

## Slough Borough Council

<b>Report To:</b>	Planning Committee
<b>Date:</b>	26 <sup>th</sup> November 2025
<b>Subject:</b>	Slough Borough Council response to the Buckinghamshire Draft Local Plan consultation
<b>Chief Officer:</b>	Dan Ray; Chief Planner
<b>Contact Officer:</b>	Kerry Hobbs, Senior Planning Policy Officer
<b>Ward(s):</b>	All
<b>Exempt:</b>	NO
<b>Appendices:</b>	Slough Borough Council response to Buckinghamshire Draft Local Plan consultation

### 1. Summary and Recommendations

- 1.1 The purpose of this report is for Members to note that Buckinghamshire Council published the following documents for consultation, with a supporting evidence base:
  - Draft Local Plan for Buckinghamshire Part A – Spatial Strategies; and
  - Draft Local Plan for Buckinghamshire Part B – Development Management Policies.
  - Evidence base including Sustainability Appraisal
- 1.2 The consultation ran for a period of 6 weeks from 17th September 2025 to 29th October 2025 and the outcomes will help shape the final version of the Plan before it is submitted for Examination. Slough's policy officers made a response within this period, which supports the duty to cooperate and Soundness.
- 1.3 Members are requested to note the Council's planning policy officer response to Buckinghamshire Council's Draft Local Plan consultation in the appendix.

#### Recommendations:

- 1.4 Committee to note:
  - a) The Council's response to the Draft Buckinghamshire Local Plan consultation forms a milestone in fulfilling the ongoing duty to cooperate on policy on significant cross boundary matters.
  - b) That the Council made a valid representation to Buckinghamshire Council in response to the consultation.

## 2. Report

### Introductory paragraph

- 2.1 The Council's Planning Policy Team have been meeting regularly with Buckinghamshire Planning Policy Officers to discuss the preparation of the Draft Local Plan, and Members have met approximately annually. Buckinghamshire Council has now prepared a Draft Local Plan for public consultation, and Slough's Local Planning Authority must take the opportunity to comment formally as part of supporting positive planning in the sub-region, and meeting compliance tests for the Slough Local Plan including the legal duty to cooperate.
- 2.2 Significant work on the spatial distribution, phasing and quantum of housing is needed before the Plan is submitted for examination. The risk of not engaging effectively on this for the Plan process meeting the tests of Soundness is understood by both parties. This will be addressed through the ongoing Duty to Cooperate and set out in Statements of Common Ground or equivalents.
- 2.3 Representations invited on the following draft documents:
  - i. The Draft Local Plan for Buckinghamshire Part A – Spatial Strategies, which includes the following key themes: Vision and Strategic Objectives, Housing and Employment Strategy, Infrastructure Planning, Climate and Environmental Protection, Health and Wellbeing, Transport and Connectivity, Town Centres and Quality of Place.
  - ii. The Draft Local Plan for Buckinghamshire Part B – Development Management Policies, which sets out detailed policies that will guide and regulate development across Buckinghamshire up to 2045. These policies are intended to ensure that new development aligns with the strategic vision of the Local Plan and national planning standards, while addressing local needs and priorities.
  - iii. The evidence base which supports the Plan's proposals and its progression to submission for Examination in December 2026. This includes a sustainability appraisal.

### Background

- 2.4 The Duty to Cooperate (Localism Act 2011, section 110) substituted for regional planning by introducing a legal requirement for local planning authorities to engage constructively, actively and on an ongoing basis in the preparation of development plan documents and other strategic planning matters that have cross-boundary impacts. Paragraphs 24-27 of the National Planning Policy Framework (NPPF) guides authorities to demonstrate cooperation, including through Statements of Common Ground (SoCG).
- 2.5 Slough and Buckinghamshire Council are designated Duty to Cooperate partners, as defined under section 110 of the Localism Act (2011). The authority shares boundaries with Slough to the north, west and south-west and there are a number of cross-boundary issues that require ongoing collaboration. A draft

SoCG has been prepared that sets out the agreed position on strategic cross-boundary matters and engagement to January 2025 between Slough Borough Council and Buckinghamshire Council.

- 2.6 That SoCG identified engagement to date on the following key strategic matters : housing need, Green Belt, Gypsy and traveller accommodation and Burnham Beeches Special Area of Conservation. It also identified Strategic matters that the authorities continue to work together on as employment and retail, flooding, green and blue infrastructure, adaption to climate change and carbon management, historic environment, Heathrow Airport expansion, Colne Valley Regional Park, and transport.
- 2.7 Member and Director meetings with Cabinet Portfolio Holders for Planning, or their delegated representatives were held in March 2025 and September 2025. Both parties agreed to approve the SoCG work to date.
- 2.8 Slough Borough Council considers that the SoCG accurately records how the engagement requirements under the Duty to Cooperate with Buckinghamshire have been fulfilled to January 2025 (when the new housing methodology and changes to green belt policy were introduced). Key strategic issues have been identified and agreed for further progression. The terms of reference for this ongoing collaboration will be confirmed later in 2025, and Slough Borough Council will seek a Member-Officer meeting to formalise this process.
- 2.9 That SoCG is not included here as it has not been signed yet, but it is referred to in the response to Buckinghamshire as it forms part of the historic joint working.

