Park Golf Course. We anticipate an indicative capacity of 1,700 dwellings.



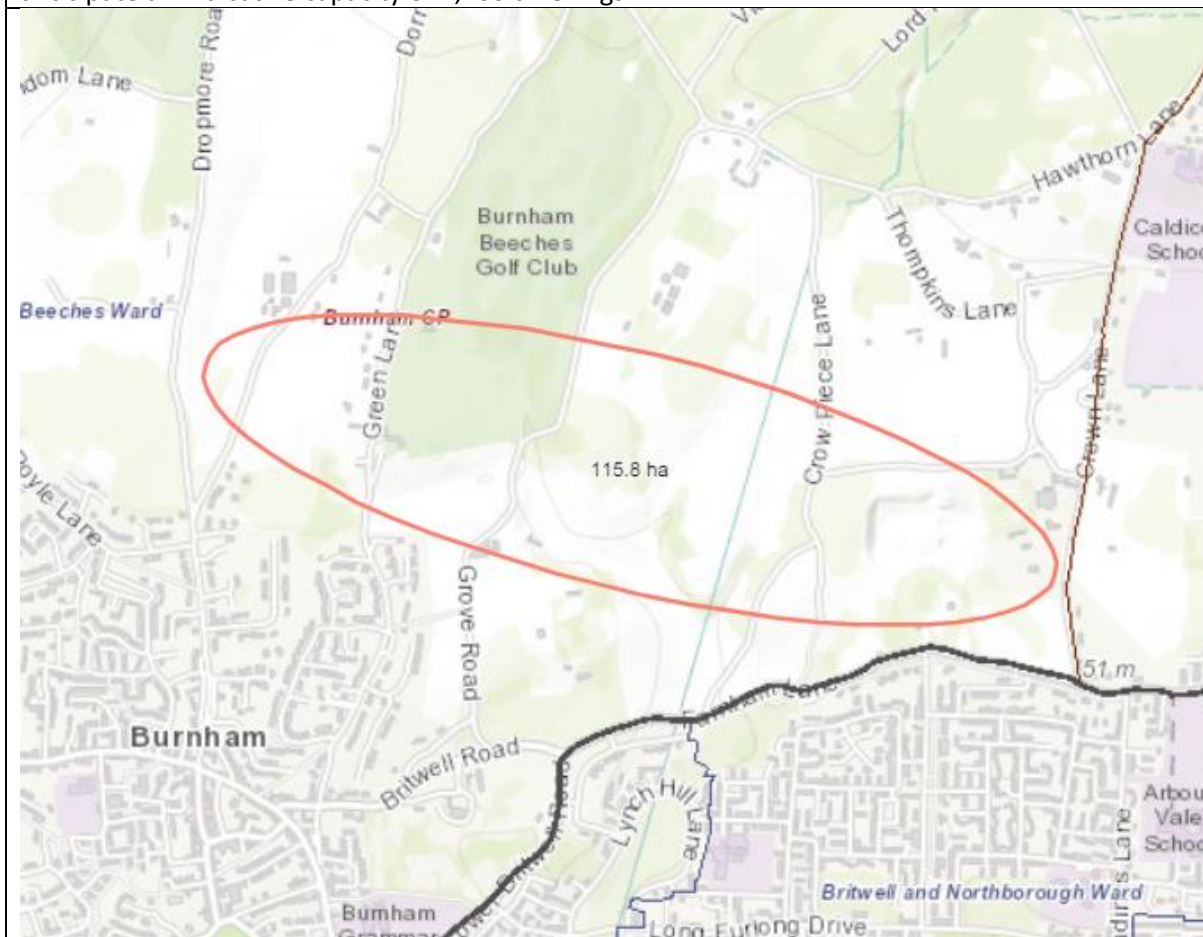
### SB006: North of Britwell, West of Farnham Common

The original boundary of the parcel (454 ha) has been significantly reduced (115.4 ha). Opportunities at the site are particularly impacted by transport constraints, and ecological designations. Access to the site from the north into Slough is constrained by the lack of strategic roads and transport needs bring the parcel boundary closer to Slough. To the north of the site is also the location of Burnham Beeches, an SAC containing numerous Ancient Woodland parcels. We note the potential waste/infill sites clustered on the eastern side of the site.

Site lies within Burnham Beeches SAC 500m Avoidance Zone and 5.6km Zone of Influence. There is a Flood zone 3 designation to the south at Grove Wood.

East Burnham Quarry phase 1 and 2, to the eastern end of the identified area, is being extracted with phased restoration. Phase 3 is covered under ROMP permission and has a viable mineral reserve and could be extracted subject to further planning permission. This could therefore impact development timing.

The redrawn development parcel remains at odds with a number of smaller ecology designations, particularly, Priority Habitats through the middle of the site. This may limit the site practically. We anticipate an indicative capacity of 2,200 dwellings.



