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**WINDSOR &
MAIDENHEAD**
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Wider Area Growth Study

Part 2:

Potential Locations for Development

Final September 2022

For:

**Royal Borough of Windsor and Maidenhead
and**

Slough Borough Council

Stantec UK Ltd

Registered Office: Buckingham Court Kingsmead Business Park, London Road, High Wycombe,
Buckinghamshire, HP11 1JU

Office Address: The Stills, 1st Floor, 80 Turnmill Street, London EC1M 5QU

T: +44 (0)20 38246600 E: PBA.London@stantec.com

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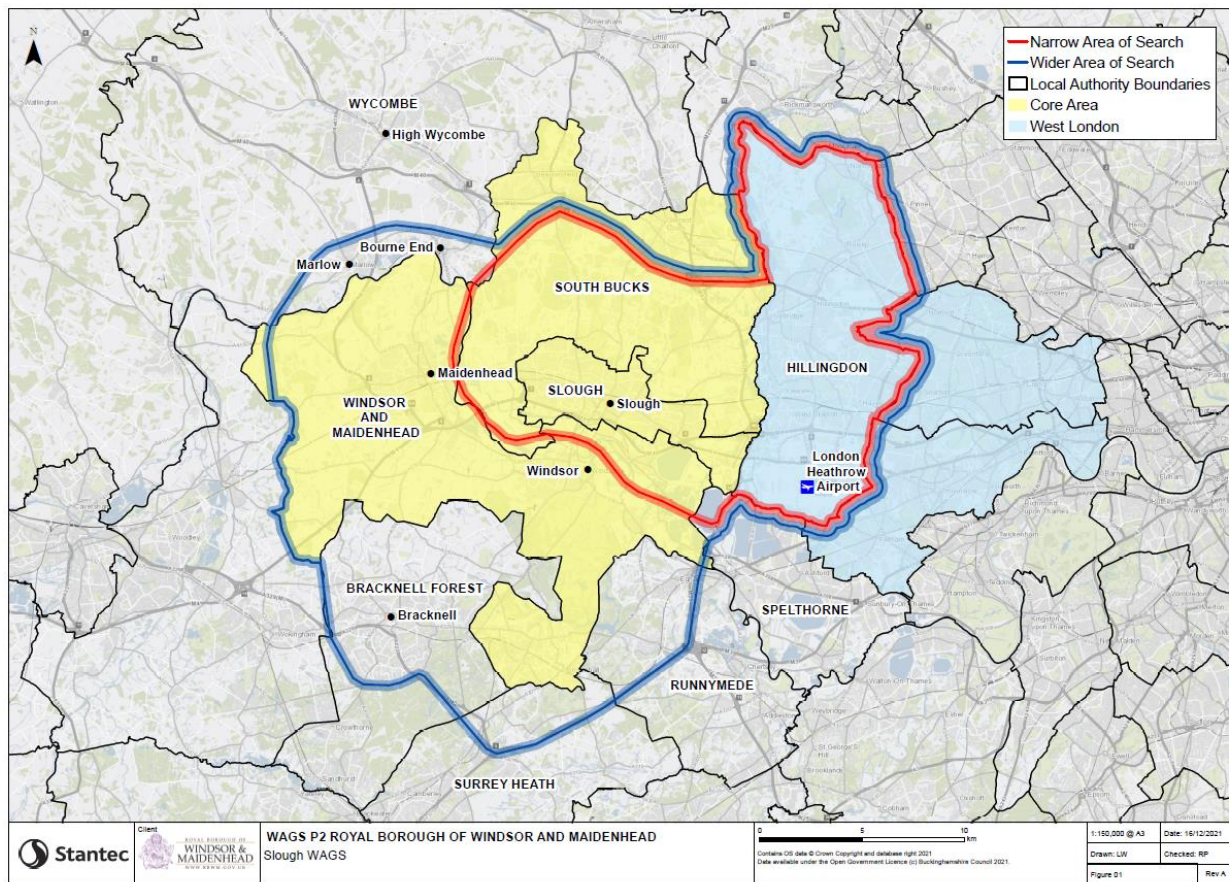
1 Introduction

- 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 2019¹. 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.

¹ 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 so². 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

² 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.

- 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 Framework¹², 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 sites¹³?

- 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

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

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

- 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	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.

