

Appendix: Slough Borough Council – Response to Draft Local Plan for Buckinghamshire Consultation 2025



Growing a place of opportunity and ambition

Please accept this as SBCs officer representation to Buckinghamshire’s Consultation on the **Draft Local Plan for Buckinghamshire**.

Slough Borough Council (SBC) welcomes the opportunity to comment on the emerging Buckinghamshire Local Plan and appreciates the proactive approach Buckinghamshire Council is taking to engage with neighbouring authorities during the early stages of plan-making.

We note this consultation has been carried out to meet the commitment in the Statement of Community Involvement at Regulation 18, and that the Sustainability Appraisal and evidence base notes the significant work to be undertaken to progress the plan to submission.

The content here focuses on matters of cross boundary significance to support Buckinghamshire and Slough to demonstrate compliance on Plan making under current regulations, noting these may change over the Plan production period. They draw on matters set out in the draft Statement of Common Ground, and which records engagement on plan making for the period 2015-2025, and intentionally concludes at the introduction of the changes to the NPPF in 2024 regarding the New Standard Method for housing need, and for the impact on the housing requirement.

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. We will review the consideration of those alongside the revised Draft Scoping Statement 2025.

SBC has had regard to Buckinghamshire Council’s published Local Development Scheme (LDS) when preparing this response and will seek to engage with key stages in

Buckinghamshire's and Slough's plan-making process to support effective and coordinated input.

We note the Draft Scoping Statement for consultation received on 28th October 2025 to update that consulted on in 2021, and welcome opportunities to collaborate as technical evidence and spatial proposals and phasing options are refined. We welcome the invitation to meet Buckinghamshire to progress this work on terms of reference, engagement and governance on matters of strategic cross boundary significance.

Please note that this response was written before receiving this. While we have aimed to refresh it, elements may not respond to it. In the interest of positive engagement we have also now chosen not to submit detailed comments prepared on topics, milestones, timeframes and outcomes of engagement not referenced in the consultation materials, as these are now shown as draft in Appendix 1 and 2 of the Strategic Liaison Draft Scoping Statement.

Housing requirement and site allocations

SBC notes Buckinghamshire Council Call for Sites exercises have identified 1,000 sites, and the increase in minimum housing need identified by the revised standard methodology.

We note the intention in Part A of the Plan is for the housing requirement in the plan to meet housing need in full, and the options identified to meet this; discussions about phasing; and the response to them in the Sustainability Appraisal. We agree this plan is high level and significant work needs to be done to identify which combination of options would deliver this.

We will continue work to date with Buckinghamshire on strategic liaison to influence this decision to support Slough's evidence base findings that promote housing need being met where it arises (shared with Buckinghamshire, including the Berkshire Strategic Housing Market Assessment report 2016, Report on the Northern Expansion of Slough 2017, and the Wider Area Growth Study or 'WAGs' in 2019 and 2022).

We note the 2025 five year housing land supply calculation for the South Planning Area that includes Chiltern and South Bucks lies at 0.91 yrs supply, and consider if the findings of the WAGs still apply that this is impacting Slough residents' ability to access housing (Slough's 25/26 is calculated at 2.5yrs land supply).

As such SBC will work with Buckinghamshire Council on allocating sites early in the plan period that can help direct need to where it arises, particularly where site allocations may have cross-boundary implications for Slough and the 5YLS within its housing market area.

SBC also seeks early engagement on how the increased housing need will be addressed spatially and phased over the plan period to meet the higher housing requirement to meet the step change in housing need throughout the plan period. SBC recognises the commitment to time to deliver new settlements and cross boundary solutions, that the draft Local Plan is still evolving, and that the absence of specific site proposals limited the Sustainability Appraisal's ability to fully assess cross-boundary impacts and solutions.

SBC notes the options proposed for allocating housing sites- including growth around existing settlements, employment hubs and transport corridors, and the reference to work with Slough on this. We agree this aligns with sustainable development principles, and SBC considers that further testing of cross-boundary commuting and housing market interactions including along the A355/A412 corridor, will enable spatial distribution decisions to be based on up to date evidence sound.

Housing and employment supporting infrastructure over the plan period

Slough is part of a wider functional housing market area with strong commuting links into and from Buckinghamshire. To ensure a balanced and effective housing strategy, it is essential that housing mix policies are informed by coordinated evidence across administrative boundaries. This will help housing types and tenures take a strategic approach to meeting housing needs.