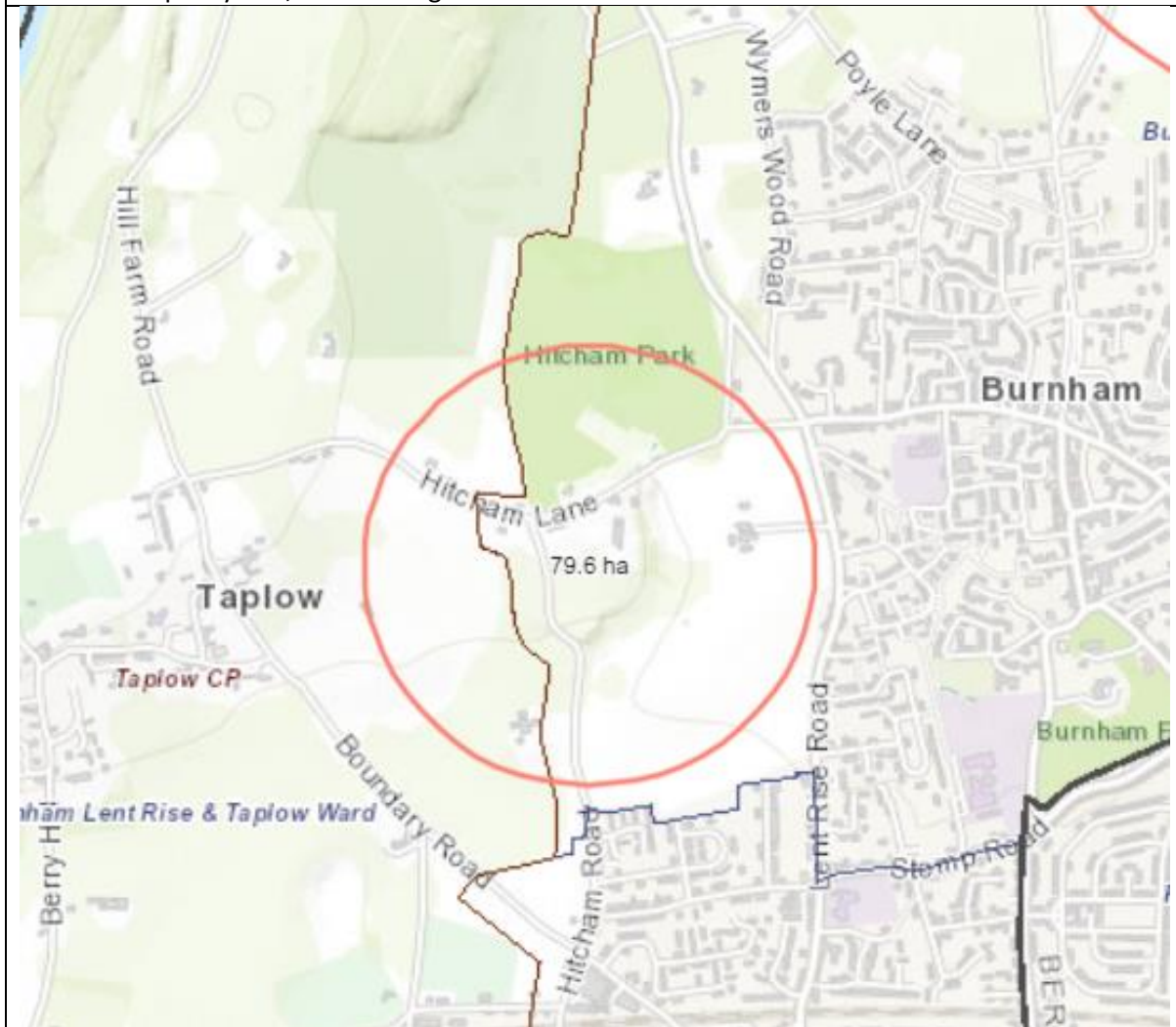
### SB007: Between Burnham and Taplow

The boundary of the parcel has been amended to account for heritage considerations around Taplow and to the south of Hitcham Park.

Ecology designations have brought the site parcel boundary slightly down from the north. There are no watercourses which pass through the site, and the entire site is located within Flood Zone 1. The parcel lies within Burnham Beeches SAC 5.6km Zone of Influence.

The parcel is within the setting of Taplow Conservation Area.

The majority of the site is at a 'Very Low' risk of flooding from surface water. We anticipate an indicative capacity of 1,700 dwellings.

