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Royal Borough  
of Windsor &  
Maidenhead

# ROYAL BOROUGH OF WINDSOR AND MAIDENHEAD

## HOUSING TOPIC PAPER 2019

OCTOBER 2019

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# 1. INTRODUCTION

## **Purpose of this document**

- 1.1 This Housing Topic Paper forms part of the evidence base underpinning the Borough Local Plan 2013-2033 Submission Version (BLPSV), and in particular, the changes being proposed to the plan in October 2019. The version of the BLPSV that includes the proposed changes is hereafter referred to as the BLPSV-PC.
- 1.2 The purpose of the paper is to support the BLP at examination and to provide further detail on the proposed changes to the BLPSV relating to housing that have arisen from the work the council has undertaken to address the Inspector's questions set out in ID/07 and ID/09v2.
- 1.3 The paper provides background information and explains the processes that have been undertaken in reaching the policies set out in the BLPSV-PC. It does not contain any policies, proposals or site allocations.

## **Document Scope**

- 1.4 The main areas covered by the Topic Paper are:
  - Housing need
  - Housing target
  - Housing trajectory and phasing
  - Site selection
  - Housing distribution
  - Housing mix
  - Affordable housing need
  - Housing for specific groups
  - Housing delivery
  - Suitable Alternative Natural Greenspace
- 1.5 As the BLPSV was submitted for in January 2018 it is subject to transitional arrangements and is being examined under the provisions of the National Planning Policy Framework 2012 (NPPF) and under the relevant Planning Practice Guidance (PPG) in place at the time of the submission. Where relevant, more recent provisions contained in the NPPF and PPG have been referred to but, unless otherwise stated, references to the NPPF are made in relation to the 2012 version.

1.6 This Topic Paper supersedes Chapter 5 of the Updated Shaping the Future Topic Paper, January 2018.

## 2. HOUSING NEED

### **Berkshire (including South Bucks) SHMA (2016)**

- 2.1 The NPPF requires local authorities to ‘have a clear understanding of housing need in their area’ and that they should prepare a Strategic Housing Market Area (SHMA) to ‘assess their full housing needs’.<sup>1</sup> To take account of updated information, and to fully understand the housing need on a strategic scale the 6 Berkshire LPAs and the Thames Valley LEP commissioned consultants GL Hearn to prepare a SHMA for the period 2013-2036. This position is supported by the PPG, which encourages an assessment of development needs across local authority areas in line with the duty to cooperate.<sup>2</sup>

### **Housing Market Areas**

- 2.2 The 2016 SHMA reviewed Housing Market Area (HMA) geographies by taking account of the three sources of information outlined in the PPG<sup>3</sup>:
- House prices and rates of change in house prices;
  - Household migration and search patterns; and
  - Contextual data (for example travel to work area boundaries).
- 2.3 A best fit approach was taken that determined there were two separate HMAs which together contained the Berkshire authorities and South Bucks. A Western Berkshire HMA was identified consisting of Bracknell Forest, Wokingham Borough, Reading Borough, and West Berkshire. The remaining authorities (Slough Borough, the Royal Borough of Windsor and Maidenhead and South Bucks) were contained in an Eastern Berkshire and South Bucks HMA. The SHMA acknowledged the strong links between RBWM and Bracknell Forest, and the need to work jointly between the Eastern and Western HMAs. Figure 5.1 below shows the geography of the two HMAs.
- 2.4 Soon after the publication of the Berkshire (including South Bucks) SHMA, South Bucks resolved to prepare a joint plan with Chiltern District Council and indicated that it did not consider themselves to be part of the Eastern Berkshire HMA. Instead South Bucks argued that a ‘best fit’ approach for the South Bucks/Chiltern whole plan area was the Buckinghamshire HMA/FEMA comprising of the whole of Aylesbury Vale, Chiltern, South Bucks and Wycombe. Since 2017 the two authorities have been preparing a joint plan based on the national standard methodology for calculating local housing

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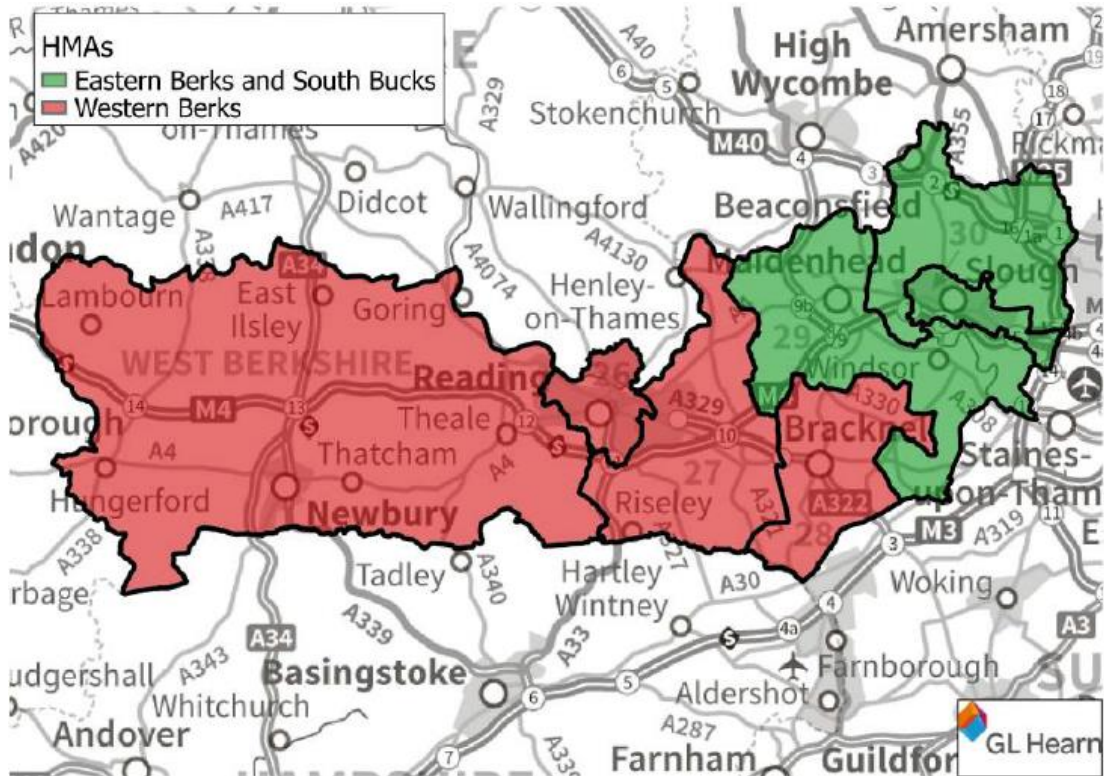
<sup>1</sup> Berkshire (including South Bucks) SHMA (2016): 17; NPPF: 159

<sup>2</sup> PPG Paragraph 007 (ID: 2a-007-20150320)

<sup>3</sup> PPG Paragraph 011 (ID2a-011-20140306)

need, rather than on an OAHN/HMA process. The Chiltern and South Bucks Local Plan 2036 was submitted to the Secretary of State on 26 September 2019 for examination.

**Figure 5.1: HMAs<sup>4</sup>**



2.5 RBWM continues to support the position of the Berkshire (including South Bucks) SHMA (2016) and contends that South Bucks should be working closely with Slough and RBWM to deal with unmet housing need in the area covered by the local authority areas of RBWM, South Bucks and Slough.<sup>5</sup> This is due to the close geographic relationship between RBWM, South Bucks and Slough, and based on the best fit Eastern Berkshire HMA evidence. To date, this remains an unresolved issue between RBWM, Slough and South Bucks. Details of the nature and scope of this disagreement is set out in the Council’s Duty to Co-operate Compliance Statement which can be viewed at:

[https://www3.rbwm.gov.uk/info/200209/planning\\_policy/1339/duty\\_to\\_cooperate](https://www3.rbwm.gov.uk/info/200209/planning_policy/1339/duty_to_cooperate)

2.6 Intensive Duty to Co-operate working from 2016 onwards has been undertaken in relation to this matter and RBWM, Slough, and Chiltern and South Bucks councils have been jointly working on a government funded Wider Area Growth Study (WAGS) to address longer term future development needs (including housing) across a sub-

<sup>4</sup> Berkshire (including South Bucks) SHMA (2016): 18

<sup>5</sup> Slough Borough Council has also taken this position in their Issues and Options consultation (2017)

regional area. Further information about the WAGS work, and the outcome of the first stage of the study can be viewed at:

[https://www3.rbwm.gov.uk/info/201039/non-development\\_plan/1339/duty\\_to\\_co-operate/2](https://www3.rbwm.gov.uk/info/201039/non-development_plan/1339/duty_to_co-operate/2)

## **Objectively Assessed Housing Need (OAHN)**

- 2.7 The full objectively assessed housing need (OAHN) for RBWM is set out in the 2016 SHMA. For the period 2013 – 36 the SHMA identifies an OAHN of 712 dpa for the borough. For the plan period 2013 – 2033 this amounts to a total housing requirement of 14,240 net new dwellings. The SHMA did not take into account constraints on housing supply such as land supply and development constraints. Details on how the final 2016 OAN figure was calculated is set out in the SHMA. Appendix A of this Paper provides a summary with further interpretive analysis.

### UPDATING THE 2016 OAHN

- 2.8 The final OAN of 712 dpa was based on the 2012-based household projections (657 dpa) with an improvement to address local affordability (8.3% of 55 dpa). At the time of writing 2016-based household projections had been published which over the plan period show a growth of 346 households across the 2013-36 period. To this a further 4.4% adjustment has been made for vacancy, taking the demographic need to 361 dpa - considerably less than those of the 2012 based projections.
- 2.9 However, the Council have run as a sensitivity test using the 2014-based household projections. The 2014-based household forecasts show a household growth of 545 per annum across the 2013-36 period. Applying a 4.4% vacancy rate would take this figure to 569 dpa.
- 2.10 However, it is possible that these figures show an over-estimation of demand. As the table below sets out, the subsequent editions of the Sub-National Population Projections (SNPP) have reduced the expected 2018 population of RBWM. When compared to the most recent population estimate the 2016-based SNPP are the most accurate.



	2012-based SNPP	2014-Based SNPP	2016-based SNPP	2018 MYE
RBWM 2018 Population	153,100	151,400	150,600	150,900

Source: ONS

- 2.11 However, the 2016-based SNPP are also unlikely to provide the requisite labour supply to meet RBWM’s economic potential. Therefore, use of the 2014-based SNPP may be more appropriate. At 545 dpa or 569 dpa with the vacancy rate, the 2014-based household projections are still somewhat lower than the 657 dpa in the SHMA.
- 2.12 As there is only a 3 dpa difference between the higher end adjustment and the Local Plan figure it has been concluded that 712 dpa remains an appropriate housing need figure for the Borough over the 2013 – 2033 period even when taking into account:
- more recent demographic evidence and addressing criticism of them;
  - more recent assessments of economic growth; and
  - a revised approach to market signals including potentially stronger responses.
- 2.13 By maintaining the need of 712 dpa, this would also provide the homes and jobs balance as established in the SHMA. As a result, there is no need to revisit the jobs growth as set out in the Local Plan.

## Use of the Standard Method

- 2.14 The PPG previously defined the need for housing in the context of the scale and mix of housing and the range of tenures likely to be needed in the HMA over the plan period.<sup>6</sup> At the time that the BLPSV was submitted, no fixed methodology was provided in the PPG for assessing Housing Need. However, since then, the Ministry of Housing Communities and Local Government (MHCLG) has adopted a new standard method for calculating housing need. The revisions were adopted by Planning Practice Guidance (PPG) in February 2019.
- 2.15 Paragraph 214 of the revised NPPF (2019) states that any plans submitted after the 24th of January 2019 should be based on the standard methodology. As the Council submitted the BLPSV prior to the 24th of January the revised framework does not necessarily apply. That said, in order to ensure the BLP’s longevity, the Council engaged GL Hearn to assess the potential impact of potentially adopting the standard

<sup>6</sup> PPG Paragraph 003 (ID: 2a-003-20140306)

method for calculating housing need in the Borough. While there is no need for the Council to adopt this approach, it was felt important to use it as a further cross check to the robustness of the 2016 OAHN assessment of housing need in the borough over the Plan period.

- 2.16 Based on a capped 40% uplift on a household growth of 543 dpa, the standard method results in a need for 761 dpa over the 2019 period onwards (i.e. to 2033 or 2036).
- 2.17 This figure is notably higher than the 712 dpa calculated within the SHMA. However, as the PPG sets out, the standard method calculation “addresses projected household growth and historic under-supply”, which the 712 dpa figure does not.
- 2.18 For clarity, the standard method effectively ‘wipes the slate clean’ when it comes to backlog of housing delivery. Paragraph 11 of the PPG (2019) explains, “The affordability adjustment is applied to take account of past under-delivery. The standard method identifies the minimum uplift that will be required and therefore it is not a requirement to specifically address under-delivery separately”.
- 2.19 While this doesn’t change the housing need, it does change the supply response which must take account of under-delivery in the 2013-2019 period. In total, that period required delivery of 4,272 dwellings (712 x 6). However, only 3,286 have been delivered, equating to a shortfall of 986 dwellings.
- 2.20 If this need is redressed over the remaining 14 years of the plan period, then an additional 71 dpa must be added to the base need of 712 dpa. This addition results in a residual target over the 2019-33 period of 782 dpa.
- 2.21 This new sum therefore exceeds the standard methodology (761 dpa) on a per annum basis by 21 dwellings, albeit the overall number is smaller as the residual period is three years shorter.
- 2.22 To conclude, whether the Council adopts the Standard Method, which it is considered it should not, or whether the Council updates the housing need calculations, which is reasonable but largely academic, it results in the same supply position as now or 21 dpa lower.
- 2.23 Given the amount of work which has already been undertaken to get to this point it would be an unnecessary waste of time and resources for the BLPSV-PC to diverge from the position of the BLPSV as outlined in the ‘Shaping the Future’ topic paper (2018).