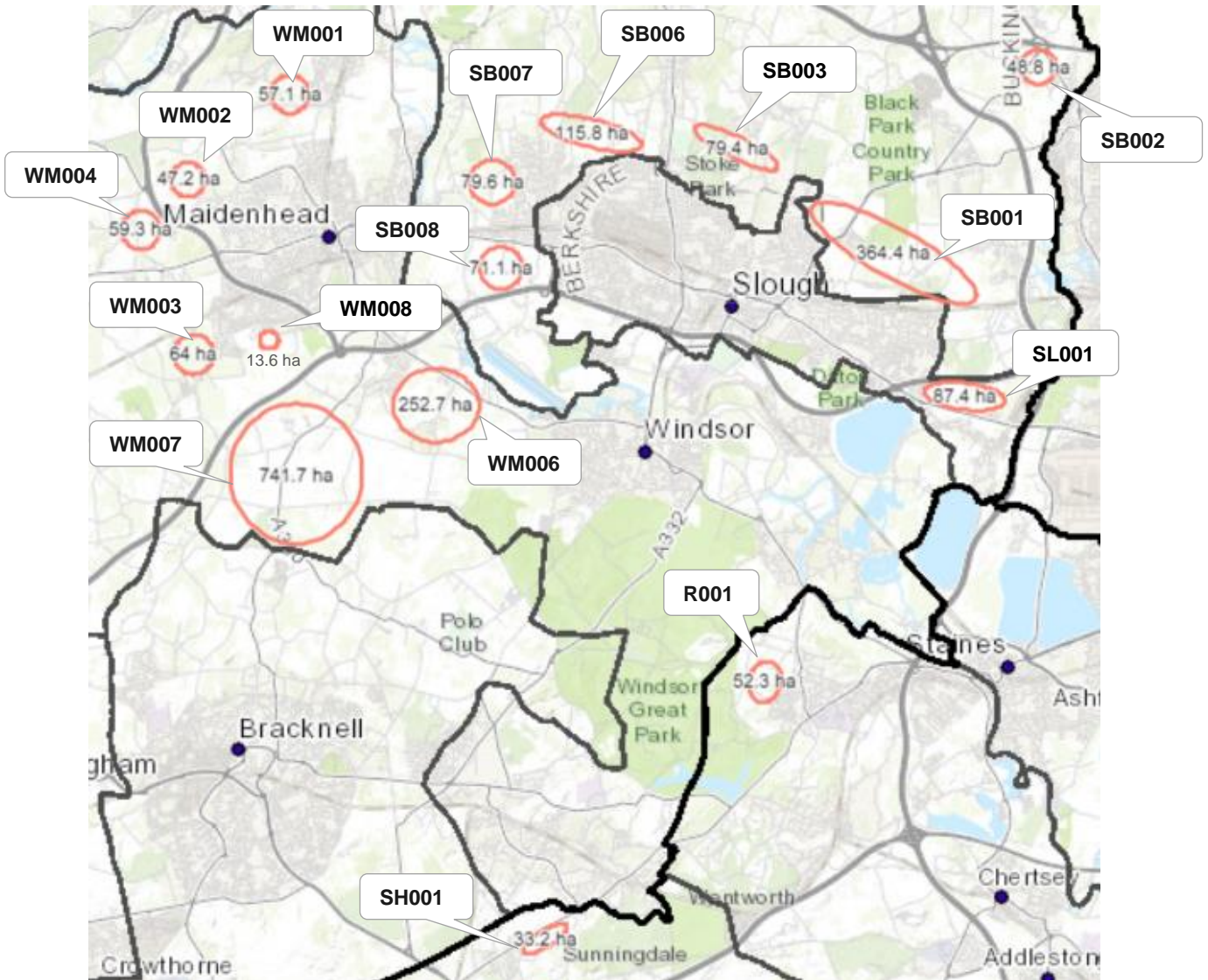
Table 4.3 Potential development parcels

			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
Total			8,533	2,162

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.