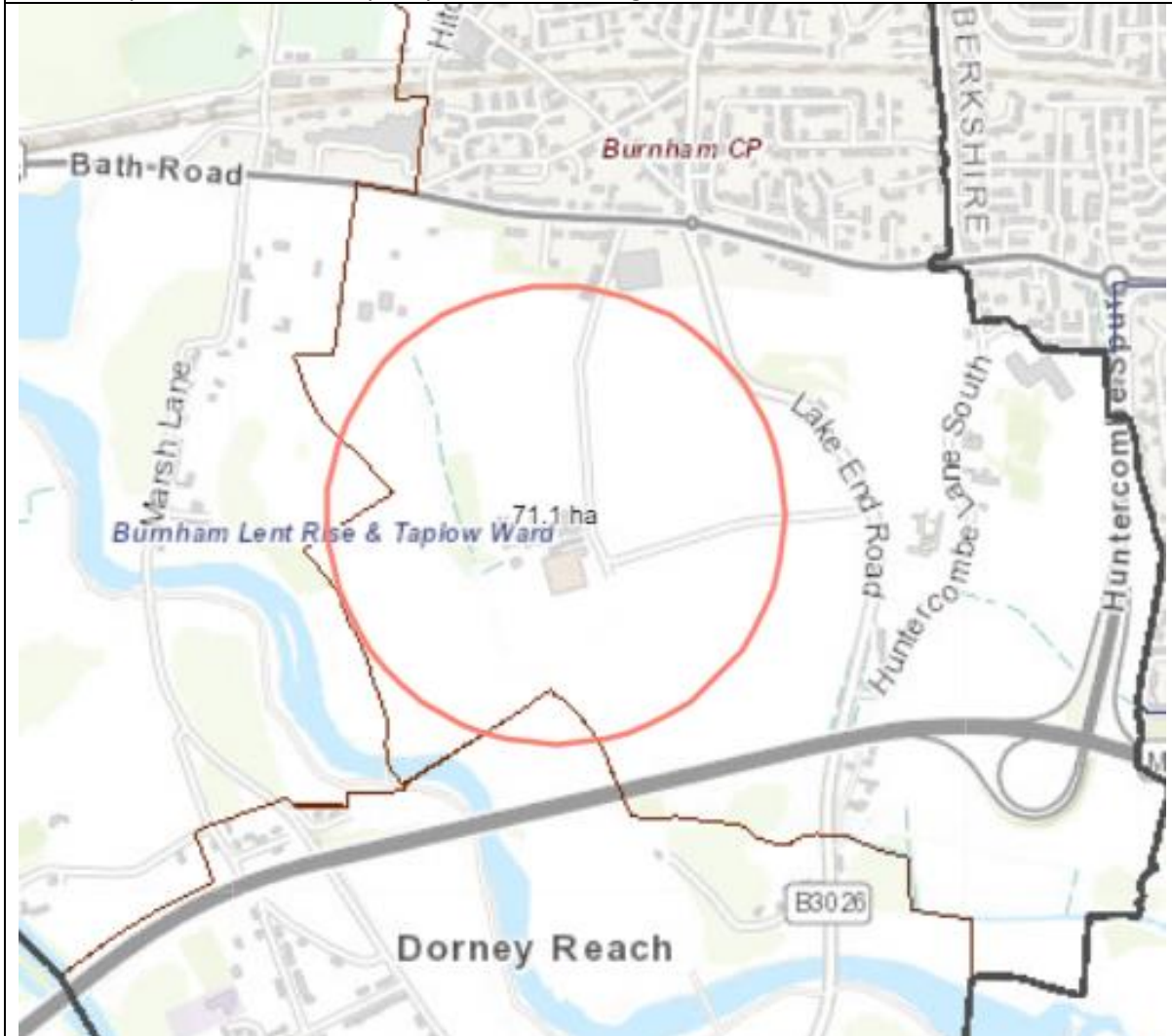


### SB008: West of J7 / South of A4

This site has been amended from 94 ha to 71 ha, due particularly to heritage and ecology. There is a Priority Habitat around the centre of the parcel which has been omitted, along with a number around the periphery of the parcel. There are also heritage constraints to the east of the site located around Burnham Abbey, around which a suitable buffer with development should be maintained. The east the site is also within the setting of Huntercombe Conservation Area (which is to the east of Lake End Road). A buffer has been incorporated into the shape of the parcel. A substantial part of the south-west parcel is within flood zone 2 (south-west side of the parcel). Some of it also lies within Flood Zone 3.

Site lies within the Burnham Beeches SAC 5.6km Zone of Influence.

We anticipate an indicative capacity of 1,500 dwellings.



### WM001: West of Cookham

This area has been reduced from 223 ha to 57 ha – predominantly for reasons relating to landscape and the coalescence of settlements, and heritage considerations. We have selected an option of locating development on the part of the site to the north of Long Lane, therefore preserving the gap with Furze Platt.

Reducing the site size in this manner however does reduce the scale of the site substantially. Additionally, we note there is a potential housing allocation on the eastern limb of the parcel around the Long Lane Industrial Estate. We anticipate an indicative capacity of 1,200 dwellings.



### WM002: East of A404, South of Bisham

The amended boundary shows a possible built development boundary.