## AFFORDABLE HOUSING NEED

- 2.24 The market signals in RBWM have not improved since the last SHMA, which made an 8.3% adjustment to the overall need. The key test (as per the current PPG) is the workplace based median affordability ratio, which has deteriorated from 9.93 in 2013 to 13.16 in 2018.
- 2.25 Perhaps more importantly, there have been a number of inspectors who have accepted and indeed expected a greater adjustment in response to market signals. We would therefore recognise that a greater response is perhaps now required.
- 2.26 Under the previous PPG there was no guidance as to the extent of the uplift other than it is to set “at a level that is reasonable”. Adding that with the more significant the constraint the larger the supply response. Typically, these uplifts are in the region of 10% to 20%, but could be as high as 25%, such as in Waverley and even 30% in Cambridge.
- 2.27 If we are to apply these various uplifts to demographic need of 545 dpa, bearing in mind that the PPG (2019) suggest “The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals”, then the resultant housing need would be:
- 8.3% = 590 dpa
  - 10% = 600 dpa
  - 20% = 654 dpa
  - 25% = 681 dpa
  - 30% = 709 dpa
- 2.28 Notwithstanding the differences in Cambridge and RBWM housing markets and whether a 30% uplift is appropriate in RBWM, by applying this uplift the OAN in RBWM increases to 709 dpa, which is a broadly similar figure to the current housing target 712 dpa.

### **3. HOUSING TARGET**

- 3.1 The Council has the responsibility of setting its own housing target based on an understanding of housing need and other factors. Government policy is that local planning authorities should positively seek opportunities to meet development needs of their area and wider opportunities for growth. Authorities are strongly encouraged to meet objectively assessed market and affordable housing needs in full, unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against policies of the framework as a whole.
- 3.2 The OAN is seen as the starting point for determining a housing target but the following factors also need to be taken into account before a target can be set for the plan period:
- Constraints, as identified by the NPPF;
  - Wider policy objectives and priorities;
  - Available land supply;
  - Cross boundary unmet need.
- 3.3 The previous section identified the justifications for using the OAN as the starting point for the Borough's housing target. The following sections consider the other factors that were taken into account in determining the Borough's housing target for the 2013 – 2033 plan period.

#### **Constraints and wider policy objectives and priorities**

- 3.4 In the BLPSV the Council has committed to meeting its housing and employment needs in full. The Oct 19 proposed changes to the BLPSV do not alter this intention.
- 3.5 The 2018 Shaping the Future Topic Paper sets out the Council's approach to the development of the Borough over the plan period, how this strategy has evolved and been informed by other relevant strategies and objectives. Corporately the Council recognises the importance of increasing housing supply, and particularly affordable housing. However, as noted previously the constrained nature of the Borough limits the number of sites that are deliverable, despite pursuing higher density development in sustainable locations.

## Available Housing Land Supply

- 3.6 The Council's ability to meet housing need is largely determined by the supply of housing sites available for development in the plan period. Paragraph 159 of the NPPF requires the Council to regularly assess its housing supply in the form of a Strategic Housing Land Availability Assessment (SHLAA).
- 3.7 The SHLAA is expected to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.
- 3.8 The supply of housing is formed by a number of categories that together provide, and are proposed to increase the supply of housing in the Borough. This includes sites identified in the SHLAA, proposed allocations in the BLPSV-PC, windfall allowance, permitted development, and those sites that already have planning permission (commitments). The Council has sought to maximise housing supply on sites where appropriate, particularly on areas of previously developed land in sustainable locations, including those in public ownership. Despite these efforts to maximise supply on previously developed sites, the release of some Green Belt sites has been necessary to meet the housing need identified. Each of these sources of supply is considered in more detail below.

### SHLAA SUPPLY

- 3.9 To provide a standardised approach to undertaking assessments a joint methodology was agreed between five of the six Berkshire authorities. This methodology was subject to consultation between May-June 2016 and forms the basis for site assessment work across the authorities.<sup>7</sup>
- 3.10 The Council has undertaken a number of Strategic Housing Land Availability Assessments over the plan-making process. The remainder of this section considers the findings of the Borough's most recent SHLAA study – the HELAA 2019.
- 3.11 The HELAA 2019 commenced with a formal 'Call for Sites' in the Spring of 2019. Table 3.1 shows the estimated number of net dwellings that the 250 housing sites that were not excluded in Stage 1 of the HELAA are anticipated to deliver:

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<sup>7</sup> Berkshire HELAA Methodology available from:  
[https://www3.rbwm.gov.uk/downloads/download/226/housing\\_and\\_economic\\_land\\_availability\\_assessment](https://www3.rbwm.gov.uk/downloads/download/226/housing_and_economic_land_availability_assessment)

Table 3.1: HELAA site deliverability classification

Deliverability Classification	Net Dwellings
<b>Deliverable (1-5 years)</b>	2,925
<b>Developable</b>	1,870
<b>Potentially Developable</b>	11,816
<b>Total</b>	<b>16,611</b>

Source: RBWM HELAA (2019)

- 3.12 The supply position set out in the HELAA (2019) is indicative. It is based on assumptions made regarding the developable area, capacity, density and constraints of sites using the information available at the time of assessment. This includes information and technical studies submitted by developers and landowners, technical studies by the Council, and any other information considered relevant. When brought forward, the final number, type, and mix of dwellings will be determined through the planning application process.
- 3.13 Due to the indicative nature of the site supply, the Council has considered whether it would be appropriate to assume that all of the identified SHLAA sites will 1) come forward, and 2) come forward in the anticipated manner over the plan period.

#### WINDFALL ALLOWANCE

- 3.14 Paragraph 48 of the NPPF advises that a windfall allowance may be justified in the five year supply if a local planning authority has compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. It adds that such an allowance should be realistic, having regard to the SHLAA, historic delivery rates and expected future trends, and should not include residential gardens.

#### **Historic windfalls**

- 3.15 Windfall from small sites have provided a consistent level of housing supply in the Borough over a prolonged period. Table 3.2 below shows that in the period 2006/07 to 2018/19 development on small sites has been a consistent and significant source of residential land supply in the Borough. Over this period 2,285 completions have occurred on small sites (42% of all completions).

Table 3.2: Net Housing Completions

Completions 2006/07 to 2018/19														
	2006/07	2007/08	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	Mean
<b>Sites &gt;=0.25Ha</b>	201	202	343	228	107	62	143	226	348	414	297	199	409	<b>245</b>
<b>Sites&lt;0.25Ha</b>	158	246	131	123	83	115	50	134	166	188	285	310	296	<b>176</b>
<b>Total</b>	359	448	474	351	190	177	193	360	514	602	582	509	705	<b>421</b>

#### **Future windfalls – Small Sites**

- 3.16 Table 3.2 shows that an average of 176 housing units are completed each year within the Borough on small sites. Over the remaining plan period that would equate to around 2,100 housing units. Whilst this number is high, it is clear that the completions on small sites within the Borough have remained relative constant (aside from the years following the economic crash of 2008). That being the case, the Council considers it reasonable to presume that the windfalls will continue to make a realistic contribution to the housing requirement for the remainder of the plan period. There is also no reason to suggest that this level of development on windfall sites will decline substantially below the mean.
- 3.17 That said, the NPPF states that any windfall allowance included in the five year housing land supply should not include residential gardens. As per the Council’s most recent Authority Monitoring Review (2018), 25% of the total completions on small sites have taken place on residential garden land. When a 25% reduction is taken into account, the mean completion rate on small sites over the past 12 years would equate to 131 dpa. When extrapolated across the remainder of the plan period, minus the next three years to avoid double counting with existing planning permissions, this would equate to around 1,441 housing units (131 x 11 years for the period 2022-23 to 2032-33).
- 3.18 It is worth noting that this equates to a reduction in the number of housing units anticipated through small sites windfall when compared to the previously calculated figures included within the ‘Shaping the Future’ Updated Topic Paper (2018) of 1840 units over the plan period.

#### **Future windfalls – Large Sites**

- 3.19 The potential delivery of housing from large windfalls in the Local Plan has been estimated in the HELAA 2019 by averaging the number of dwellings that have come from unidentified large sites each year from 2006 (excluding development on residential gardens) and then applying this number from Year 11 in the plan period.
- 3.20 Although the HELAA 2019 attempts to identify all sites that have the potential for new housing in the plan period, the HELAA captures a moment in time and there will always be sites that have not yet been identified that could become suitable, available and achievable for housing within the life-cycle of the BLPSV-PC.
- 3.21 However, in order to avoid any double counting with the sites that have been identified in the HELAA 2019, and in order to adopt a more cautionary approach, no contribution from housing on large windfall sites has been factored into the housing supply until the last three years of the plan period.
- 3.22 Since 2006, an average of 245 dpa have come forward within the Borough on large sites. That would equate to 735 new housing units over the last three years of the plan period. However, as there is a large degree of uncertainty in the calculation of future supply from unidentified sites, for the purposes of the BLPSV-PC, the 735 figure has been discounted by 15% to 624 homes.

***Total windfall supply***

- 3.23 The total number of homes in the BLPSV-PC that are estimated to come forward from windfall sites is 2,065 dwellings. Concerns were expressed through the Regulation 20 representations that windfall allowance comprises too much of the Council's overall housing supply to meet its housing requirement. However, the Council has consistently delivered a high number of windfall sites and, as can be seen from the above explanation, the figure of 2,065 has been derived from historical data and a cautious approach.

PERMITTED DEVELOPMENT

- 3.24 The government announced changes to permitted development rights to allow conversions of B1 (a) office to C3 residential use. In March 2016 the Secretary of State announced that the changes would be made permanent. This is subject to Prior Approval being sought in respect of flooding, contamination, highways and transport issues, and the impacts of noise from commercial premises on the intended occupiers of the development. All development must be completed within three years starting with the prior approval date. Additional amendments allow the change of use of B8



storage and distribution, agricultural buildings and B1(c) light industrial use to C3 residential.<sup>8</sup>

*Table 3.3: B1 (a) office to residential (C3) completions*

Year	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19
<b>Number of units</b>	0	27	31	78	127	135

- 3.25 Commitments data shows that Prior Approval notifications have now been granted for an additional 276 units that could be completed in the years 2019/20 onwards. Additional supply from prior approval notification to residential conversions not already committed is anticipated to be low because the Council intends to introduce an Article 4 direction to remove permitted development rights for office to residential conversions. For this reason no allowance has been made for additional prior notifications in the housing land supply moving forwards.

### Completions and Commitments

- 3.26 Housing completions since the start of the plan period (2013) provide a further source of supply. In the period 2013 – 2019 3,286 dwellings were completed.

*Table 3.4: Housing permissions and outstanding commitments trends*

HOUSING TRENDS	2006/07	2007/08	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19
<b>COMMITMENTS</b>	-	-	-	-	-	-	-	17	210	90	105	651	118
<b>NET COMPLETIONS</b>	359	448	474	351	190	178	193	360	514	608	584	515	705

### CURRENT TOTAL HOUSING SUPPLY

- 3.27 The current housing supply position is set out below in Table 3.5. It takes into account the site supply outlined above.

<sup>8</sup> Further information available from the Planning Portal: [https://www.planningportal.co.uk/info/200130/common\\_projects/9/change\\_of\\_use/2](https://www.planningportal.co.uk/info/200130/common_projects/9/change_of_use/2)

Table 3.5: Total housing supply 2013 – 2033

Category	Amount
Completions	3,286
Commitments	3,193
Windfall Allowance	2,065
Proposed Allocations	7,891
<b>Total</b>	<b>16,435</b>

## Maximising Supply

3.28 Local authorities are expected to make every effort to meet their full development needs arising from the Borough. The NPPF provides strong direction in this respect:

- At the heart of the NPPF is a presumption in favour of sustainable development that for plan making means local planning authorities should positively seek opportunities to meet development needs of their area, unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed the NPPF, or be contrary to specific NPPF policies. (Paragraph 14)
- One of 12 core planning principles of the NPPF<sup>9</sup> is that ‘Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and response positively to wider opportunities for growth.’
- ‘To boost significantly the supply of housing local planning authorities should:
  - Use their evidence base to ensure that their Local Plan meets in full the objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period.’<sup>10</sup>
- When submitting plans for examination local planning authorities should consider the plan to be ‘sound,’ of which a qualifying criteria is being ‘positively prepared.’ The NPPF states that this means the ‘plan should be prepared based on a strategy which seeks to meet objectively assessed development and

<sup>9</sup> NPPF: 17

<sup>10</sup> NPPF: 47

infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so.<sup>11</sup>

- 3.29 Paragraph 79 of the NPPF sets out the high level of importance the government attaches to Green Belts. In response to these requirements the Council has considered all options to increase its site supply outside of green belt areas. These have included making effective use of suitable brownfield sites, increasing densities, using Council owned land and garden land where appropriate.

#### MAXIMISING THE USE OF BROWNFIELD LAND

- 3.30 The Council has sought to ensure that housing supply has predominantly been delivered on sites that have been previously developed.<sup>12</sup> This approach continues to be supported in accordance with paragraph 17 of the NPPF that encourages the effective use of land that has been previously developed (brownfield land). On a number of sites high intensity development is anticipated to capitalise on the close proximity to services, facilities and transport nodes. The spatial strategy pursues the allocation of a number of brownfield sites for housing development across the Borough that demonstrates the commitment to using previously developed land as a priority in order to protect the Green Belt.

#### MAXIMISING DENSITY

- 3.31 The HELAA 2019 sets out the approach taken to site assessment and the capacity of each site, including an assumption of density. The constrained nature of the Borough means that to limit development in sensitive locations such as areas at risk of flooding, higher densities have been pursued, particularly in urban areas. Paragraph 47 of the NPPF states that local authorities can set their own approach to housing density to reflect local circumstances. Higher density, well designed development is more suitable in highly sustainable locations such as Maidenhead town centre.
- 3.32 The capacity of sites must also consider the limits of what would be acceptable in relation to the character of an area and development constraints. Further information regarding density is included in the HELAA. The units proposed on allocated sites are approximates, and could decrease, or increase if sufficient information is supplied through the application process to justify such a position.

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<sup>11</sup> NPPF: 182

<sup>12</sup> See the Small Sites Analysis appended to the HELAA (2016)

## GREEN BELT RELEASE

- 3.33 It is clear from the above that the Council has made every effort to maximise its urban and brownfield land supply. However, despite this, the supply from non-Green Belt locations only was estimated to only provide around 60% of the OAN requirement. Such a significant shortfall was considered damaging to the local needs of residents and businesses, particularly given the mix of dwellings that urban sites could deliver. The decision to release some Green Belt was considered to present the most sustainable balance of social, environmental and economic needs.
- 3.34 The nature of the proposed Green Belt release is designed to minimise Green Belt loss both in terms in terms of quantity and quality. A small number of Green Belt sites have been identified for release in areas that make only a limited or moderate contribution to the purposes identified in the NPPF, and where other constraints were not considered to preclude development.
- 3.35 Chapter 7 of the 'Shaping the Future' Updated Topic Paper (2018) sets out in detail the matters the Council took into consideration before deciding to propose Green Belt release to help meet housing needs.