Slough's emerging HELAA and LHNA will assess affordability pressures. To meet the Duty to Cooperate, it is important that consistent methodologies and shared assumptions are used across local authorities. This will ensure that affordable housing needs are robustly assessed and transparently planned for.

There are strong commuting and labour market flows between Slough and Buckinghamshire, and a coordinated strategic planning will enhance economic resilience and support shared growth objectives.

- *Housing Requirement, Need and infrastructure*

We note the plan identifies housing need for 95,500 homes by 2045 (a 43% increase over 2021 levels), and that the requirement target includes 22,000 allocated in plans to date within this, with the final requirement allocation target of 69,000.

SBC considers the current 5 year housing land supply shortfall, and meeting additional growth in the first 5 years of the plan period will have proportionate implications for local infrastructure, commuting patterns and the housing markets area that includes Slough. This reinforces the need for cross-boundary collaboration on growth distribution and infrastructure planning early in the plan period.

SBC do also welcome the scope created by Buckinghamshire Council's flexible approach to spatial options and the phased delivery of a new settlement later in the plan period. This provides scope for housing supply to meet need more sustainably across the wider area across LPA boundaries, and settlement expansion or creation that responds to travel to work and housing drivers for our local residents and businesses.

- *Housing Market Area and Employment Land Relationships*

SBC seeks confirmation that evidence base and decisions based on it will be considered by Buckinghamshire Council in addressing cross-boundary housing market and employment labour supply dynamics, particularly with Slough, Windsor and Maidenhead, and the employment sectors within them and the wider Thames Valley area (such as offices, warehousing, aviation, minerals, waste and datacenter related land supply and utility needs).

- *Employment Needs and Supply Strategy*

Buckinghamshire Council's plan includes strategic employment sites. SBC wishes to understand how these relate to regional employment strategies, sector demand, labour market dynamics and commuting flows, particularly where strategic employment growth may influence infrastructure demand or cross-boundary travel patterns with Slough.

Slough will work with Buckinghamshire on the suitable allocation of employment sites or housing around these, and may be informed by the proposals to meet needs for Slough in Slough's local plan in line with the 'travel to work area' identified in the Economic Development needs – eastern Berkshire 2016, or any update to that or evidence work.

Gypsy, Traveller and Travelling Showpeople

SBC notes the need identified for Gypsy and Traveller sites and pitches across Buckinghamshire over the plan period, and the call for sites to meet this. SBC is currently commissioning its own Gypsy and Traveller Accommodation Assessment and will work with Buckinghamshire to support cross-boundary accommodation needs being addressed 'soundly' as SBC are aware traveller households can move across administrative boundaries, and there currently allocated sites that cross the boundary between Slough and Buckinghamshire.

Green Belt and Strategic Planning

Given the proximity to Slough and the potential for development pressures near administrative boundaries, it is important that Green Belt policies are coordinated to

maintain strategic gaps, protect landscape character, and support consistent decision-making across borders.

- *Green Belt Review*

SBC notes that Buckinghamshire Council is undertaking an update to the Green Belt Assessment funded by Government following changes to the NPPF in 2024. We note Slough invited Buckinghamshire to include Slough Borough area within its scope, and accept the reasons it declined.

Slough will therefore engage directly, but also via the Royal Borough of Windsor and Maidenhead (RBWM) as they are leading on procurement of a joint study for four Berkshire Local Planning Authorities. We note that RBWM have responded to date on the proposed grey belt assessment and settlement methodology. RBWM will invite Buckinghamshire to engage on the Berkshire process as appropriate to meet DtC and Soundness requirements. We note the work may result in allocations that alter settlement boundaries, designation as towns, and releases from Green Belt through the Local Plan process.

SBC stresses the importance of coordinated strategic planning of Green Belt to avoid loss from speculative applications, and Slough places additional importance on the Green Belt in Colnbrook and Poyle that is designated Strategic Gap and Colne Valley Regional Park. Slough will work with Buckinghamshire to address the Colne Valley Regional Park and note Buckinghamshire place strategic importance on preservation of the Chilterns National Character Area.