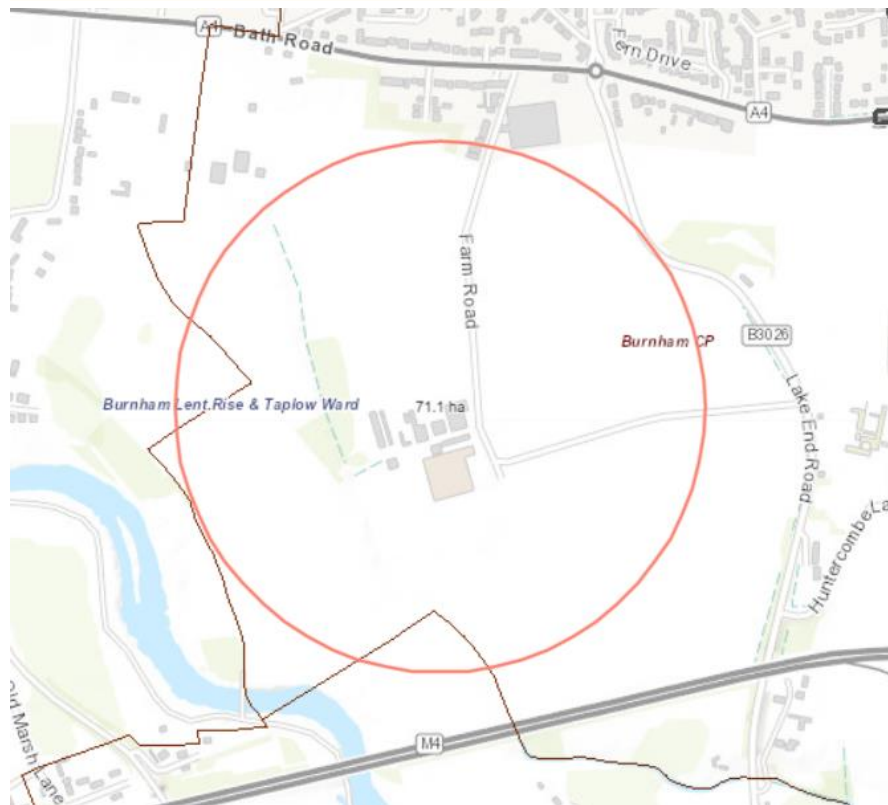
Figure 4.1 Potential development parcels



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.

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

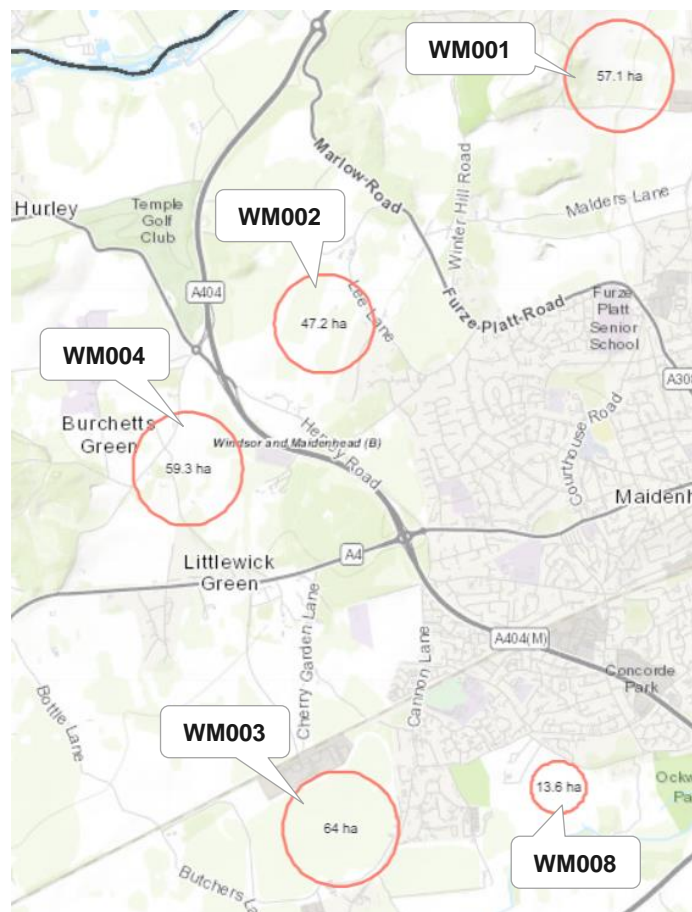
deliver access from the M4. If however, the scale was reduced significantly, then this would be unlikely to meet the policy requirement of being strategic, or to afford such access infrastructure. In that case, development would use the existing A330 or A308.

- 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



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 Districts⁴⁰. 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.

⁴⁰ 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.

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.