## MEETING UNMET NEED OF OTHER AUTHORITIES

- 3.36 The NPPF expects local authorities to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the **housing market area**, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period. This indicates that, where possible, authorities should consider whether they have the capacity to help meet the unmet housing needs of authorities in their HMA.
- 3.37 As noted previously, there is a long standing disagreement between the authorities identified as being within the East Berkshire (with South Bucks) HMA in relation to the geographic boundaries for working and how to deal with the unmet housing need arising in the area. Despite requests from the other HMA partners South Bucks has avoided qualifying whether or not there is a level of unmet need arising from the South

Bucks authority area. However, South Bucks and Chiltern together have put in place an agreement<sup>13</sup> to export their combined unmet need to Aylesbury Vale.

3.38 Following the receipt of Regulation 20 representations raising concerns regarding the Borough's ability to accommodate unmet need within the HMA area, RBWM have tested the Council's ability to accommodate housing need above the OAHN through the SA process.<sup>14</sup> On the basis that South Bucks/Chiltern have an agreement to export their need outside of the East Berks HMA area it was decided to test housing number options above the OAHN that were largely on an understanding of the upper and lower ranges of Slough's expected unmet need. These number options were:

- Option 5 – A revised OAN of 778dpa, as presented in the 2017 Planning for the Right Homes in the Right Places: Consultation Proposals report<sup>15</sup>
- Option 6 – The original OAN, in addition to an estimation of the lower end of Slough's expected unmet housing need of 6,000 homes; and
- Option 7 – The original OAN, in addition to an estimation of the Slough's higher end of expected unmet housing need of approximately 11,000.

A series of spatial options to accommodate these higher numbers were also generated and tested.

3.39 Table 3.5 below shows the scoring matrices for all 7 of the options tested by the SA, including Options 5 – 7 which look above the OAHN.

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<sup>13</sup> Buckinghamshire Memorandum of Understanding between Aylesbury Vale District Council, Wycombe District Council, Chiltern District Council, South Bucks District Council, and Buckinghamshire Thames Valley Local Enterprise Partnership ( July 2017)  
[https://www.aylesburyvaledc.gov.uk/sites/default/files/page\\_downloads/Bucks%20Districts%20%26%20LEP%20MOU%20FINAL%2018.7.17.pdf](https://www.aylesburyvaledc.gov.uk/sites/default/files/page_downloads/Bucks%20Districts%20%26%20LEP%20MOU%20FINAL%2018.7.17.pdf)

<sup>14</sup> 2018 Sustainability Appraisal Addendum  
[https://www3.rbwm.gov.uk/info/200209/planning\\_policy/457/sustainability\\_appraisal](https://www3.rbwm.gov.uk/info/200209/planning_policy/457/sustainability_appraisal)

<sup>15</sup> DMHCLG (2017) Planning for the right homes in the right places: consultation proposals. September 2017. Available online at: <https://www.gov.uk/government/consultations/planning-for-the-right-homes-in-the-right-places-consultation-proposals>

Table 3.5: SA scoring matrices for all 7 tested options.

Option	1 Climate change	2 Water and flooding	3 Air and noise Pollution	4 Biodiversity	5 Landscape quality	6 Cultural Heritage	7 Use of resources	8 Housing	9 Health	10 Community	11 Transport	12 Education	13 Waste	14 Economy & employment
1	0	-	-	0	0	0	+	--	+/-	+	+	+/-	0	+
2	0	-	-	0	0	0	+	--	+/-	+	+	+/-	0	+
3	0	-	-	-	-	0	-	+	+/-	+	+	+/-	0	+
4	0	-	-	-	-	0	-	++	+/-	+	+	+/-	0	++
5	-	+/-	-	--	-	+/-	-	++	+/-	+	+	+/-	-	++
5A	-	+/-	-	--	-	+/-	+	++	+	+	+	+	-	++
5B	-	+/-	-	--	--	+/-	--	++	+	+	+	+	-	++
5C	-	+/-	-	--	--	+/-	-	++	-	-	+	-	-	++
5D	-	+/-	-	--	--	+/-	-	++	+	+	+	+	-	++
6	-	+/-	--	--	--	+/-	--	++	+/-	+	+	+/-	--	++
6A	-	+/-	--	--	--	+/-	--	++	+	+	+	+	--	++
6B	-	+/-	--	--	--	+/-	--	++	-	-	-	+/-	--	++
6C	-	+/-	--	--	--	+/-	--	++	-	-	+	+/-	--	++
6D	-	+/-	--	--	--	+/-	--	++	+	+	-	+	--	-
6E	-	+/-	--	--	--	+/-	--	++	-	-	-	+/-	--	++
7	-	+/-	--	--	--	+/-	--	++	+/-	+	-	+/-	--	++
7A	-	+/-	--	--	--	+/-	--	++	+	+	-	+	--	++
7B	-	+/-	--	--	--	+/-	--	++	-	-	-	-	--	++
7C	-	+/-	--	--	--	+/-	--	++	-	-	-	-	--	++

3.40 The 2018 SA Addendum identified that the 3 options above the OAHN would be anticipated to have a variety of positive and negative impacts. Significant positive impacts on the housing and economic objectives were identified for Options 5 – 7. However, the SA noted that:

*“Achieving positive impacts on the natural environment, such as the biodiversity, landscape and natural resources objectives, are more difficult. This is primarily because the Borough has a large quantity of natural constraints, such as protected landscapes, wildlife sites designated under international and national law as well as extensive areas of previously undeveloped land. These receptors are relatively sensitive to the impacts of development.”*

3.41 Option 4 was identified as the best performing option in sustainability terms both in number and spatial terms. The Borough is not considered to have capacity to accommodate housing development above the OAN on the basis of the SA findings, the limited land supply situation, ability to delivery and provide supporting infrastructure within the time frame and most importantly, the high level of physical and absolute policy constraints affecting the Borough. These constraints include the high percentage of Green Belt and Flood Zone 3, Thames Basin Heaths SPA, SAC’s

SSSIs, and Ramsar sites, Historic Parks and Gardens and barriers such as the River Thames, Jubilee River and the M4.

- 3.42 Requests have been received from Surrey Heath and Slough to assist in meeting their unmet housing need. The Council has formally advised both Councils that due to the above constraints, it would not be in a position assisted them in meeting their unmet housing need.

### **The RBWM housing target**

- 3.43 On the basis of the evidence set out in the preceding sections the Council it committed to meeting its full housing needs and will continue to employ a housing target of 712 dwellings per annum for the plan period, equating to an overall target of 14,420 net new dwellings over the 2013 to 2033 Plan period.
- 3.44 This is based on maximising the use of suitable urban and rural brownfield, bringing forward public sector land, increasing densities wherever possible, using land efficiently and limited Green Belt release.

## 4. HOUSING TRAJECTORY AND PHASING

4.1 Paragraph 47 of the NPPF states local planning authorities should illustrate the expected rate of housing delivery through a housing trajectory for the plan period.

4.2 The phasing set out below shows how housing delivery will be increased to a level to meet the planned housing target of 14,240 over the plan period.

*Table 4.1: Anticipated housing target*

Year	2013/14	2014/15	2015/16	2016/17	2017/18
Units	420	420	420	420	420
Year	<b>2018/19</b>	<b>2019/20</b>	<b>2020/21</b>	<b>2021/22</b>	<b>2022/23</b>
Units	730	730	730	730	730
Year	<b>2023/24</b>	<b>2024/25</b>	<b>2025/26</b>	<b>2026/27</b>	<b>2027/28</b>
Units	850	850	850	850	850
Year	<b>2028/29</b>	<b>2029/30</b>	<b>2030/31</b>	<b>2031/32</b>	<b>2032/33</b>
Units	850	850	850	850	850

4.3 The Council has set out a ‘stepped’ approach to the trajectory with three phases covering the total plan period:

- 2013/14-2017/18: 420 units per annum
- 2018/19-2022/23: 730 units per annum
- 2023/24-2032/33: 850 units per annum

4.4 The stepped trajectory has been employed to take account of the nature of the land supply. For the first five years of the plan period the trajectory was below the housing OAN of 712 units per annum as the necessary market adjustment occurs. There are a number of larger sites earmarked for allocation which are located in the Green Belt, that are anticipated to take longer to come forward and deliver the units proposed. These will require on and off site infrastructure provision that will take time to deliver and in some cases, will need to be completed prior to commencement. Furthermore, larger sites will inevitably take longer to build out, and are subject to market demand and the willingness of developers to build at a certain rate. It should also be mentioned that delivery of these sites will inevitably be delayed by the time that it will take for the BLPSV-PC to be adopted and for that land to be released from the Green Belt.



- 4.5 A trajectory has been established that takes into account the likely delivery of housing allocation sites which will contribute to the Council's housing supply. In the interest of consistency, a stepped trajectory has been retained, it is also still considered to best reflect the most likely delivery scenario based on the supply of sites available, and therefore allows infrastructure, employment and services to be planned to match expected resident population growth.
- 4.6 It has been assumed that greenfield Green Belt sites will begin to deliver housing from year 10 onwards as the plan will need to be adopted and Green Belt boundaries amended before applications can be considered in this context. In some cases this may be a conservative approach, as smaller Greenfield Green Belt sites with limited infrastructure requirements may deliver within the first five years, but due to a lack of certainty a uniform approach has been taken.
- 4.7 The use of a stepped trajectory is not unique, as there is a wide ranging precedent, and has been successfully used by other LPAs. The Inspector in the examination of the East Staffordshire Local Plan 2012-2031 concluded that a stepped trajectory is the pragmatic approach to be taken, and that further consideration of 'omission' sites was not necessary.<sup>16</sup> Similar to RBWM the East Staffordshire Local Plan proposed to deliver a large proportion of housing through larger sites, referred to as Sustainable Urban Extensions, meaning that 'backloading' housing delivery through a stepped trajectory was an appropriate approach.
- 4.8 The Council considers that the above approach provides the Council with flexibility and the Inspector greater confidence that a five-year supply can be maintained in all but the most difficult of contingencies in a way that will not threaten the BLPSV-PC spatial strategy.

## **Five Year Housing Land Supply**

- 4.9 Paragraph 47 of the NPPF requires authorities to identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements. It also requires a buffer of 5% to be applied to the supply of housing, brought forward from later in the plan period to allow for choice and competition in the market. The buffer should be increased to 20% where there is a persistent record of under delivery.

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<sup>16</sup>Report on the Examination of the East Staffordshire Local Plan 2012-2031 (7 October 2015): Paragraphs 102, and 109-110  
(<http://www.eaststaffsbc.gov.uk/sites/default/files/docs/planning/planningpolicy/examination/E%20Staffordshire%20LP%20Report%20Final.pdf>)

- 4.10 The now abolished Regional Spatial Strategy for the South East housing target was the most recent for the Borough that underwent examination in public.<sup>17</sup> It shows that over this period the Borough cumulatively over provided against the South East Plan target, and the BLPSV-PC target.

*Table 4.1: Housing Trajectory*

RBWM HOUSING TRAJECTORY	2004/05	2005/06	2006/07	2007/08	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16
Berkshire Structure Plan	272	272										
South East Plan Target			346	346	346	346	346	346	346			
Emerging BLPSV-PC housing target for first 5 years										420	420	420
Number of new dwellings completed <sup>18</sup>	460	490	460	550	570	440	290	180	190	360	514	602
Supply against South East Plan			110	309	534	636	579	411	258			

- 4.11 The PPG recommends that the assessment of a local delivery record is likely to be more robust if a longer term view is taken, since this is likely to take account of the peaks and troughs of the housing market cycle. Housing delivery within the Borough has historically been above the Berkshire Structure Plan housing target and South East Plan housing target with the exception of the reduced returns in 2010/11 to 2012/13, which were due to the effects of the economic recession.
- 4.12 This level of delivery over a prolonged period shows that there has not been a record of persistent under-delivery of housing, and that it is appropriate to provide an additional buffer of 5% against the housing requirement. A list of deliverable sites that comprise this supply is set out in the HELAA 2019.

<sup>17</sup> The South East Plan was abolished in February 2013, except for Policy NRM6 which relates to residential development close to the Thames Basin Heaths Special Protection Area.

<sup>18</sup> Source: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/568412/LiveTable\\_122.xls](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/568412/LiveTable_122.xls)

Table 4.2: Five Year Housing Land Supply

CATEGORY	UNITS
Stepped BLPSV Requirement (2013/14-2023/24)	6,600
Net completions (2013/14 – 2018/19)	3,286
Residual requirement from 1 <sup>st</sup> April 2019 – 31 <sup>st</sup> March 2024	3,314
Residual requirement from 1 <sup>st</sup> April 2019 – 31 <sup>st</sup> March 2024 plus 5% buffer	3,480
Committed development anticipated to be delivered before 31 <sup>st</sup> March 2024	3,193
Windfall allowance	262
Other deliverable sites	1,514
<b>Total estimated delivery</b>	<b>4,969</b>
<b>5 Year Supply Position (years) including 5% buffer</b>	<b>7.13</b>

- 4.13 The Berkshire (including South Bucks) SHMA (2016) applied an uplift to the OAN on the basis of market signals, that effectively takes into account the historic (pre – 2013) unmet need of each authority. As a result any further uplift would be double counting, and as such has not been applied.

## 5. HOUSING SITE SELECTION & DISTRIBUTION

5.1 The BLPSV contains 48 housing allocation sites accommodating an estimated capacity of 8,286 units. As table 5.1 below shows, the housing units are distributed across the borough in a manner reflecting the spatial strategy with the majority focussed in and around Maidenhead.