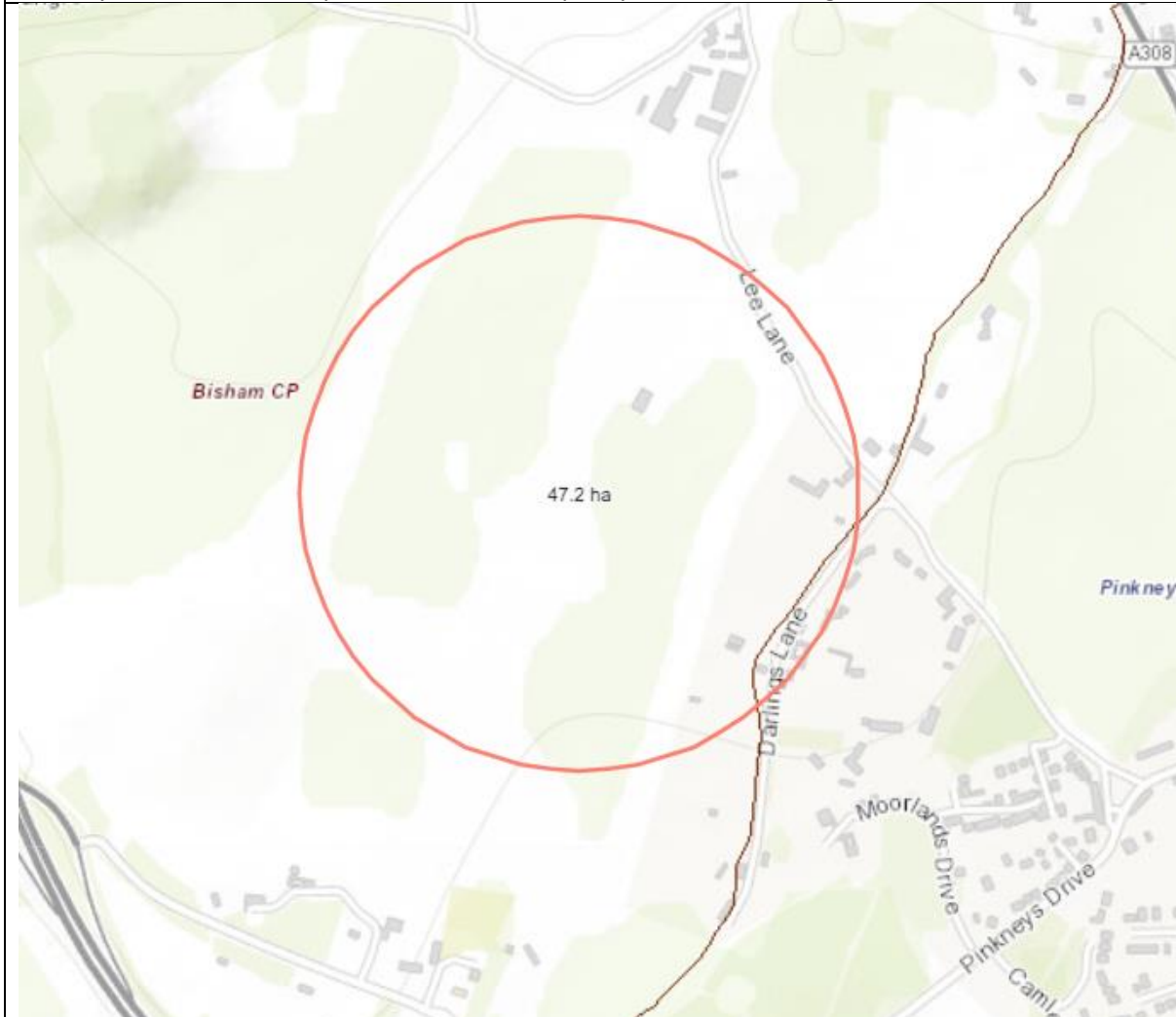
There are no watercourses which flow through the site. The River Thames is located to the north west of the site. The entire site is located within Flood Zone 1.

The majority of the site is located within an area of 'Very Low' or 'Low' risk of flooding from surface water. There are a few localised areas with a 'Medium' or 'High' risk of flooding from surface water.

The site is not at risk of flooding in the event of reservoir breach.

The site is located within a surface water safeguarding zone.

The site area has been reduced to account for the presence of registered Common Land around Pinkneys Green. We anticipate an indicative capacity of 1,000 dwellings.





### WM003: South of A4 / Walthams

Significant transport and access constraints, including severance issues caused by the railway line at this largely rural parcel, have resulted in a large reduction in parcel size – 656 ha to 64 ha – located to the south of Maidenhead Office Park.

There are clusters of heritage assets and ecological constraints spread throughout the original site. There is high potential for prehistoric and roman archaeology. The revised parcel contains the site of White Waltham Airfield. We anticipate an indicative capacity of 1,300 dwellings.