### **Buckinghamshire Local Plan**

- 2.10 The Buckinghamshire Draft Local Plan sets out both strategic policies and detailed development management policies that will guide growth and development across the county up to 2045. Part A of the Plan outlines the spatial strategy, including the vision, housing and employment targets, infrastructure planning and environmental priorities. Part B contains the development management policies that will be used to assess planning applications. The evidence base prepared to date to support the plan is also published for scrutiny. These documents are critical in shaping how Buckinghamshire will meet its future needs, and have implications for neighbouring authorities, such as Slough, particularly in relation to housing provision, employment land and infrastructure planning.
- 2.11 The attached response below was sent to Buckinghamshire Council to formally respond to the Plan and cross boundary work to date. This complies with the regulations for SBC to comment on strategic policies set out in Part A, but SBC will monitor and note how Part B policies comply with and deliver strategic policies.

## **Slough Borough Council response**

- 2.12 Slough Borough Council welcomed the opportunity to respond to the consultation on the Buckinghamshire Draft Local Plan. This response focuses specifically on cross-boundary matters, as guided by discussions through Duty to Cooperate meetings held to date as set out in the SoCG.
- 2.13 Slough Borough Council's overall response welcomes the inclusion the Plan and Sustainability Appraisal to accommodate housing need in full, the spatial options identified to meet that, and the evidence and work needed to achieve that before submission. We agree with the SA that at present the options in the Plan are high level and that the lack of this evidence means it is not possible to support the Buckinghamshire Draft Local Plan at this stage. In particular, this is because the absence of detailed technical assessments and site allocations makes it difficult to determine whether Buckinghamshire will be able to meet its full housing and employment needs over the plan period, and if this will negatively affect the part of the Council that shares housing and economic development market areas with Slough.
- 2.14 Slough Borough Council retains its position that all Duty to Cooperate partners, including Buckinghamshire Council, first demonstrate how they will meet their own objectively assessed housing needs in full. Following this, joint working should be undertaken to address Slough's identified shortfall. This approach is essential to ensure that unmet needs are not displaced to Slough, which would risk exacerbating existing pressures on land supply, infrastructure and service provision.
- 2.15 Buckinghamshire Council has used the Government's latest standard method to calculate its objectively assessed housing need. This identifies a requirement for approximately 4,332 new homes per year, equating to just under 91,000 homes over the plan period to 2045. When a 5% buffer is applied, the total housing requirement rises to approximately 95,000 homes.
- 2.16 At present, Buckinghamshire has commitments for just over 22,000 homes through existing Local Plans, Neighbourhood Plans and extant planning permissions. This leaves an outstanding requirement of approximately 69,000 homes that must be planned for to meet future housing needs in full.
- 2.17 No site allocations have been identified in the Buckinghamshire Draft Local Plan at this stage, as key technical evidence is still under preparation. This includes the Housing and Economic Land Availability Assessment (HELAA), which is essential for assessing suitability, availability and deliverability of potential development sites. Without this evidence, it is not currently possible to determine whether Buckinghamshire will be able to meet its full housing needs over the plan period. The absence of site-specific allocations and supporting assessments limits the ability of neighbouring, such as Slough, to fully understand the spatial implications and cross-boundary impacts of the proposed strategy.

2.18 The Draft Local Plan outlines seven strategic approaches, each proposing a different distribution of growth across the county:

**Option 1** – Continues the current direction of travel, delivering around 12,000 homes, but with uncertainty due to the need for further technical evidence.

**Option 2** – Focuses growth on Buckinghamshire's main towns.

**Option 3** – Prioritises settlements identified as transport hubs, with reduced growth elsewhere.

**Option 4** – Emphasises settlements well-connected to key employment areas, with less growth in other locations.

**Option 5** – Directs growth towards settlements at the edge of Buckinghamshire (e.g. Milton Keynes and/or Slough), with reduced emphasis elsewhere.

**Option 6** – Promotes a more dispersed pattern of development, including smaller villages.

**Option 7** – Proposes the creation of new settlements to accommodate future growth.

2.19 Slough Borough Council supports the principle that a combination of spatial strategy options may be required to meet Buckinghamshire's full housing need. Option 5, which proposes directing growth towards settlements at the edge of Buckinghamshire, including Slough and Milton Keynes, is of strategic interest. This reflects Slough's longstanding engagement with Buckinghamshire Council on potential cross-boundary growth to help address unmet housing needs.

2.20 Slough Borough Council welcomes the range of spatial strategy options put forward by Buckinghamshire Council to meet its housing requirement, and will continue to engage on methodologies such as the HELAA and Green Belt review as part of supporting both Planning Authorities to successfully progress development plans to adoption.

### 3. Conclusion

- 3.1 SBC support Buckinghamshire progressing with Plan making, particularly to meet needs that impact our shared strategic issues. Our response to the Buckinghamshire draft Local Plan was submitted by the deadline of 29<sup>th</sup> October 2025. That report is provided in an appendix, was acknowledged as valid, and is consistent with work to date.
- 3.2 Slough will continue to engage with Buckinghamshire – including to meet legal compliance and positive planning and soundness via our duty to cooperate meetings on matters of strategic significance. Further reports may be presented to Planning Committee for Member and public information, noting that the committee is not decision making for development plan purposes.

## **4. Implications of the Recommendation**

### 4.1 Financial implications

4.1.1 This response has been prepared in house; no additional resources or costs are required.

### 4.2 Legal implications

4.2.1 No legal implications.

### 4.3 Environmental implications

4.3.1 No direct implications.

### 4.4 Equality implications

4.4.1 No equalities implications.

## **5. Background Papers**

None.