*Table 5.1: BLPSV Housing distribution*

<b>LOCATION</b>	<b>NUMBER OF HOUSING SITES IN BLPSV</b>	<b>NUMBER OF HOUSING UNITS IN BLPSV</b>
<b>Maidenhead</b>	22	5726
<b>Windsor</b>	5	695
<b>Ascot</b>	5	605
<b>Other locations</b>	16	1260
<b>Total</b>	<b>48</b>	<b>8286</b>

5.2 In ID/09v2 the Inspector asked the Council to review its site allocations in light of the flooding, employment and other issues she had identified through the Examination process up until the point that the BLPSV entered the Pause Period. This section provides a summary of the site allocation review process that has been undertaken during the Pause period in response to her requests. It identifies the outcomes of the review, particularly in terms of sites that included a housing element. These outcomes have informed the proposed changes to the BLP site allocations.

### **The review of the BLPSV site allocations**

5.3 The review of the BLPSV allocations followed a series of steps which involved the following:

- Formalising in writing the site selection methodology and testing this with the 2018 HELAA site supply, sequential testing and SA processes.

- Undertaking a Call for sites and subsequent development of the 2019 HELAA
- Undertaking the Sequential testing using the 2019 HELAA data and the methodology agreed with the Environment Agency (EA) in the October 2018 SoCG between RBWM and the EA.
- Running the 2019 HELAA data through the site selection methodology. This resulted in the division of the 2019 HELAA sites into a set of sites for proposed allocation and a further set of sites that were rejected.
- Rationalising the selected sites into allocation sites. This occasionally involved merging multiple smaller sites into a larger proposed allocation. Where this happened, the resulting larger sites were run through the Sequential Test.
- Checking that the selected sites would deliver sufficient unit numbers to help deliver the required housing target.
- Checking the deliverability of the selected sites in terms of phasing and trajectory
- Confirming that the selected sites could deliver a 5 year housing land supply.
- Testing the resulting site selections through the exceptions, viability, transport, HRA, water quality and SA processes.
- Review and adjustment of the sites and policy requirements in response to the testing process
- Development of the detailed requirements of the site allocations proformas – Appendix C of the BLPSV-PC.

#### DEVELOPMENT OF THE SITE SELECTION METHODOLOGY

- 5.4 The process of selecting the sites that went into the Regulation 18 version was an extended iterative process involving collection and analysis of background data as well as discussions between Members and Officers and decision-making by Members. Although a site selection process was followed it was not formally captured in written form.
- 5.5 Following a review of the earlier site selection processes and discussions with Members and external consultants, a draft site selection process to enable the BLPSV allocations to be reviewed was devised.
- 5.6 It was felt essential to test and check the methodology and this was done in spring 2019 using the 2018 HELAA sites, the sequential test based on the HELAA information

and the SA process. The methodology was tweaked slightly in response to the testing process and the finalised version produced in May 2019. This formalised site selection methodology is set out in Appendix B.

- 5.7 The methodology, and the application of it, underpins the review of the BLPSV allocations and the proposed changes set out in the BLP-PC.

#### OUTCOMES OF THE SITE ALLOCATION REVIEW PROCESS

- 5.8 Following the application of the site selection methodology to the 2019 HELAA sites two lists of sites were derived:

- Sites considered suitable for allocation
- Rejected sites **not** considered suitable for allocation

- 5.9 These two list were refined over a period of weeks through an iterative process involving consultant testing, amalgamation of smaller sites into larger parcels and internal checking. The emerging suitable and rejected sites lists were discussed with Members.

- 5.10 By the end of the process there were 34 sites in the list of sites considered suitable for allocation and 285 rejected sites. The list of proposed allocation sites, with the reasons for their selection is set out in Appendix C. Rejected sites, with the reasons for their rejection, are set out in Appendix D.

- 5.11 BLPSV HA sites are identified in the two lists in Appendices C & D. It can be seen that not all the BLPSV HA sites are contained in the list of proposed allocation sites. A significant number can be found in the rejected list. For clarity, Table 5.2 below summarises the outcome of the 2019 site selection review process for each of the 48 BLPSV HA sites.

*Table 5.2: Outcome of the site allocation review for the BLPSV HA sites*

Ref	Description	Site retained in BLP	Summary of reason for removal
HA1	Maidenhead Railway Station	Yes	N/A
HA2	Reform Road	No	Flood Risk, Loss of employment
HA3	Saint-Cloud Way	Yes	N/A
HA4	West Street	Yes	N/A
HA5	York Road	Yes	N/A

Ref	Description	Site retained in BLP	Summary of reason for removal
HA6	Maidenhead Golf Course	No	Combined into AL13 - Desborough
HA7	Land south of Harvest Hill Road, Maidenhead	No	Combined into AL13 - Desborough
HA8	Land south of Manor Lane, Maidenhead	No	Combined into AL13 - Desborough
HA10	Ascot Centre	Yes	N/A
HA11	Land west of Windsor, north and south of the A308, Windsor	Yes	N/A
HA12	Boyn Valley Industrial Estate, Maidenhead	No	Loss of Employment site
HA13	Exclusive House, Oldfield Road, Maidenhead	No	Site has now commenced and is under construction, and has moved to commitments
HA14	Land south of Ray Mill Road East , Maidenhead	No	Remove Flood risk, Loss of urban open space, Ecology, Sport England (Playing pitches)?
HA15	Middlehurst, 90-103 Boyn Valley Road, Maidenhead	No	Too far progressed in development pipeline. Moved to commitments
HA16	Osbornes Garage, 55 St Marks Road, Maidenhead	No	Loss of employment and too far progressed in development pipeline. Moved to commitments
HA17	Tectonic Place, Holyport Road, Maidenhead	No	Loss of employment
HA18	Land between Windsor Road and Bray Lake, south of Maidenhead	Yes	N/A
HA19	Whitebrook Park, including land east of Whitebrook Park, Lower Cookham Road, Maidenhead	No	Flood Risk (all 3 sites), Loss of employment (2 sites), undeveloped field for 1 site
HA20	Land east of Woodlands Park Avenue and north of Woodlands Business Park Maidenhead	Yes	N/A
HA21	Land known as Spencer's Farm, north of Lutman Lane, Maidenhead	Yes	N/A
HA22	Land north of Breadcroft Lane and south of the railway line, Maidenhead	No	Conflict with H&W NP
HA23	Land west of Monkey Island Lane, Maidenhead	No	Existing M&W, considered undeliverable in Plan period
HA24	Summerleaze, Summerleaze Road, Maidenhead	No	Existing M&W, Employment, Flood Risk
HA25	Minton Place, Victoria Street, Windsor	Yes	N/A
HA26	Shirley Avenue (Vale Road Industrial Estate), Windsor	No	Loss of employment. Flood Risk. Northern half of site is under construction and has moved to commitments.

Ref	Description	Site retained in BLP	Summary of reason for removal
HA28	Windsor and Eton Riverside Station Car Park	Yes	N/A
HA29	Windsor Police Station, Alma Road, Windsor	No	Site no longer available
HA30	Ascot Station Car Park	Yes	N/A
HA31	Englemere Lodge, London Road, Ascot	Yes	N/A
HA32	Heatherwood Hospital, Ascot	Yes	N/A
HA33	Silwood Park, Sunningdale	No	Loss of employment, Employment & education conflict, green belt intensification in isolated location
HA34	Sunningdale Park, Sunningdale	Yes	N/A
HA35	Gas holder site, Bridge Road, Sunninghill	No	Site has been granted permission and has S106 agreements in place. Moved to commitments
HA36	Broomhall Car Park, Sunningdale	Yes	N/A
HA37	White House, London Road, Ascot	Yes	N/A
HA38	Cookham Gas holder, Whyteladyes Lane, Cookham	Yes	N/A
HA39	Land east of Strande Park, Cookham	Yes	N/A
HA40	Land north of Lower Mount Farm, Long Lane, Cookham	Yes	N/A
HA41	Land north and east of Churchmead Secondary School, Priory Road, Datchet	No	Flood Risk, Loss of best and most versatile agricultural land
HA42	Land at Slough Road/Riding Court Road, Datchet	Yes	N/A
HA43	Land north of Eton Road adjacent to St Augustine's Church, Datchet	No	Flood Risk, Green Belt
HA44	Land east of Queen Mother Reservoir, Horton	Yes	N/A
HA45	Land adjacent to Coppermill Road, Horton	No	Isolated Green Belt site, Parish not overly supportive
HA46	Straight Works, Old Windsor	No	Flood Risk, loss of employment
HA47	95 Straight Road, Old Windsor	No	Flood Risk, loss of employment
HA48	Tithe Farm, Tithe Lane, Wraysbury	No	Green Belt, Flood Risk, adjacent to SPA
HA49	DTC Research. Belmont Road, Maidenhead	No	Loss of employment, availability
HA50	Grove Business Park, White Waltham	No	Isolated PDL Green belt, Loss of employment



5.12 Overall, the review has identified a need for the following key changes to be made to the BLPSV housing allocations:

- Deletion of 22 HA sites;
- Addition of 9 new sites with housing elements;
- Merging of some sites to create larger parcels;
- Changes to boundaries, site areas and housing numbers on some sites;
- New and enhanced site specific requirements to be developed for each of the allocated sites.

5.13 The proposed changes to the BLPSV are proposing 34 sites with housing uses, compared with 48 in the BLPSV. Details of the proposed new allocation sites (including their specific uses, boundaries, housing numbers and site specific requirements) can be found in policies QP1a, QP1b, QP1c, HO1 and Appendix C of the BLPSV-PC. They are also shown on the proposed changes to the Policies Maps.

## Distribution

5.14 The proposed changes to policy HO1 have resulted in a reinforcement of the spatial strategy with a small increase in concentration of housing numbers in Maidenhead. The biggest change between the BLPSV and the BLPSV-PC relates to the reduction in housing numbers and sites allocated around the borough in the smaller settlements (Table 5.3).

*Table 5.3: Proposed changes to BLPSV Housing distribution*

LOCATION	NUMBER OF BLPSV-PC HOUSING SITES	NUMBER OF HOUSING UNITS IN BLPSV-PC
<b>Maidenhead</b>	15	5739
<b>Windsor</b>	5	666
<b>Ascot</b>	6	766

<b>Other locations</b>	<b>8</b>	<b>720</b>
<b>Total</b>	<b>34</b>	<b>7891</b>

5.15 As can be seen from Table 5.4 below, the allocation review has also resulted in a reduction in both the number and number of housing units being proposed for housing related allocation on green belt sites and on sites at flood risk flood.

*Table 5.4: Comparison of BLPSV & BLPSV-PC housing sites in relation to green belt and flood risk*

<b>BLP VERSION</b>	<b>NUMBER OF HOUSING SITES IN, OR PARTIAL IN GREEN BELT</b>	<b>NUMBER OF HOUSING UNITS IN, OR PARTIALLY IN GREEN BELT</b>	<b>NUMBER OF HOUSING SITES WITH FLOOD ZONE 3</b>	<b>NUMBER OF HOUSING UNITS WITH FLOOD ZONE 3</b>
<b>BLPSV</b>	<b>26</b>	<b>5958</b>	<b>20</b>	<b>2926</b>
<b>BLPSV-PC</b>	<b>16</b>	<b>5190</b>	<b>5</b>	<b>737</b>

## 6. HOUSING DENSITY

- 6.1 The NPPF states that local authorities should set out their own approach to housing density to reflect local circumstances (Paragraph 47).
- 6.2 The Council expects to apply bespoke density approaches in the strategic growth location of Maidenhead where intensified urban environments, including tall buildings, will be necessary to deliver the required housing and employment developments. This intensification of Maidenhead will support local jobs and services, and make more efficient use of brownfield land. It will result in a step change in the townscape of Maidenhead and provide opportunities to create landmark identities and places with new and innovative character. The Council's Tall Building Study 2019 provides detailed information in relation to intensification via raising context heights and provision of tall buildings in appropriate locations. Additional information is set out in BLPSV-PC policies SP3 and SP3a and in the HELAA (2019).

## 7. HOUSING MIX

- 7.1 Chapter 8 of the Berkshire (including South Bucks) SHMA (2016) considered that the provision of market housing should be more explicitly focused on delivering smaller family housing for younger generations. For the Eastern Berks and South Bucks HMA the following was suggested:

*Table 7.1 - Recommended Housing Mix – Eastern Berkshire and South Bucks HMA<sup>19</sup>*

Size mix of market housing	%
<b>1-bed properties</b>	5-10
<b>2-bed properties</b>	25-30
<b>3-bed properties</b>	40-45
<b>4-bed properties</b>	20-25

- 7.2 A large proportion of 1-2 bed properties are likely to be supplied in Maidenhead town centre in the form of high density flatted development. However, as stated previously, it is the release of the Green Belt sites that will make a significant contribution to delivering smaller family housing, alongside some larger housing, to meet the need identified and the mix suggested. There are too few brownfield sites in existing settlements that can provide a mix of housing that will support a balance of housing types and tenures required, and relying solely on previously developed sites risks housing supply being weighted too heavily towards delivering 1-2 bed properties in higher density flatted schemes. The appropriate mix of dwellings by type and size of units will be considered as part of the planning application process for each individual site taking into consideration the SHMA guidance and the opportunities the site presents.

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<sup>19</sup> Berkshire (including South Bucks) SHMA (2016): Table 140

## 8. AFFORDABLE HOUSING

8.1 Paragraph 50 of the NPPF states that in order to provide a wide choice of housing and create sustainable and mixed communities, local planning authorities should plan for a mix of housing. This should take account of current and future demographic and market trends and the needs of different groups. The size, type, tenure and range should reflect local demand.

8.2 Affordable housing provision in the Borough has varied over a prolonged period. The table below sets out trends from 2006/07 onwards. As housing supply in the Borough has predominantly relied on the delivery of smaller sites, the threshold for affordable housing provision has not always been met. This has been further complicated through the use of Viability Studies which can serve to undermine the delivery of on-site affordable housing on financial grounds.

*Table 8.1 - Historic Housing Delivery*

HOUSING TRENDS	2006/07	2007/08	2008/09	2009/10	2010/11	2011/12	2012/13	Y1 2013/14	Y2 2014/15	Y3 2015/16	Historical Trend 2006/07 to 2015/16
PRIVATE	314	314	246	206	200	202	174	343	431	588	3018
AFFORDABLE	45	134	228	145	-10	-24	19	17	83	15	652
TOTAL	359	448	474	351	190	178	193	360	514	603	3670
% AFFORDABLE	12.5	29.9	48.1	41.3	-5.3	-13.5	9.8	4.7	16.1	2.5	17.8

8.3 The Berkshire (including South Bucks) SHMA (2016) recognised the difficulties in calculating what proportion of affordable homes should be provided through different affordable tenure categories. The SHMA further suggested a reasonable tenure mix or affordable housing across the Study-area:

- 20-25% - intermediate housing
- 75-80% - social/affordable rented housing

8.4 Chapter 8 of the Berkshire (including South Bucks) SHMA (2016) considers the overall mix of affordable housing through development schemes.