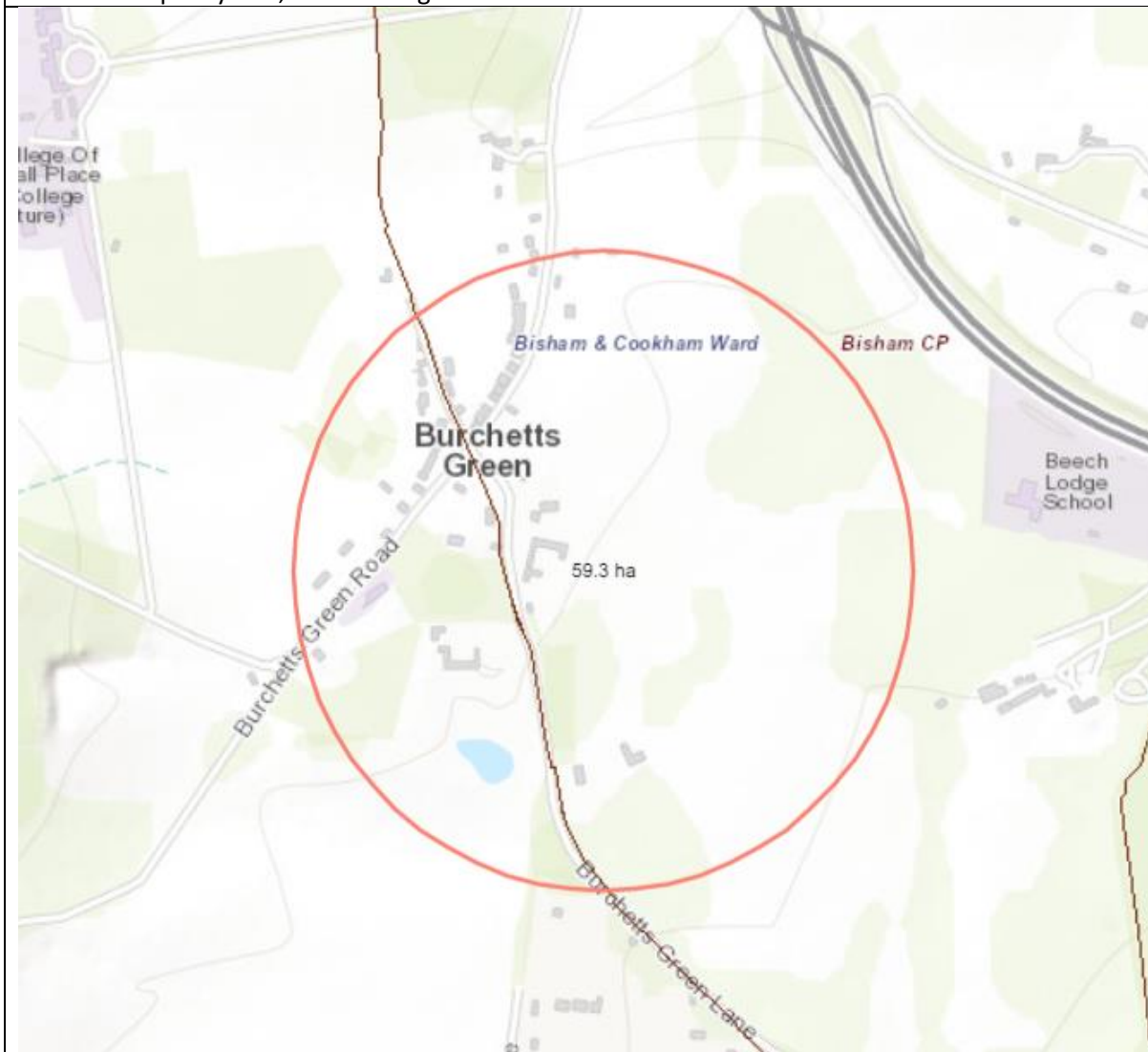


### WM004: East of Burchetts Green

The amended boundary shows a possible built development boundary. There are no watercourses which flow through the site. The entire site is located within Flood Zone 1. The majority of the site is located within an area of 'Very Low' or 'Low' probability of flooding from surface water. There is an area of 'Medium' and 'High' risk of flooding from surface water which stretches across the middle of the site along Burchetts Green Lane and towards Honey Lane. There are a few isolated areas of 'Medium' and 'High' risk associated with localised areas of depression in the topography.

The site is not located within an area at risk of flooding in the event of a reservoir breach.

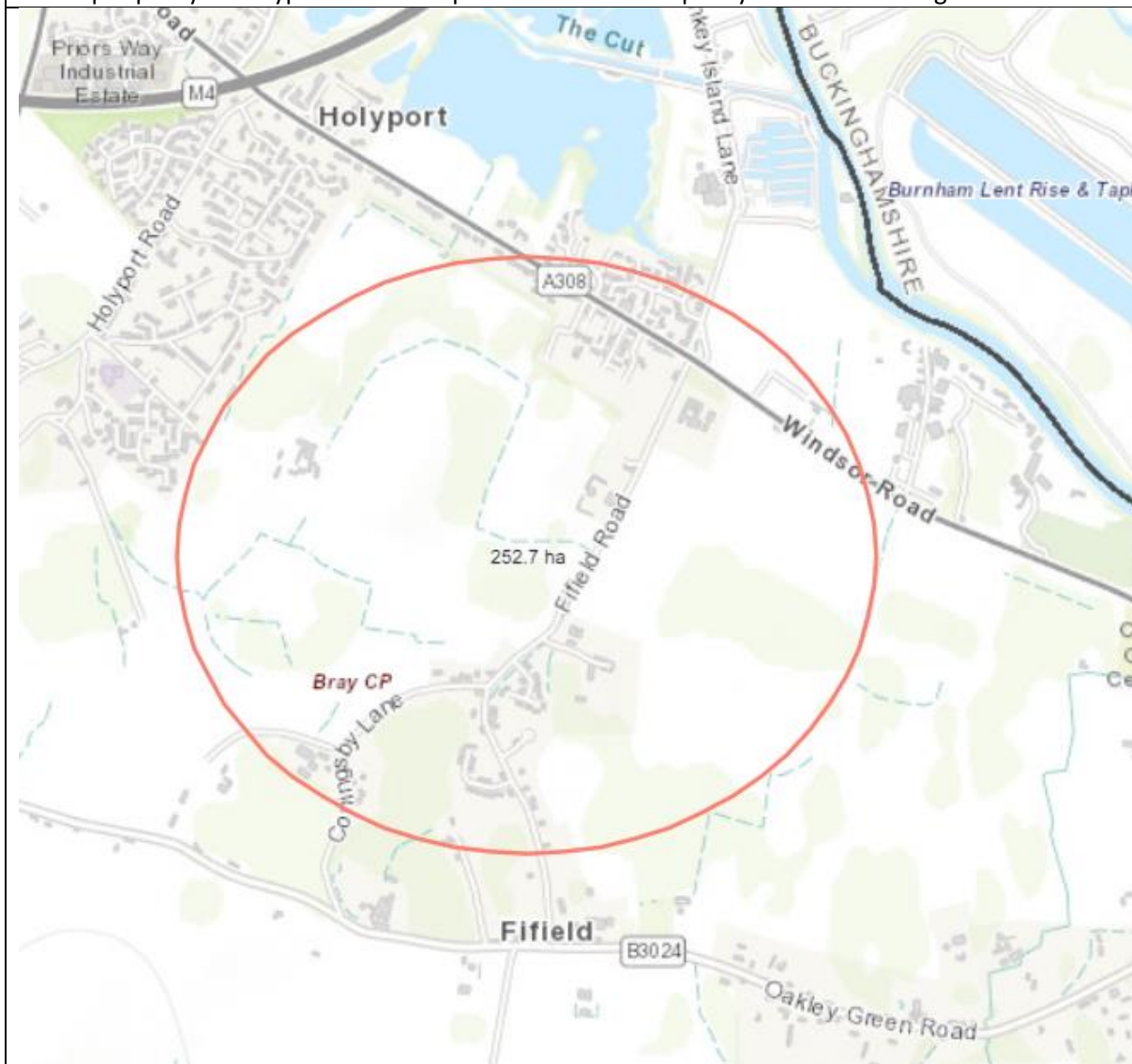
The site is located within a surface water safeguarding zone. The local planning authority should be contacted to confirm if the site is located within a critical drainage area. We anticipate an indicative capacity of 1,200 dwellings.