Infrastructure and Transport

There are significant cross-boundary commuting patterns between Buckinghamshire and Slough, particularly along key corridors such as the A4, M4, and rail links , expansion at Heathrow (and the Western Rail Access) . Incorporating these movements into transport modelling will help ensure that infrastructure capacity, investment priorities, and mitigation measures are aligned with real-world travel behaviour. This will also support sustainable growth, reduce congestion, and improve connectivity across the wider sub-region, in line with the Duty to Cooperate.

These nationally significant infrastructure projects offer opportunities to improve regional accessibility and support sustainable growth. SBC encourages joint planning to align employment, housing, and transport strategies.

Air quality impacts often extend beyond administrative boundaries, particularly along strategic transport corridors. Joint monitoring and mitigation strategies are essential to protect public health and meet national air quality objectives.

Slough is a major logistics hub. Coordinated planning is needed to manage HGV movements, reduce congestion, and mitigate environmental impacts across local authority boundaries.

- *Infrastructure Planning*

SBC notes that Buckinghamshire Council acknowledges the need for infrastructure to support growth across the area and over the plan period and will work with Buckinghamshire to address strategic cross boundary effects including on transport, health, and utilities.

SBC highlights the importance of aligning infrastructure delivery timelines with housing and employment growth and requests early dialogue on assumptions, particularly where corridor improvements or growth distribution could influence on transport modelling, travel demand and public transport connectivity towards Slough, energy and decarbonisation infrastructure to support proposed growth, and potential grid capacity and renewable energy generation opportunities.

SBC notes that strategic growth will have implications for waste management capacity and safeguarded mineral resources. SBC requests engagement with Buckinghamshire Council as Waste and Minerals Authority to ensure cross-boundary resource planning and safeguarding are appropriately aligned.

Additional Strategic Themes

- *Climate Change, flood risk and Environmental Resilience*

SBC recognises the importance of climate adaptation and mitigation in strategic planning and requests clarification on how Buckinghamshire Council intends to address climate resilience, flood risk

SBC notes that parts of South Buckinghamshire share hydrological catchments with Slough and the wider Thames Valley and requests early engagement on flood risk management and drainage strategy development, particularly where growth proposals could affect fluvial or surface water flood risk across administrative boundaries. SBC encourages alignment with the Environment Agency's updated Thames Valley Flood Risk Management Plan to ensure consistent strategic mitigation and investment planning.

- *Water Supply and Infrastructure Capacity*

SBC notes that water stress and infrastructure capacity are emerging constraints in the Thames Valley region. SBC seeks assurance that Buckinghamshire Council is assessing water supply, wastewater treatment, and utilities infrastructure in relation to proposed growth and encourages cross-boundary coordination on these matters.

- *Biodiversity and Burnham Beeches Special Area of Conservation (BBSAC)*

Shared green infrastructure corridors, such as river valleys, woodland belts, and recreational routes play a vital role in supporting biodiversity, managing flood risk, and enhancing access to nature. Their effectiveness depends on joined-up planning and long-term stewardship across local authority areas

The Colne Valley is a key strategic green corridor shared by Slough and Buckinghamshire. Coordinated planning is essential to protect its landscape, ecological value, and recreational function.

SBC will continue to engage on the BBSAC , and on biodiversity net gain where cross-boundary impacts may arise.

SBC welcomes Buckinghamshire Council's commitment to nature recovery and biodiversity net gain and requests engagement on cross-boundary ecological corridors and green infrastructure where strategic growth could deliver benefits to the Colne Valley Regional Park, and Berkshire's Local Nature Recovery Network.

SBC are working with Natural England to provide a 'SANG' for Burnham Beeches SAC within Slough. We note Buckinghamshire are also reviewing the mitigation strategy for Burnham Beeches, which may result in a requirement for 'SANG' and 'SAMB'. We note there is currently an inconsistent mitigation approach between the former district areas of Buckinghamshire due to different Local Plans, and the aspiration for the new Local Plan for Buckinghamshire to standardise the approach across the catchment area. Slough will work with Buckinghamshire to address mitigation, noting there may be an opportunity to provide mitigation in the form of SANG which benefits both Buckinghamshire and Slough BC

- *Digital Infrastructure and Economic Connectivity*

SBC acknowledges the strategic importance of digital infrastructure as a driver of economic growth and connectivity. SBC supports collaboration on assessing and regional digital infrastructure investment, including full-fibre rollout, smart technologies and improved connectivity in rural areas. SBC encourages early engagement on how digital infrastructure priorities and wider economic growth corridors, such as the Innovation Spine, Aylesbury–Milton Keynes axis and the Western Rail Link to Heathrow, may influence regional employment patterns, labour markets, and commuting flows between Buckinghamshire and Slough.