Table 8.2 - Recommended Mix – Eastern Berks and South Bucks HMA<sup>20</sup>

Size mix of affordable housing	%
<b>1-bed properties</b>	35-40
<b>2-bed properties</b>	25-30
<b>3-bed properties</b>	25-30
<b>4-bed properties</b>	5-10

- 8.5 Meeting the considerable affordable housing need is a very significant challenge. Setting the housing target at a level that meets the identified OAN of 14,240 units over the plan period and allocating larger sites for development facilitates the delivery of a larger amount of affordable housing across various types. The amount of affordable housing as a percentage of total housing delivery is therefore anticipated to increase over the plan period. The Viability Study has shown that the majority of sites can bring forward affordable housing whilst ensuring a reasonable rate of return, reducing the risk of provision being reduced. The Viability Update further shows that the 30% provision of Affordable Housing on the site typologies tested, it also shows that 40% provision is possible on certain greenfield sites and these strike an appropriate balance by ensuring most sites remain viable, and are therefore able to provide Affordable Housing. Whilst this is below the recommended percentage identified in the SHMA it represents a considerable uplift on the current supply. The delivery of affordable housing outside this system such as through Rural Housing Exception Sites will also be welcomed, providing the criteria stated in Policy HO3 are met.

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<sup>20</sup> Berkshire (including South Bucks) HMA (2016): Page 27

## 9. HOUSING FOR SPECIFIC GROUPS

### Housing Needs of Older People

- 9.1 The Planning Practice Guidance recognises the need to provide housing for older people, which can include supporting independent living which can provide more choice, enhanced wellbeing and social inclusion and reduced care costs, and may free up houses that are currently under occupied.<sup>21</sup> Table 110 of the Berkshire (including South Bucks) SHMA (2016) shows that there is anticipated to be a notable increase in the total number of people aged 65 and over through the plan period in the Eastern Berks and South Bucks HMA due to the ageing residential population. In addition, Table 117 of the Berkshire (including South Bucks) SHMA (2016) sets out the projected need for older persons accommodation (including specialist housing) by broad tenure (2013-2036).<sup>22</sup>

*Table 9.1 - Projected need for Older Persons Accommodation (including Specialist Housing) - by broad tenure (2013-36)*

		Market	Affordable	Total
RBWM	<b>Need</b>	2,155	1,061	3,216
	<b>Supply</b>	289	1,026	1,315
	<b>Net Need</b>	1,866	35	1,901
Eastern Berks and South Bucks HMA	<b>Need</b>	4,373	2,386	6,759
	<b>Supply</b>	873	1,954	2,287
	<b>Net Need</b>	3,500	432	3,932
Study Area	<b>Need</b>	12,652	6,840	19,132
	<b>Supply</b>	3,195	5,072	8,267
	<b>Net Need</b>	9,457	1,408	10,865

- 9.2 Applications for the development of residential care homes will be judged on their own merits, and in accordance with Development Plan.
- 9.3 In addition to specialist care for older people, there is a need to consider Registered Care Housing (C2 use class). Table 118 of the Berkshire (including South Bucks) SHMA (2016) sets out projected number of people (aged 75+) living in institutional accommodation in 2036 compared with current supply. It is recognised that although residential institutions which do not meet the definition of a dwelling cover more than

<sup>21</sup> PPG Paragraph: 021 Reference ID: 2a-021-20160401

<sup>22</sup> Note that this figure includes information beyond the plan period to 2036. Specialist Housing is defined

just elderly accommodation, the elderly age groups are the only ones expected to see a notable increase in population. This is calculated from the need anticipated based on the existing residential population projections.

*Table 9.2 - Potential Need for Residential Care Housing*

	Institutional population aged 75+ (2036)	Current supply (bed spaces)	Net need to 2036 (bed spaces)
RBWM	2,028	1,286	742
Eastern Berks & South Bucks HMA	3,602	2,406	1,196
Study Area	8,643	5,181	3,462

## People with Disabilities

- 9.4 The ageing nature of the population further raises the importance of adaptable housing that can cater for a variety of needs and changing life circumstances. BLPSV Policy HO2 sets out how new homes should take into account the needs of current and future households. This includes a portion of dwellings being wheelchair accessible, and can also involve designing in wider doorframes, lower window sills and spaces that could be used for platform lifts between floors, as set out in Part M of the Building Regulations.

## Rural Exception Sites

- 9.5 Annex 2 of the NPPF defines rural exception sites as ‘small sites use for affordable housing in perpetuity where sites would not normally be used for housing.’ BLPSV Policy HO3 supports development proposals for limited affordable housing within the Green Belt where the criteria stated are met.

## Starter Homes

- 9.6 In 2015 the government pledged to delivery ‘Starter Homes’ aimed at first time buyers who would otherwise be unable to purchase a home. The provision of ‘Starter Homes’ will be supported as part of the drive to address housing affordability in accordance with forthcoming national guidance.



## **Custom/Self Build Housing**

- 9.7 The Self Build and Custom Housebuilding Act 2015 and the Housing White Paper (2017) reaffirmed the government’s commitment to encouraging people to self-build, or instructing others to build their own home for them.
- Self-Build: Usually means that individuals are directly involved in organising and designing the construction of a new home.
  - Custom Build: Involves working with a specialist developer to help deliver a home. This often involves a specialist managing the day to day development.
- 9.8 The Act requires relevant authorities like the Council to keep a register of people and interested associations that are seeking land to construct self-build or custom build housing. Parties can register their interest through the Council’s website.<sup>23</sup> The Council will not publish details of individuals on the register, but, in accordance with the PPG will include headline data on the quantity of demand in the AMR.
- 9.9 At the time of writing 181 individuals have submitted the form and are included on Council’s register. From the information submitted the majority of respondents reside in the Borough, but with additional interest from around the south east. It is too simplistic to conclude that all those registered would take up any offer of a self/custom build plots; but it does give an indication of demand.
- 9.10 The Council has taken a proactive role in seeking to provide plots for self-build and custom housebuilding and is proposing to introduce an addition to policy HO2 which requires developments of 20 or more units to provide 5% of the proposed dwelling numbers as fully serviced plots for custom and self build.

## **Gypsies and Travellers**

- 9.11 Gypsies, Travellers and Travelling Showpeople form part of the community within the Borough with particular housing needs. The Council has determined that to plan positively and manage development to meet the needs of this group, a separate Local Plan devoted to the needs of this part of the community will be developed. The Local Development Scheme sets out further information regarding the anticipated programme for the Traveller Local Plan.
- 9.12 There is meanwhile, a need to provide guidance for consideration of applications that may come about before the Traveller Local Plan is adopted. Many of such

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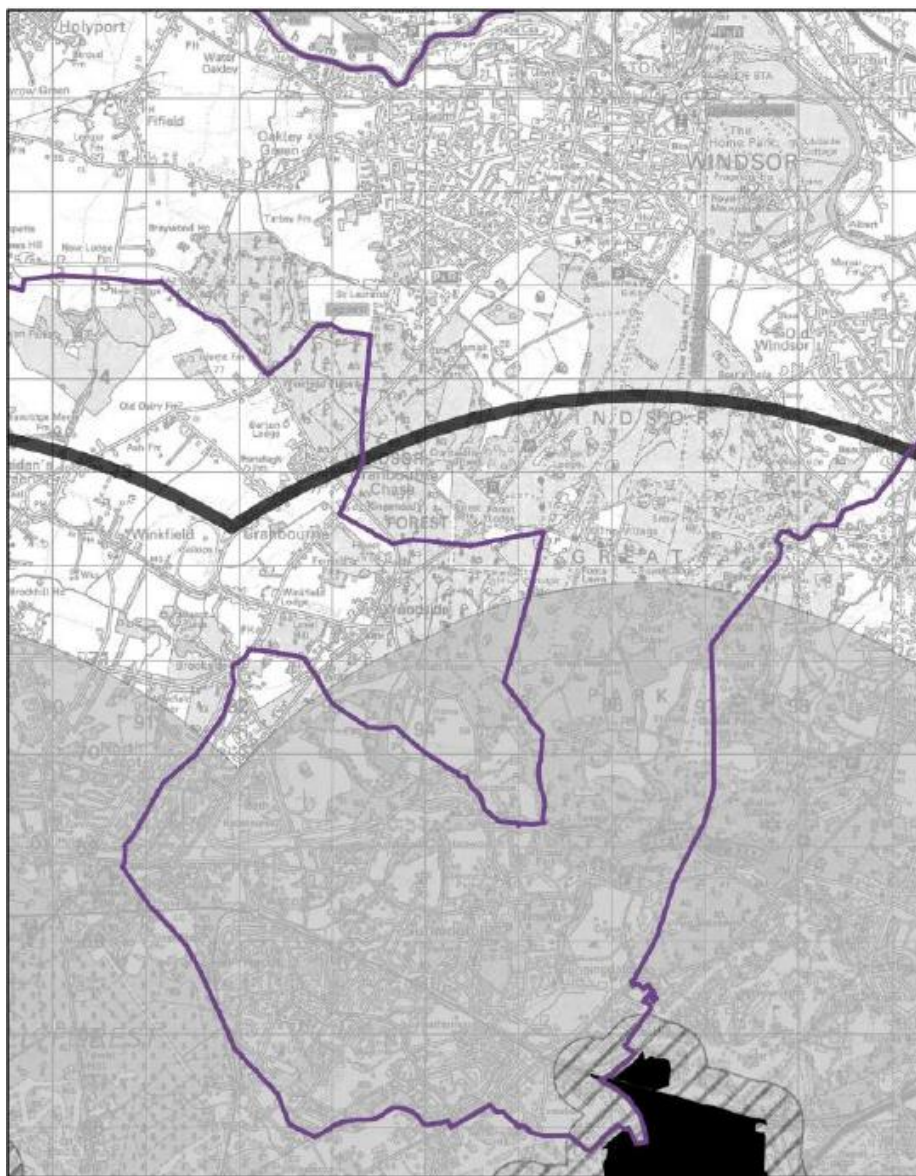
<sup>23</sup> [https://www3.rbwm.gov.uk/downloads/file/2424/self\\_build\\_and\\_custom\\_build\\_registration\\_form](https://www3.rbwm.gov.uk/downloads/file/2424/self_build_and_custom_build_registration_form)

proposals are for pitches on Green Belt land. These will be considered with reference to national policy, particular regard will be had with regard to development in areas liable to flood, and on Green Belt land. For all proposed development pitches and plots for Gypsy and Travellers and Travelling Showpeople, best practice set out in the national Planning Policy for Traveller Sites 2015, advises locally specific criteria to be used to guide allocation of sites in plans and to form the policy used to assess applications which come forward on unallocated sites.

## **10. SUITABLE ALTERNATIVE NATURAL GREENSPACE (SANG)**

- 10.1 The Thames Basin Heaths Special Protection Area is an international designation covering parts of Berkshire, Hampshire and Surrey. The designation protects a network of important bird conservation sites across Europe. The ground nest bird population of the SPA is particularly sensitive to increased recreational impacts from visitors as well as the effects of urbanisation such as cat ownership, fires and litter dumping. Under the Habitat Regulations, in order for development proposals within the zone of influence around the SPA to be acceptable, it must be demonstrated that they will have no likely significant effect on the SPA, either alone or in combination with other development. The Council's Thames Basin Heaths SPD provides guidance on how the impact of new residential developments on the TBHSPA is assessed and may be mitigated against.
- 10.2 Within the 400m zone around the SPA it is not considered possible for mitigation measures to protect the integrity of the SPA from the impacts resulting from a net increase in the number of dwellings. This is due to both the additional recreational pressure on the SPA and as well as the impact of cat predation on the protected bird species.
- 10.3 All new residential development resulting in a net increase in the number of dwellings within 5km of the Thames Basin Heaths could have a significant effect on the integrity of the SPA designation either alone or when considered in combination with other development. Part of the agreed approach to ensure effective mitigation is the provision of Suitable Alternative Natural Greenspace (SANG) to encourage recreational activities away from the sensitive site.
- 10.4 Where it is not possible for a development to provide its own SANG, a financial contribution will be able to be made towards a SANG, including that, provided by the Royal Borough, in the form of Allen's Field in Ascot. This SANG has been calculated to be capable of mitigating the impact of 462 additional dwellings. As residential developments are granted planning permission the capacity of the Allen's Field SANG has reduced. A southern extension to this SANG has been negotiated and will provide additional capacity to mitigate the impact of around 80 dwellings.
- 10.5 As development continues to come forward in the Ascot area additional SANG capacity will be required. Larger development sites such as Heatherwood Hospital will need to provide an on-site bespoke SANG solution to mitigate their impact.

Figure 5.1: Thames Basin Heaths Special Protection Area (from Thames Basin Heaths Special Protection Area SPD) (2010)



10.6 Discussions with landowners in the area are ongoing, in consultation with Natural England, to secure additional SANG to successfully mitigate the development anticipated to come forward.

# APPENDIX A – CALCULATING THE OAN FOR RBWM

## Calculating OAN

### DEMOGRAPHIC STARTING POINT

#### *SHMA (2016) Demographic Starting Point*

1.1 In accordance with the PPG the starting point for estimating overall housing need was the CLG household projections.<sup>24</sup> The demographic starting points for the SHMA were the 2012 Sub-National Population Projections (SNPP) by the Office of National Statistics (ONS) in May 2014, and the 2012 based Household Projections, published by Communities and Local Government in February 2015.

1.2 The following two tables (3 & 4) identify the position for the best fit Eastern Berkshire and South Bucks HMA as set out in the Berkshire (including South Bucks) SHMA 2016:

#### *Influence of later Demographic Projections*

1.3 It is noted that since the data analysis stage of the Berkshire (including South Bucks) SHMA, the 2014 based ONS SNPP and CLG (2014 based) household projections have since been published. This has resulted in a reduction to both the projected population and household projections across the HMA. This data has been sensitivity tested, but does not alter the OAN for the Borough, or the Eastern Housing Market Area.