### WM006: A308 East of Holyport

Some small amendments have been made to this parcel (from 339 ha to 252 ha) and some heritage and ecology related designations remain within the parcel – however, we suggest that the size of the site and relative lack of constraints may be able to enable development at scale. We note the presence of Grade 1 agricultural land on the site, and potential waste infill site towards on the north-east of the site. The eastern part appears to have been promoted for development previously. Any potential development proposals would need to consider heritage impacts of the cluster of listed buildings around Stroud Farm.

Comprehensive development at this parcel would greatly increase the quantum of development at the periphery of Holyport. We anticipate an indicative capacity of 4.500 dwellings.



### WM007: Paley Street

This expansive, majority rural parcel (3794 ha) has been reduced considerably (741 ha) in the interests of, particularly, ecological and flood related designations, and transport and access considerations, as well as the potential large-scale residential-led Jealott's Hill development allocated in the draft Bracknell Forest Local Plan. Smaller instances of ecological and heritage designations remain within the amended parcel, however it remains of significant scale, and we believe there is scope within for a strategic opportunity to the north of Jealotts Hill within the RBWM area. However, this would only be enabled through the right transport solution. We anticipate an indicative capacity of 10,400 dwellings.



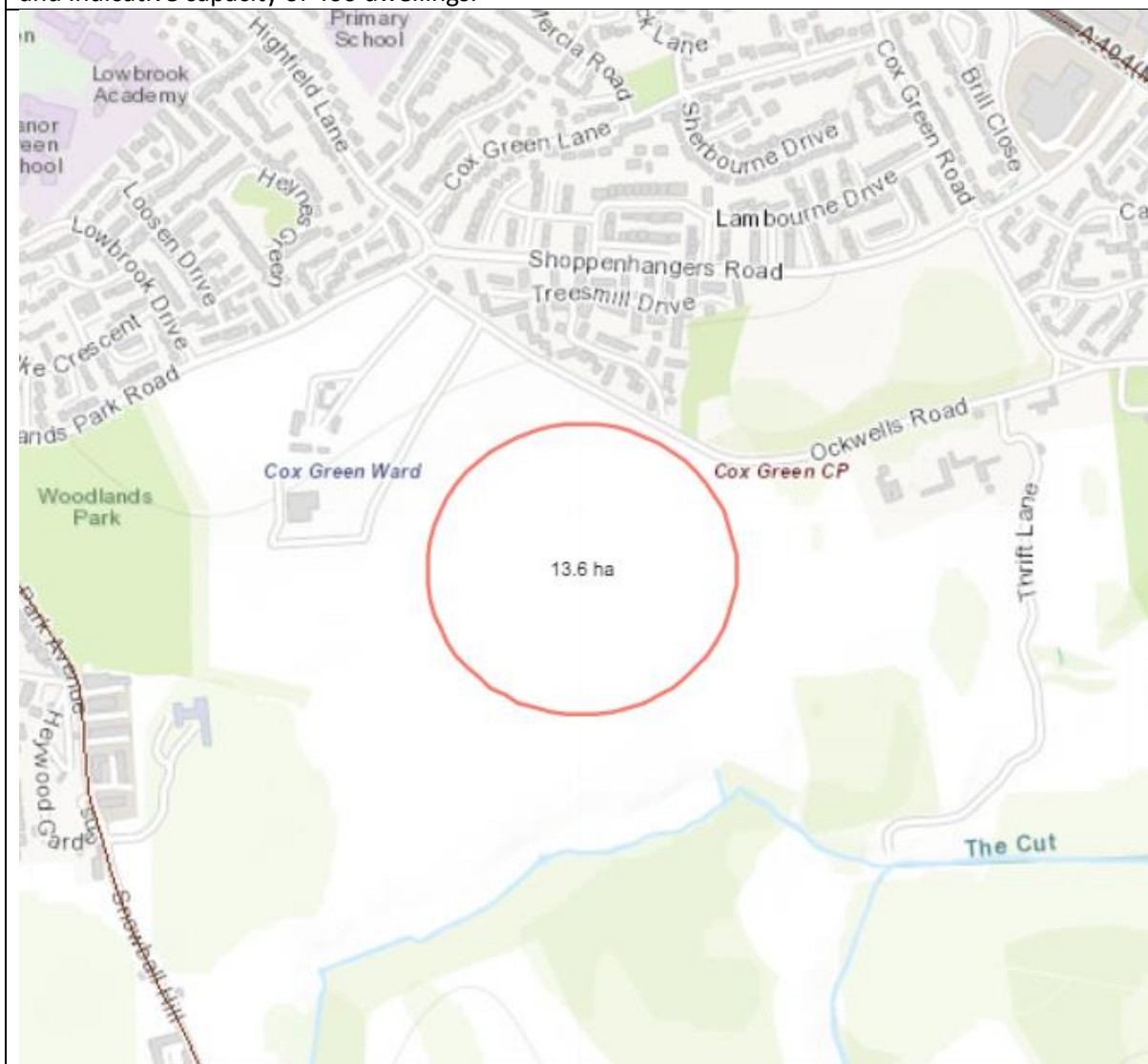
## WM008: South of Cox Green, Maidenhead