Slough agree in principle but consider that the general topic areas need more detail: that should include for example reference to Heathrow and The Western Rail link are part of infrastructure, and Cross boundary working to meet housing needs across the sub-region is part of housing (WAGS); and transport includes bus, walking and cycle strategies; water includes contamination, supply, and flooding

- *Health and Social Infrastructure*

SBC highlights the potential impact of housing growth on health services and social care and requests engagement with NHS and social care providers to assess cross-boundary service implications and ensure coordinated infrastructure planning. SBC considers that the preparation of a Statement of Common Ground could support coordinated engagement with the NHS and social care providers, helping to formalise shared infrastructure priorities and ensure alignment across boundaries. SBC also seeks engagement with Buckinghamshire Council and education authorities to understand the implications of growth for school capacity and workforce skills across the sub-region.

- *Statements of Common Ground*

SBC supports the use of Statements of Common Ground to formalise shared strategic matters. SBC will progress the signing of the current SoCG and initiation of a new one to demonstrate compliance with the Duty to Cooperate and facilitate constructive engagement.

- *Supplementary Planning Documents (SPDs)*

SBC notes that Buckinghamshire Council is preparing SPDs to support legacy Local Plans. SBC requests clarification on whether any of these SPDs may have cross-boundary implications and whether neighbouring authorities will be consulted during their preparation.

- *HELAA Methodology and Site Assessment*

SBC notes that Buckinghamshire Council is assessing over 1,000 submitted sites using its Housing and Economic Land Availability Assessment (HELAA) methodology. SBC is currently undertaking its own HELAA as part of the evidence base for the emerging Slough Local Plan. SBC welcomes opportunities to share findings and compare methodologies with Buckinghamshire Council, particularly where site assessments may have cross-boundary implications or inform joint strategic planning.

Recommended Milestones, Triggers and Strategic Outcomes

To support effective cross-boundary engagement and ensure strategic matters are progressed constructively, SBC will engage with Buckinghamshire to align with Buckinghamshire Council's published LDS, and SBC's emerging plan, noting Government changes may impact this. We consider this is needed to show Plan Preparation, Regulation 19 Consultation and Submission & Examination, have addressed strategic matters appropriately, and at appropriate points in the plan-making process, with visibility of outcomes and governance.

Effective monitoring of cross-boundary issues is essential to ensure that strategic objectives are being met and that any emerging pressures or unmet needs are identified early.

This will support adaptive plan-making, enable timely responses to shared challenges, and help demonstrate compliance with the Duty to Cooperate.

Slough Borough Council will work to encourage regular engagement with neighbouring authorities to support transparent and coordinated delivery.

SBC Comments Summary

- SBC supports Buckinghamshire Council's proactive approach to plan-making and consultation.
- SBC requests ongoing engagement under the Duty to Cooperate, especially on housing, employment, and Gypsy and Traveller needs.
- SBC seeks clarity on cross-boundary impacts and infrastructure planning.
- SBC encourages transparency in technical studies (e.g. HEELA, Green Belt, site allocations) and their implications for neighbouring authorities.
- SBC highlights the importance of coordinated approaches to climate resilience, water infrastructure, digital connectivity, and health and social care.
- SBC proposes early preparation of a Statement of Common Ground to formalise shared strategic matters and support constructive engagement.
- SBC has had regard to Buckinghamshire Council's published LDS when proposing engagement milestones and timeframes. These are aligned with key LDS stages, such as, Plan Preparation, Regulation 19 Consultation, and Submission & Examination, and may be adjusted to reflect future updates to the LDS to ensure timely and coordinated input.
- SBC looks forward to engaging further as site options and infrastructure priorities are refined, including through Statements of Common Ground and joint technical studies where appropriate.

SBC looks forward to continued engagement with Buckinghamshire Council via our Duty to Cooperate meetings as the Local Plan progresses and welcomes opportunities to collaborate on shared strategic matters through joint evidence, Statements of Common Ground and coordinated infrastructure planning.

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