1.4 By applying the concept of headship rates<sup>25</sup>, it is possible to estimate the projected household growth as shown in Table 5.

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<sup>24</sup> PPG: Paragraph 15 (ID: 2a-015-20140306)

<sup>25</sup> Headship rates can be described in their most simple terms as the number of people who are counted as heads of households (Household Reference Person (HRP))

**Table 3 - Projected population growth using 2012 SNPP (2013-2036)<sup>26</sup>**

	Population 2013	Population 2036	Change in population	% change
<b>RBWM</b>	146,335	171,660	25,325	17.3%
<b>Slough</b>	143,024	177,553	34,529	24.1%
<b>South Bucks</b>	67,941	82,483	14,542	21.4%
<b>Eastern Berkshire and South Bucks HMA</b>	357,300	431,696	74,396	20.8%
<b>Study Areas<sup>27</sup></b>	946,372	1,107,155	160,783	17.0%
<b>South East</b>	8,784,800	10,254,600	1,469,800	16.7%
<b>England</b>	53,843,600	61,886,100	8,042,500	14.9%

**Table 4 - Household growth projected by CLG (2013-2036)<sup>28</sup>**

	Households 2013	Households 2036	Change in Households	% change
<b>RBWM</b>	59,605	74,099	14,494	24.3%
<b>Slough</b>	52,472	72,442	19,970	38.1%
<b>South Bucks</b>	27,095	34,550	7,455	27.5%
<b>Eastern Berkshire and South Bucks HMA</b>	139,172	181,091	41,919	30.1%
<b>Study Area</b>	375,395	467,756	92,361	24.6%
<b>South East</b>	3,631,482	4,490,835	859,353	23.7%
<b>England</b>	22,499,536	27,363,402	4,863,866	21.6%

**Table 5 - Projected Household Growth 2013-36 – 2014 based SNPP**

<sup>26</sup> Berkshire (including South Bucks) SHMA (2016): 137. Note that due to inclusion within the modelling of mid-2013 population estimates for each of the local authorities the figures do not exactly match those in the SNPP. Figures for comparator areas are however taken directly from the SNPP.

<sup>27</sup> The Study Areas for the Berkshire (including South Bucks) SHMA (2016) West Berkshire, Reading, Wokingham and Bracknell Forest (Western Berkshire HMA), and RBWM, Slough, and South Bucks (Eastern HMA)

<sup>28</sup> Berkshire (including South Bucks) SHMA (2016): 136

	Households 2013	Households 2036	Change in households	Per annum
<b>RBWM</b>	59,440	71,974	12,533	545
<b>Eastern Berkshire and South Bucks HMA</b>	138,762	173,873	35,111	1,527

1.5 An analysis has been undertaken using the 2014 based SNPP with data for 2015 being overwritten by the Mid-Year Estimates (MYE). This shows a slightly lower level of household growth across the HMA.

**Table 6: Projected Household Growth 2013-2036 – 2014 based SNPP (+MYE)<sup>29</sup>**

	Households 2013	Households 2036	Change in households	Per annum
<b>RBWM</b>	59,440	71,924	12,283	534
<b>Slough</b>	52,307	67,656	15,349	667
<b>South Bucks</b>	27,015	33,980	6,965	303
<b>Eastern Berkshire and South Bucks HMA</b>	138,762	173,359	34,597	1,504

1.6 The following table shows projected population growth from 2013 – 2036 in the Borough and the HMA using the 2014 based SNPP.

**Table 7: Projected population growth (2013 – 2036) – 2014 based SNPP**

	Population 2013	Population 2036	Change in population	% change
<b>RBWM</b>	146,335	167,043	20,708	14.2
<b>Slough</b>	143,024	169,610	26,586	18.6
<b>South Bucks</b>	67,941	81,810	13,869	20.4
<b>Eastern Berkshire and South Bucks HMA</b>	357,300	418,463	61,163	17.1

1.7 The below table compares the 2012 and 2014 SNPP in the period 2013-2036. Together this shows that the 2012 based SNPP projected a higher level of household growth, linked to higher population growth projections.

<sup>29</sup> Derived from ONS and CLG data

**Table 8: Projected population growth (2013-2036) – comparing projection releases<sup>30</sup>**

	2012 based SNPP	2014 based SNPP	Difference	Difference from 2012 based (%)
<b>RBWM</b>	25,447	20,708	-4,739	-18.6%
<b>Slough</b>	35,011	26,586	-8,425	-24.1%
<b>South Bucks</b>	14,166	13,869	-297	-2.1%
<b>Eastern Berkshire and South Bucks HMA</b>	74,624	61,163	-13,461	-18.0%

- 1.8 In summary, between 2013 and 2036 the population of RBWM is projected to increase by about 20,700 people based on the 2014 SNPP. The projected level of population growth in the 2014 based SNPP is 19% lower than in the 2012 based version (4,700 people lower). In addition, using the updated household formation from the 2014 based CLG household projections, and taking account of the 2015 mid-year population estimates the number of households in RBWM would be projected as 534. This is lower than the 2012 based projections of 630 households per annum. This sensitivity testing provides a useful update based on more recent data, but does not alter the evidence base for the BLPSV in relying on the OAN set out in the Berkshire (including South Bucks) SHMA (2016), which used the 2012 SNPP and 2012 Household Projections.

#### UPLIFTS

- 1.9 As stated in the PPG the projections included in the SHMA should be considered in light of possible adjustments to consider market signals, employment trends, and need for affordable housing. Further explanation of how adjustments were made is included in the SHMA and briefly detailed in the following sections.

#### **Market Signals and Economic Uplift**

- 1.10 The SHMA considered market signals as required by the PPG. Table 96 of the SHMA states that as a percentage of base OAN the revised level of need represents an uplift of 8.2% across the study area. This reflects the affordability pressures across all tenures, which resulted in the SHMA uplifting housing need.

<sup>30</sup> 2014 based Subnational Population and Household Projections (2016): 3 (Table 2.2)



- 1.11 Representations made during the December 2016 Regulation 18 consultation on the Draft Borough Local Plan contended that further amendments are required to take account of changes to economic projections and market signals. The SHMA used data provided by Cambridge Economics (September 2013) to assess both past employment trends and forecasts of future employment growth.<sup>31</sup> There is some uncertainty regarding economic projections, particularly in light of the United Kingdom triggering Article 50 of the Lisbon Treaty (2009) to leave the European Union.
- 1.12 In addition, the 2016 referendum result that has led to increased uncertainty about future job growth.<sup>32</sup> It is therefore difficult to accurately forecast the future economic scenarios, which is reinforced by the differences between the forecasts prepared by the three leading houses.
- 1.13 This position reflects national policy in that an appropriate evidence base has been used that takes account of relevant housing and economic signals.<sup>33</sup> The PPG<sup>34</sup> further notes that ‘market signals are affected by a number of economic factors, and plan makers should not attempt to estimate the precise impact on an increase in housing supply.’ As a result, it is considered appropriate to maintain the existing position outlined in the SHMA, as a further uplift would not accurately reflect the current volatility in the market, which appears likely to continue in the short to medium term.

#### ***Affordability***

- 1.14 The PPG further outlines that adjustments to the assessed housing need should be made where evidence points to particular affordability issues, or a supply-demand imbalance. However, this adjustment is not quantified. An uplift to improve affordability was included for RBWM of 55 homes per annum. No allowance in the SHMA was made for reversing suppressed household formation for the eastern Berks and South Bucks HMA. Since the SHMA was published up dated information has become available.<sup>35</sup>
- 1.15 The following tables highlight the increasing prices of housing in relation to earnings over recent years, particularly as it shows how house prices have increased as wages have stagnated.

#### ***Table 9: Ratio of lower quartile house price to lower quartile gross annual (where available) residence based earnings***

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<sup>31</sup> SHMA (2016): Paragraph 5.9

<sup>32</sup> For example the OBR has revised down economic forecasts beyond 2017 to take account of this uncertainty. (<http://cdn.budgetresponsibility.org.uk/ExecutiveSummaryMarch2017EFO.pdf>)

<sup>33</sup> NPPF: 158

<sup>34</sup> PPG: Paragraph 020 (ID: 2a-020-20140306).

<sup>35</sup> Note that since the publication of the SHMA the relevant dataset was transferred from CLG to ONS. The methodology has since been refined, resulting in minor changes between the data.

	2013	2016	Difference
RBWM	10.87	13.29	2.42
South Bucks	12.70	14.30	1.6
Slough	7.08	10.45	3.37
Eastern Berks and South Bucks HMA Average	10.22	12.68	2.46
England Average	6.45	7.16	0.71

**Table 10: Ratio of lower quartile house price to lower quartile gross annual (where available) workplace based earnings**

	2013	2016	Difference
RBWM	10.63	14.81	4.18
South Bucks	13.25	17.31	4.06
Slough	6.8	9.61	2.81
Eastern Berks and South Bucks HMA Average	10.23	13.91	3.68
England Average	6.57	7.16	0.59

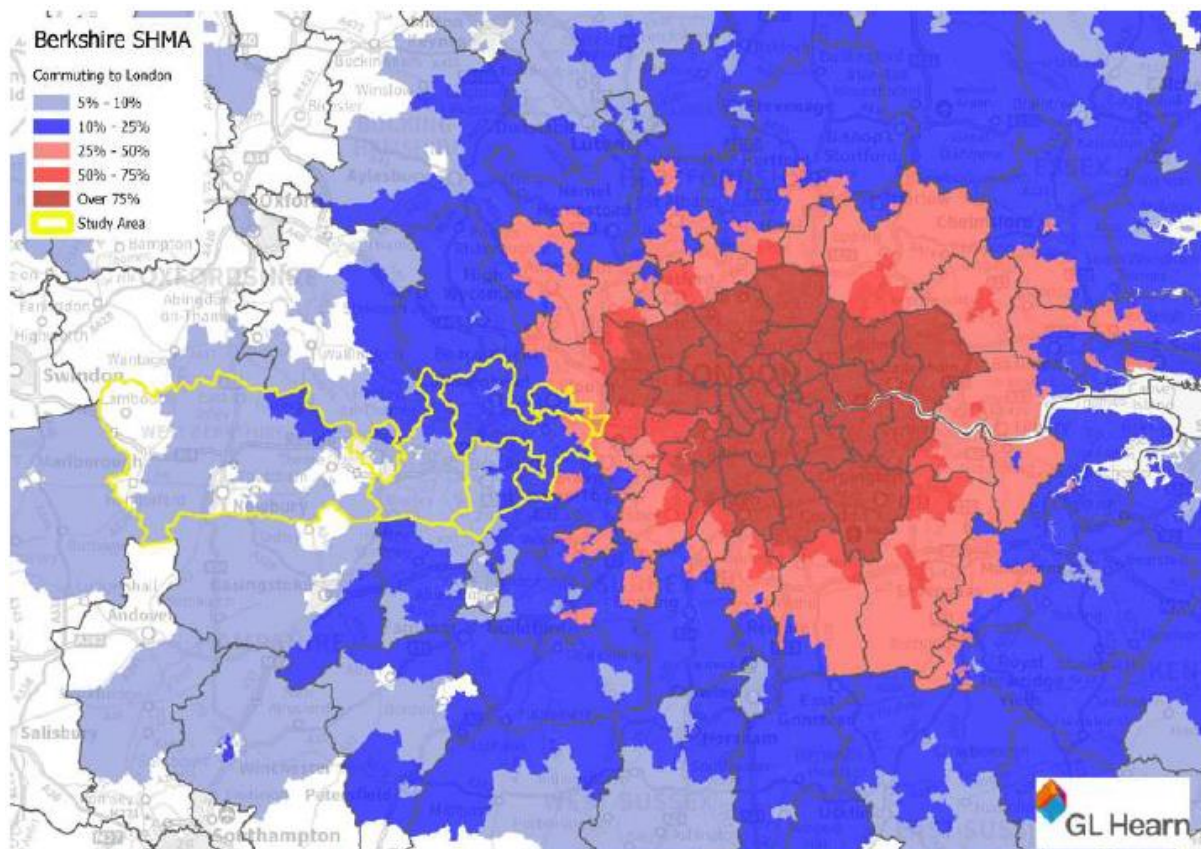
## LONDON AND HEATHROW

- 1.16 The proximity of the Borough and the wider HMA to London results in strong commuting flows into the capital. The SHMA acknowledges these links between the HMA and London, and notes that those authorities in the east of the County (including RBWM) have a significant relationship with some west London Boroughs.<sup>36</sup>

**Figure 5.2: Commuting to London (% of those in Employment in given MSOA) (2011)<sup>37</sup>**

<sup>36</sup> Berkshire (including South Bucks) SHMA (2016) Table 8.

<sup>37</sup> Berkshire (including South Bucks) SHMA (2016): Figure 23



Source: ONS, Census 2011, © Crown copyright and database rights 2015 Ordnance Survey

- 1.17 The Berkshire (including South Bucks) SHMA (2016) recognised that there is a degree of uncertainty regarding future migration dynamics to/from London, and that as part of the plan making process the consultants advised each local authority to take account of more recent data and evidence as part of the plan making process. The SHMA examined the GLA population and household projections produced to test the impact of the recession on migration flows between London and the HMAs, and concluded that flows to and from the Eastern HMA were largely unaffected.
- 1.18 Part of the uncertainty regarding flows to and from London can be attributed to Crossrail, with the two way movement of labour likely to increase as Maidenhead will become directly linked to central and eastern London. In 2012 a GVA Study<sup>38</sup> stated that Maidenhead had seen a sharp rise in interest in Buy-to Let properties, with better value for money than London, in addition to the direct link between Maidenhead and Heathrow airport. Property prices have risen significantly in the Maidenhead area in recent years, with the impact of Crossrail thought to be a significant factor<sup>39</sup>. Crossrail

<sup>38</sup> GVA Property Impact Study (2012)

<sup>39</sup> Lloyds Banking Group (2016) Crossrail effect puts London house prices on the fast track, available from: <http://www.lloydsbankinggroup.com/globalassets/documents/media/press-releases/lloyds-bank/2016/051216-crossrail-station-house-prices.pdf>

will also position Maidenhead only 12 minutes from the financial, business, and commercial centres of Reading and the wider Thames Valley.