This development parcel has been reduced from 25 ha to 14 ha due mostly to constraints imposed by heritage assets associated with listed buildings at Ockwells Manor and Lillibrooke Manor. There is a National Trust covenant present which protects the agricultural character of the land near the Ockwells Manor and the views from the manor (this prevented development of the land directly to the north of Ockwells Road in 2012.) This has been excluded from the parcel, which has reduced the area considerably.

There are no watercourses which flow through the site. The majority of the site is located within Flood Zone 1, meaning there is a low probability of flooding. There is a small area of the site along the southern boundary of the site which is located within Flood Zone 2.

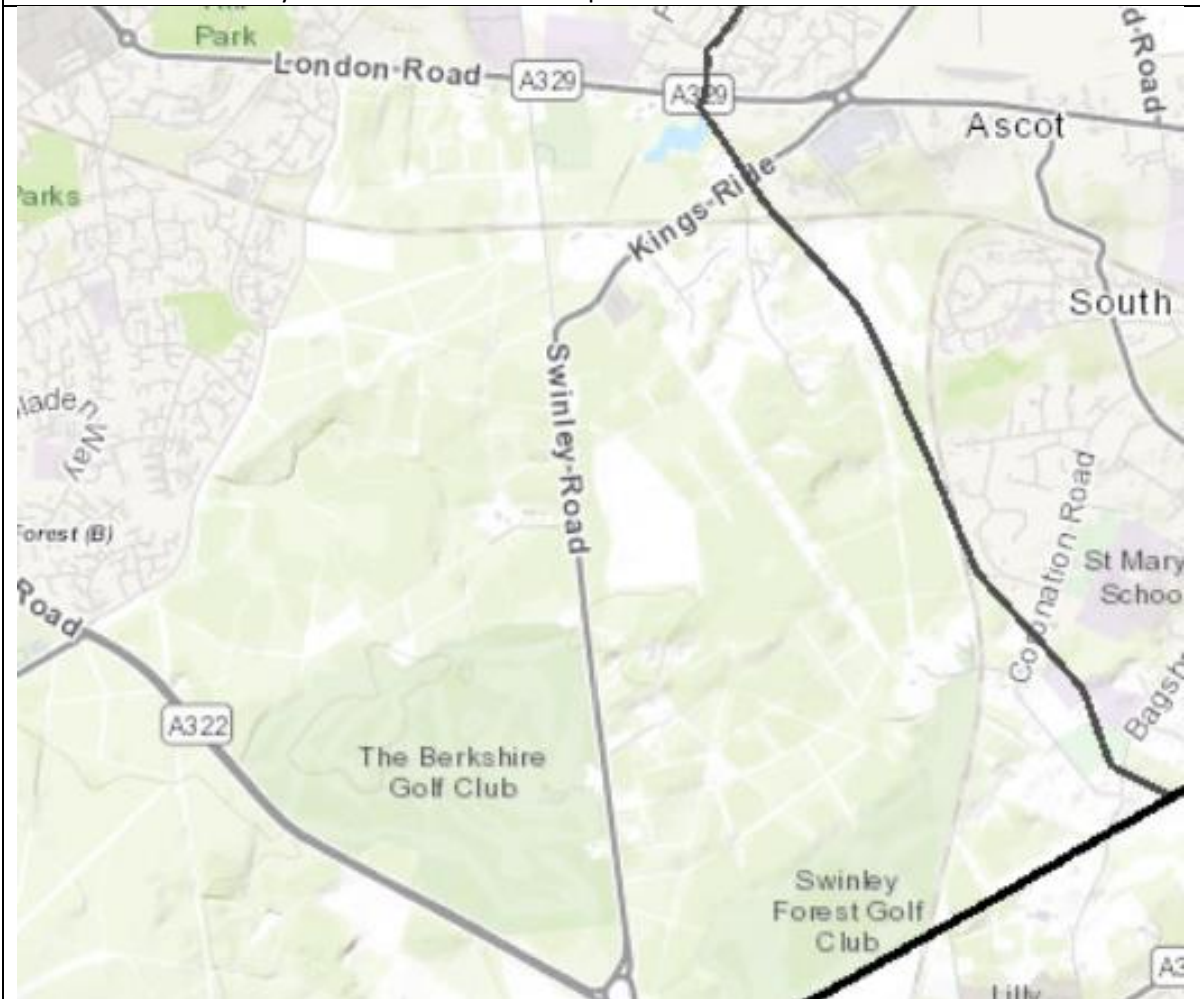
Site is approximately 250m from Great Thrift SSSI which is designated for its ancient woodland with a rich ground and shrub flora.

The Site is within the Great Thrift SSSI Impact risk zone for residential development. We anticipate an indicative capacity of 400 dwellings.



### B001: South East of Bracknell

This parcel is essentially covered by woodland and is so constrained by ecological designations – particularly the Swinley Park and Brick Pits SSSI and Priority Habitats – and flood risk that it is not workable as a strategic site. The north-western part of this parcel (ref. WINK22) and Lavender Park Golf Centre (WINK23), Woodstock Kings Ride (WINK24), Highbury (WINK25), and Kings Ride (WINK37) were considered as a potential sites in the Bracknell Forest SHELAA. It was recommended that these sites did not proceed as allocations due to the extent of constraints relating to, among other things, landscape sensitivity, ecological designations, flood risk, and (in the case of WINK22) odour from the adjacent wastewater treatment works. To the north of the parcel, the Pre-Submission BFLP allocates a small site for 6 dwellings (Palm Hills extension, WINK34). This is an extension of the existing Palm Hills allocation for 49 dwellings made through SA 3 of the adopted Site Allocations Local Plan. We also note other (omitted) smaller SHELAA sites outside the parcel to the north of London Road, and to the south-east around Coronation Road. No amended boundary has been drawn for this parcel.

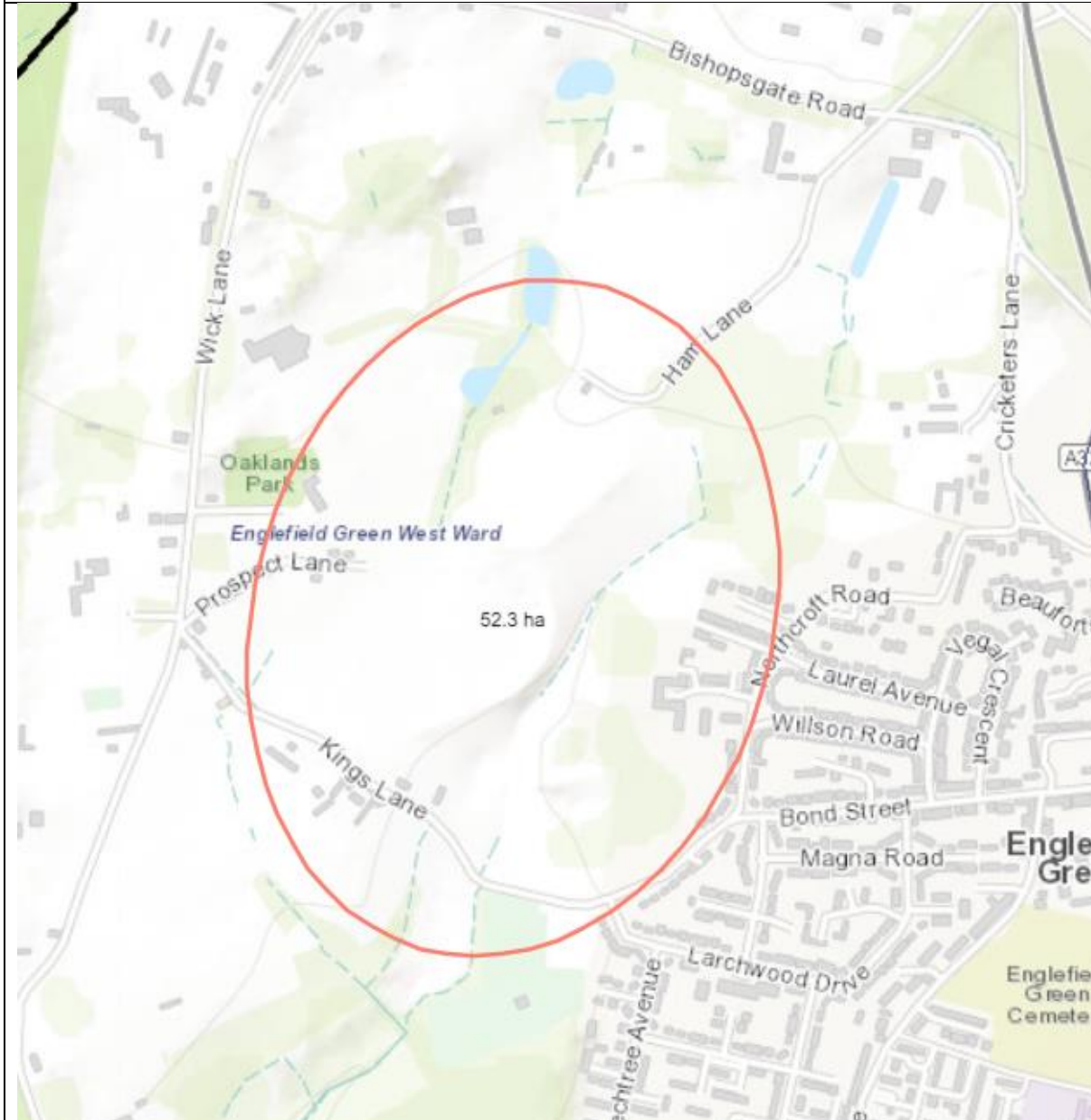


### R001: West of Englefield Green

Ecological designations constrain the site (99 ha) substantially and reduce its development area (58 ha).

The site maintains a buffer with the listed historic park and garden to the west, but this large designation remains nearby. The site is also constrained by limited access.

The parcel is also potentially constrained by its proximity to Windsor Great Park due to heritage visual sensitivity. We anticipate an indicative capacity of 1,100 dwellings.



### SH001: North of Windlesham

This parcel (205 ha) is almost totally covered with a woodland and is heavily constrained by ecological designations. A 33 ha site has been drawn along the boundary with London Road, however this site is still constrained by some Priority Habitat sites. We anticipate an indicative capacity of 800 dwellings.