- 1.19 The Council will cooperate with the Greater London Authority (GLA) regarding the review of the London Plan as appropriate, whilst acknowledging the early stage of its preparation.<sup>40</sup> The SHMA applied sensitivity testing analysis which considered the trend in migration to/from London. Migration levels in the Eastern and South Bucks HMA were already higher than historic levels of net migration from London, meaning there was no need to adjust the demographic baseline within the HMA.

#### SHMA CONCLUSIONS

- 1.20 The SHMA concluded the following OAN for the period 2013-2036 to be 712 homes per annum, which over the 20 year plan period totals 14,240:

**Table 11 Conclusions on Full Objectively Assessed Housing Need by OAN, 2013-36<sup>41</sup>**

Area	2012 based Household Projection	London Uplift	Economic Uplift	Reversing Suppressed Household Formation	Improving Affordability	OAN (Homes per annum)
<b>RBWM</b>	657		0		55	712
<b>Eastern Berks and South Bucks HMA</b>	1,871		0	0	144	2,015
<b>Study Area</b>	4,164	124	154	64	364	4,870

- 1.21 An OAN of 712dpa for the Borough up to 2036 marks a significant upwards shift from the South East Plan figure of 346 which informed earlier periods of plan making. As part of the recent plan making process a key consideration is how best to meet this need and whether this increased OAN can be met within the Borough boundary. When considered over the plan period of 2013-2033 the OAN for the Borough is 14,240 dwellings.

<sup>40</sup> Draft London Plan consultation expected in autumn 2017: <https://www.london.gov.uk/london-plan-full-review/overview-full-review-london-plan>

<sup>41</sup> Berkshire (including South Bucks) SHMA (2016): Table 139

# APPENDIX B – SITE SELECTION METHODOLOGY

## Introduction

This methodology has been developed to test the soundness of the housing allocations in the BLPSV and the process used to select them in 2016.

The principle behind the methodology is to identify a site supply and apply a series of filters to them to progressively identify which should be rejected and which should be selected for potential allocation.

The filters applied to the supply to identify those to be rejected are as follows:

- Size
- Absolute constraints
- Availability
- Sites subject to significant flood risk:
  - More than 50% in FZ3;
  - More than 50% or more in functional floodplain
  - Less than 50% in FZ1
- Non conformity with spatial strategy<sup>42</sup>
- Required for other vital uses - employment, public open space and community facilities

Other filters have been applied to identify those sites to select, and in what order. These filters are:

- Flood ranking from sequential test – lowest flood risk preferred over high flood risk sites
- Degree of conformity with spatial strategy – urban sites preferred over green belt

## Methodology

### Stage 1: Identify number of allocations required to help meet full housing need

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<sup>42</sup> The proposed spatial strategy identifies that the Borough's full development needs will largely be accommodated in 3 growth areas (Maidenhead, followed by Windsor and Ascot) with smaller provision in other settlements. The focus is mainly on existing urban areas with some release of green belt around the edges of the settlements. The principal green belt release is focussed on Maidenhead, particularly to an area south west of the railway station. Development of isolated, greenfield greenbelt sites and intensification of isolated PDL in the greenbelt would not be in accordance with this spatial strategy.

Using data on completions, commitments, windfall and small HELAA sites<sup>43</sup>, calculate required number of allocations to help meet full housing need over the plan period. A 10% buffer will also need to be added.

## **Stage 2: Identify all potential housing allocation sites in land supply**

Use the Borough's published HELAA information to identify a list of all sites potentially available to help meet allocation need.

## **Stage 3: Sequentially test all sites in site supply**

Run the list of sites through the Sequential test process

## **Stage 4: Reject unsuitable sites**

Sieve sites using the following filters to identify those that are not suitable for allocation:

- Sites too small for allocation - i.e. less than 10 dwellings.
- Sites with absolute constraints:
  - Wholly within functional floodplain (Flood Zone 3b)
  - Wholly within a Special Protection Area (SPA or SAC)
  - If being promoted for housing - completely within 400m of the Thames Basin Heaths SPA
  - Within a Ramsar site
  - Within a Site of Special Scientific Interest
  - Wholly within ancient woodland
  - Wholly within a Suitable Alternative Natural Greenspace (SANG)
  - Within notified safety zones
- Sites unavailable for allocation on the basis that they are:
  - Under construction
  - Considered by the HELAA to be not be developable in the next 15 years.
  - Have a planning permission where construction has not yet commenced but conditions are discharged and S106 in place.
  - Are Class O Prior approval applications
  - Are being promoted for non-housing uses.
- Sites not in conformity with spatial strategy.  
Using edge of settlement work and brownfield register reject:
  - Isolated greenfield sites in greenbelt;
  - PDL sites in greenbelt where intensification of development proposed.

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<sup>43</sup> Small HELAA housing sites are those delivering between 5 & 9 units.

- Edge of settlement green belt sites rejected by Edge of Settlement work.

### **Stage 5: Reject sites required for other essential uses**

Sieve sites using the following filters to remove sites needed for other essential uses where no alternative replacement site has been or can be provided:

- Sites promoted for housing that would result in the loss of all, or the majority of, existing or proposed employment floorspace.
- Sites promoted for housing that would result in the loss of all, or the majority of, existing or proposed public open space.
- Sites promoted for housing that would result in the loss of all, or the majority of, existing or proposed community facilities (including schools).
- Sites that are proposed for housing that would result in the loss of an active or proposed minerals or waste site.
- Sites that are ranked as wholly Grade 1 or Grade 2 Agricultural Land

### **Stage 6: Reject sites overly restricted by flooding and subject to significant flood risk**

The borough accommodates the River Thames and numerous small tributaries. Many of the settlements, including Maidenhead lie in the Thames river valley and some areas are in the floodplain. As such the Borough's land supply is heavily constrained by flooding. As flooding can create danger to life situations and can significantly reduce the capacity and suitability of sites, it is a significant consideration in the selection of sites for allocation. Accordingly, it is considered that sites that have one or more of the following flood characteristics are subject to significant flood risk and are not suitable for allocation:

- 60% or more of the site is in functional floodplain;
- 50% or more of the site is in FZ3
- Less than 50% of the site is in FZ1;

### **Stage 7: Select remaining sites for allocation and rank in terms of preference**

After Stages 1-5 all sites unsuitable for allocation will have been identified and rejected. If required, all of the remaining sites should be suitable for allocation. This stage sorts the sites into a preferential hierarchy based on their conformity with the spatial strategy, flood zone ranking and impact on green belt.

Sites that are 100% within FZ1 are sequentially preferred to sites with areas in FZ2 & FZ3. These sites also avoid the need for the exceptions test to be undertaken if allocated or developed. These sites are the preferred allocations for the plan and are selected first according to the following hierarchy:

- 100% FZ1 sites in urban area of Maidenhead growth location<sup>44</sup>;
- 100% FZ1 sites in urban area of Windsor and Ascot growth locations;

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<sup>44</sup> The Maidenhead growth location covers Maidenhead Town Centre and the area south west of the Maidenhead railway station. Although the town centre lies in the urban area most of the south west Maidenhead area lies outside and is green belt.

- 100% FZ1 sites in urban areas of Maidenhead, Windsor and Ascot that are outside the growth locations;
  - 100% FZ1 sites in non-green belt villages and settlement areas.
- 
- 100% FZ1 PDL sites in countryside locations where no intensification proposed;
  - 100% FZ1 edge of settlement sites that were assessed overall as making a low or moderate contribution to the 5 green belt purposes that lie within the growth locations
  - 100% FZ1 edge of settlement sites that were assessed overall as making a low or moderate contribution to the 5 green belt purposes that lie adjacent to urban settlements (including villages inset from the green belt).

Following identification of the 100% FZ1 sites, a review will be undertaken to check whether or not these sites can deliver the required number of units to meet the full housing need over the plan period.

If there are inadequate 100% FZ1 sites to meet full housing need then the next step is to consider whether adding sites with 50% - 99% FZ1 would provide the required need.

The second selection would be undertaken according to the following hierarchy:

- 50% - 99% FZ1 sites in urban area of Maidenhead growth location;
  - 50% - 99% FZ1 sites in urban area of Windsor and Ascot growth locations;
  - 50% - 99% FZ1 sites in urban areas of Maidenhead, Windsor and Ascot that are outside the growth locations;
  - 50% - 99% FZ1 sites in non-green belt villages and settlement areas.
- 
- 50% - 99% FZ1 PDL sites in countryside locations where no intensification proposed;
  - 50% - 99% FZ1 edge of settlement sites that were assessed overall as making a low or moderate contribution to the 5 green belt purposes that lie within the growth locations
  - 50% - 99% FZ1 edge of settlement sites that were assessed overall as making a low or moderate contribution to the 5 green belt purposes that lie adjacent to urban settlements (including villages inset from the green belt).

Note – sites that have a very large percentage in FZ1 and a minimal amount in FZ3 would be preferable to sites that had lower amounts of FZ1 and large amounts of FZ2.

### **Stage 8: Review whether or not adequate selected sites available to meet identified housing need**

Following stages 1 – 7 identify whether or not sufficient sites have been identified to help meet the housing allocations needed over the plan period plus 10% buffer.



If yes, then selected sites to be assessed further in terms of their deliverability and sustainability. If this results in the need to remove sites or to reduce their capacity then other sites may need to be preferentially brought forward to make up for any deficit.

If no, will need to consider:

- Firstly whether the capacity of remaining sites in terms of density or developable area could be increased; and then, secondly;
- Whether any sites rejected at stages 5 & 6 could be made acceptable. For example, there could be urban sites with just under 50% of their area in FZ1 with large amounts of the site in FZ2.

## APPENDIX C – SITES SELECTED FOR HOUSING ALLOCATION

HEELA ID No.	BLPSV HA ref	BLPSV- PC Ref	Site Name	Reasons for selection
0337	N/A	AL1	Nicholsons Centre	Top priority location free of flooding and green belt constraints. Parameters for development and design not yet set through the development management process. Large site that should make a significant contribution to regeneration of Maidenhead. Allocation required to ensure delivery of specific objectives for site and to ensure is considered as part of a wider area to enable comprehensive development and effective placemaking in Maidenhead.
0377	N/A	AL2	Land between High Street and West Street, Maidenhead	Town centre PDL site in top priority growth location free of flooding and green belt constraints. Needs to be considered as part of a wider Maidenhead Town Centre area to enable comprehensive development and effective placemaking.
0378	N/A	AL3	St Mary's Walk, Maidenhead	Town centre PDL site in top priority growth location free of flooding and green belt constraints. No pp in place so parameters for development and design not yet set through the DM process. Key connectivity site that should make a significant contribution to regeneration of Maidenhead. Allocation required to ensure delivery of specific objectives for site and to ensure is considered as part of a wider area to enable comprehensive development and effective placemaking in Maidenhead.
0376	HA5	AL4	York Road, Maidenhead	Top priority location free of flooding and green belt constraints. Planning permissions and design are not advanced far enough to negate effectiveness of allocation. Allocation required to ensure delivery of specific objectives for site and to ensure is considered as part of a wider area to enable comprehensive development and effective placemaking.

HEELA ID No.	BLPSV HA ref	BLPSV- PC Ref	Site Name	Reasons for selection
0408	HA4	AL5	West Street Opportunity Area, Maidenhead	Town centre PDL site in top priority growth location free of flooding and green belt constraints. No pp in place so parameters for development and design not yet set through the DM process. Prominent site that should make a significant contribution to regeneration of Maidenhead. Allocation required to ensure delivery of specific objectives for site and to ensure is considered as part of a wider area to enable comprehensive development and effective placemaking in Ascot.
00087	N/A	AL6	Methodist Church, High Street, Maidenhead	Town centre PDL site in top priority growth location free of flooding and green belt constraints. No planning permission in place so parameters for development and design not yet set through the DM process. Prominent site that should make a significant contribution to regeneration of Maidenhead. Allocation required to ensure delivery of specific objectives for site and to ensure is considered as part of a wider area to enable comprehensive development and effective placemaking in Maidenhead. The community facilities will either need to be retained or a site in the Town Centre for alternative facilities will need to be found.
00088a	HA1	AL7	Maidenhead Railway Station	Town centre PDL site in top priority growth location free of flooding and green belt constraints. No planning permission in place so parameters for development and design not yet set through the DM process. Key gateway site that should make a significant contribution to regeneration of Maidenhead. Allocation required to ensure delivery of specific objectives for site and to ensure is considered as part of a wider area to enable comprehensive development and effective placemaking in Maidenhead.
00080	HA3	AL9	St Cloud Way, Maidenhead	Town centre brownfield site in top priority growth location free of green belt constraints and largely flood risk free. Allocation required to ensure delivery of specific objectives for site and to ensure is considered in conjunction with adjoining St Cloud's Way site and as part of a wider area to enable comprehensive development and effective placemaking in Maidenhead Town Centre.

HEELA ID No.	BLPSV HA ref	BLPSV- PC Ref	Site Name	Reasons for selection
00412	N/A	AL10	Maidenhead Retail Park, Stafferton Way, Maidenhead, SL6 1AA	Town centre PDL site in top priority growth location free of flooding and green belt constraints. No planning permission in place so parameters for development and design not yet set through the DM process. Large prominent site that should make a significant contribution to regeneration of Maidenhead. Allocation required to ensure delivery of specific objectives for site and to ensure is considered as part of a wider area to enable comprehensive development and effective placemaking in Maidenhead.
0379	N/A	AL12	Land to east of Braywick Gate, Braywick Road, Maidenhead	Town centre PDL site in top priority growth location free of flooding and green belt constraints. No planning permission in place so parameters for development and design not yet set through the DM process. Prominent site that should make a significant contribution to regeneration of Maidenhead. Allocation required to ensure delivery of specific objectives for site and to ensure is considered as part of a wider area to enable comprehensive development and effective placemaking in Maidenhead.
0380	N/A	AL13	Desborough, Harvest Hill Road, South West Maidenhead	Very large green belt site almost completely free of flooding constraints in south West Maidenhead strategic location. Assessed in Edge of Settlement Study as having a lower / moderate contribution to Green Belt purposes. No pp in place so parameters for development and design not yet set. Allocation required to ensure delivery of specific objectives for site and that a comprehensive and placemaking approach is taken that takes account of wider South West Maidenhead area.
0385	HA10	AL16	Ascot Centre, Ascot	Top priority location free of flooding. Part of the site is within the green belt but has passed the EoSS. No planning permission in place so parameters for development and design not yet set through the DM process. Allocation required to ensure delivery of specific objectives for site and to ensure is considered as part of a wider area to enable comprehensive development and effective placemaking in Ascot.

HEELA ID No.	BLPSV HA ref	BLPSV- PC Ref	Site Name	Reasons for selection
00040	N/A	AL17	Shorts Waste Transfer Station and Recycling Facility, St Georges Lane, Ascot	Top priority location free of flooding constraints adjacent to Ascot station. Site is located within the green belt but has passed the EOSS.No planning permission in place so parameters for development and design not yet set through the DM process. Allocation required to ensure delivery of specific objectives for site and to ensure is considered as part of a wider area to enable comprehensive development and effective placemaking in Ascot.
00128	HA30	AL18	Ascot Station Car Park, Ascot	Priority location free of flooding constraints and part of Ascot placemaking area. No pp in place so parameters for development and design not yet set through the DM process. Allocation required to ensure delivery of specific objectives for site and to ensure is considered as part of a wider area to enable effective placemaking in Ascot.
00130	HA31	AL19	Englemere Lodge London Road Ascot	Small green belt site on edge of Ascot free of flooding constraints. No planning permission in place so parameters for development and design not yet set through the DM process. Allocation required to ensure green belt release and delivery of specific objectives for site.
00416	HA32	AL20	Heatherwood Hospital, Ascot	PDL green belt location free of flooding constraints. Planning permissions and design are not advanced far enough to negate effectiveness of allocation. Allocation required to ensure delivery of specific objectives for site.
00231b	HA11	AL21	Land west of Windsor, north and south of A308, Windsor	Large green belt site largely free of flooding constraints (97% FZ1) in Windsor growth location. Site was identified in the EOSS as making only a moderate contribution to the green belt .No planning permission in place so parameters for development and design not yet set. Allocation required to ensure delivery of specific objectives for site and that a comprehensive and placemaking approach is taken that takes account of wider Windsor growth area.

HEELA ID No.	BLPSV HA ref	BLPSV- PC Ref	Site Name	Reasons for selection
00224	N/A	AL22	Squires Garden Centre Maidenhead Road Windsor	Growth location on edge of Windsor. Part of larger site assessed as making a moderate contribution towards the green belt purposes in the last EOSS. Site is largely free of flooding constraints (92% FZ1). Planning permissions and design are not advanced far enough to negate effectiveness of allocation. Allocation required to ensure delivery of specific objectives for site and to ensure is considered as part of a wider area to enable comprehensive development and effective placemaking for Windsor growth location.
AL23B	N/A	AL23	St. Marks Hospital, Maidenhead	Small urban site based to the west outside of Maidenhead Town Centre. No planning permission in place. None of site is located within the green belt. The site is also 100% within flood zone 1. The site would involve the relocation of existing community facilities before the current ones are redeveloped. There are no further absolute or essential constraints on the site.
00123b	HA20	AL24	Land east of Woodlands Park Avenue and north of Woodlands Business Park, Maidenhead (West)	Large green belt site free of flooding constraints on edge of Maidenhead offering low/moderate contribution to Green Belt purposes. Site a mix of Grade 2 & 3 agricultural land quality. No planning permission in place so parameters for development and design not yet set. Allocation required to ensure delivery of specific objectives for site and to ensure that a comprehensive and placemaking approach is taken to the whole site.
00109	HA21	AL25	Spencer's Farm, Maidenhead	Large green belt site on edge of Maidenhead that only makes a moderate contribution to green belt purposes according to the EoSS. Largely free of flood risk – 84% FZ1. No planning permission in place so parameters for development and design not yet set through the DM process. Allocation required to ensure delivery of specific objectives for site.
00261	HA18	AL26	Land between Windsor Road and Bray Lake, south of Maidenhead	Small green belt site that only makes a lower / moderate contribution to green belt purposes according to the EoSS. Largely free of flood risk – 79% FZ1. No planning permission in place so parameters for development and design not yet set through the DM process. Allocation required to ensure green belt release and delivery of specific objectives for site.

HEELA ID No.	BLPSV HA ref	BLPSV- PC Ref	Site Name	Reasons for selection
00417	HA25	AL29	Minton Place, Victoria St, Windsor	Brownfield town centre site free of flooding and green belt constraints. Large mixed use site in Windsor town centre. No planning permission in place so parameters for development and design not yet set through the Development management process. Allocation required to ensure delivery of specific objectives for site and to ensure is considered as part of a wider area to enable effective placemaking in Windsor.
00204a	HA28	AL30	Windsor and Eton Riverside Station Car Park	Town centre location free of green belt constraints. Site largely free of flood risk (72% FZ1). No planning permission in place so parameters for development and design not yet set through the Development Management process. Allocation required to ensure delivery of specific objectives for site and constraints are adequately dealt with.
0384	N/A	AL31	King Edward VII Hospital, Windsor	Small urban site based to the eastern side of Windsor Town. No planning permission in place and so parameters for development and design not yet set through the Development Management process. The site is also 100% within flood zone 1. The site would involve the relocation of existing community facilities before the current ones are redeveloped. There are no further absolute or essential constraints on the site.
0381	N/A	AL32	Sandridge House, London Road, Ascot	Site is a small urban fringe site to the southern edge of north Ascot, opposite Englemere Lodge and Heatherwood Hospital. The site has an application currently pending consideration but has not yet been permitted. None of the site is located within the green belt. The site is also 100% within flood zone 1. There are no further absolute or essential constraints on the site.
0409	HA36	AL33	Sunningdale Broomhall Centre	Small part urban/part green belt site free of flood risk. No planning permission in place so parameters for development and design not yet set through the DM process. Allocation required to ensure green belt release and delivery of specific objectives for site.

HEELA ID No.	BLPSV HA ref	BLPSV- PC Ref	Site Name	Reasons for selection
00156	HA37	AL34	White House, London Road, Sunningdale	Settlement location free of flooding and green belt constraints. No planning permission in place so parameters for development and design not yet set through the Development Management process. Allocation required to ensure delivery of specific objectives for site and supply of small sites for SME.
0388	HA34	AL35	Sunningdale Park, Sunningdale	Large green belt site free of flooding constraints. No planning permission in place so parameters for development and design not yet set. Allocation required to ensure delivery of specific objectives for site and to ensure that a comprehensive and placemaking approach is taken that incorporates the adjoining proposed green infrastructure site.
00077	HA38	AL36	Gasholder Station Whyteladyes Lane, Cookham	Settlement location free of flooding and green belt constraints. No planning permission in place so parameters for development and design not yet set through the DM process. Allocation required to ensure delivery of specific objectives for site
00031d	HA40	AL37	Land north of Lower Mount Farm Long Lane Cookham	Large green belt site free of flooding constraints on edge of Cookham offering only moderate contribution to green belt purposes. Site a mix of Grade 2 & 3 agricultural land quality. No planning permission in place so parameters for development and design not yet set through the DM process. Allocation required to ensure delivery of specific objectives for site.
00413	HA39	AL38	Land East of Strande Park, Strande Lane, Cookham, Maidenhead	Small green belt site on edge of Cookham offering only low contribution to green belt purposes. Almost all of the site is in FZ1. No planning permission in place so parameters for development and design not yet set through the DM process. Allocation required to ensure green belt release and delivery of specific objectives for site.
00045	HA42	AL39	Land at Riding Court Road and London Road Datchet	Small green belt site almost wholly in FZ2 on edge of Datchet offering only moderate contribution to green belt purposes. Much of site is Grade 1 agricultural land. However, all of site is in FZ1 & 2 and site is currently being used as a construction site for smart motorway programme with significant areas of land clearance to allow for portacabin foundations and access routes. Land considered to be urbanised and agricultural land value likely to have



HEELA ID No.	BLPSV HA ref	BLPSV- PC Ref	Site Name	Reasons for selection
				been significantly diminished. No planning permission in place so parameters for development and design not yet set through the DM process. Allocation required to ensure green belt release and delivery of specific objectives for site.
<b>00199</b>	HA44	AL40	Land to East of Queen Mother Reservoir	Small green belt site offering a lower contribution to green belt purposes. The majority of the site is in FZ1 (66%). No planning permission in place so parameters for development and design not yet set through the Development Management process. Allocation required to ensure green belt release, delivery of specific objectives for site and supply of sites suitable for delivery by SME.

## APPENDIX D –SITES REJECTED FOR HOUSING ALLOCATION

HEELA ID No.	HA ref	Site Name	Reason for exclusion
0020	-	Keeleys Transport Ltd Keeleys Yard Bath Road Knowl Hill Reading	Site too small for allocation and would result in loss of employment facilities
00074	-	Land Adjacent To Lee Cottage School Lane Cookham Maidenhead (Land adj. to Butts Leigh)	Site too small for allocation. Isolated Site not suitable on flood risk grounds - none of site is in FZ1.
00082	-	Land adj Foundry Lane	Site too small for allocation. Site is isolated pdl Green Belt site with less than 50% in FZ1.
00126	-	Queens Beeches House London Road Ascot SL5 7EQ	Site too small for allocation
00140	-	Halfpennys Garage Kings Road Ascot Berkshire	Site too small for allocation
00146a	-	The Frith, Brockenhurst Road, South Ascot, SL5 9HA	Site too small for allocation
00151	-	2 Sunning Avenue Sunningdale, Ascot	Site too small for allocation
00153	-	2 and 3 Greenways Drive, Sunningdale	Site too small for allocation
00185	-	76-78 Staines Road Wraysbury Staines	Site too small for allocation
00189	-	Land at Hythe End Road, Hythe End	Site too small for allocation and subject to absolute constraints - 96% in functional floodplain
00198	-	Broom Lodge Stanwell Road Horton Slough	Site too small for allocation
0201	-	Broomhall House, Broomhall Lane, Sunningdale	Site too small for allocation
00205	-	Land to the rear of at Willowbrook, Eton	Site too small for allocation
0219	-	Land to the North of London Road, Sunningdale	Site too small for allocation. Although 100% FZ1, site is greenfield Green Belt location and was rejected in the EoSS. Not considered developable in next 15 years.
0225	-	Land to the North West of Wraysbury Reservoir, Wraysbury	Site too small for allocation and site is wholly within SPA 400m buffer zone (South West London Waterbodies).
0230	-	Land to rear of 95-105 Summerleaze Road, Maidenhead	Site too small for allocation. None of the site is in FZ1. It is also a Green Belt location that was rejected by EoSS. Not considered developable in next 15 years.
0249	-	Mapledurham Walk, Maidenhead, SL6	Site too small for allocation
0266	-	Garden land at Florence Villas	Site too small for allocation
0268	-	Scrub land south of Florence Villas	Site too small for allocation

HEELA ID No.	HA ref	Site Name	Reason for exclusion
0271	-	Land South of Weycock Cottages, Milley Road	Site too small for allocation. Isolated greenfield Green Belt location not included in EoSS. Development would be contrary to spatial strategy.
00285	-	Land at Sturt Green and Rolls Lane, Rolls Lane, Holyport, Maidenhead	Site too small for allocation
0286	-	17 Castle Hill, Maidenhead	Site too small for allocation
0292	-	151-153 Vansittart Road, Windsor	Site too small for allocation
0295	-	Radcot Close, Maidenhead	Site too small for allocation
0296	-	Shifford Crescent, Maidenhead	Site too small for allocation
0304	-	New Lodge, Drift Road, Windsor	Site too small for allocation plus also unavailable for allocation - under construction
0307	-	Palmers of Windsor Dedworth Road Windsor SL4 4LH	Site too small for allocation
0322	-	The Little House Charters Road	Site too small for allocation plus also unavailable for allocation - under construction
0325	-	Deep Meadow, 18 Garson Lane Wraysbury	Site too small for allocation. Majority of site in FZ3b (61%) with 54% in functional floodplain. Promoted for employment.
0329	-	Hurford House, Hurley	Site too small for allocation and not considered developable in next 15 years
0331	-	Hurford House (land at), Hurley	Site too small for allocation
0336	-	Coronation House, Coronation Road, Ascot	Site too small for allocation
0375	-	Land fronting Windsor Road	Site too small for allocation
00442	-	Land at White's Lane, Datchet	Site too small for allocation. None of the site is in FZ1 and 98% of site is in FZ3a. Greenfield Green Belt site that is largely Grade 1 agricultural land.
00445	-	Diwa 2 Norfolk Road Maidenhead SL6 7EE	Site too small for allocation plus also unavailable for allocation - under construction
00446	-	The Lawns Guest House 6 Boyn Hill Avenue Maidenhead SL6 4ER	Site too small for allocation
00447	-	The Queen 282 Dedworth Road Windsor SL4 4JR	Site too small for allocation
00449	-	20 And 24 Braywick Road Maidenhead	Site too small for allocation plus also unavailable for allocation - under construction
00459	-	Whitchurch House 2-4 Albert Street Maidenhead SL6 1PR	Site too small for allocation plus also unavailable - Class 0 Prior approval application
00464	-	27 - 29 Norfolk Road Maidenhead SL6 7AU	Site too small for allocation plus also unavailable for allocation - under construction
00465	-	30 - 32 Forlease Road Maidenhead	Site too small for allocation

HEELA ID No.	HA ref	Site Name	Reason for exclusion
00466	-	48 - 52 St Marks Crescent Maidenhead	Site too small for allocation plus also unavailable for allocation - under construction
00467	-	Bluebells Restaurant And Bar London Road Sunningdale Ascot SL5 0LE	Site too small for allocation
00468	-	First And Second And Third Floor Offices Blandy House King Street Maidenhead	Site too small for allocation and unavailable (Prior approval)
00473	-	Threeways And D M Kitchens Dedworth Road Windsor	Site too small for allocation
00474	-	9 Park Corner Windsor SL4 4DR	Site too small for allocation
00475	-	Rousbury Shoppenhangers Road Maidenhead SL6 2PZ	Site too small for allocation
01290	-	The Brocket, Boyn Hill Avenue, Maidenhead SL6 4EY	Site too small for allocation
01292	-	12-22 Hampden Road, Maidenhead, SL6 5HQ	Site too small for allocation
01305	-	42 Queen Street Maidenhead SL6 1HZ	Site too small for allocation
00017a	-	Plot adj 25 The Embankment, Wraysbury	Site too small for allocation and site almost wholly within Functional Floodplain (99%)
0002a	-	Little Chef London Road Sunninghill Ascot Berkshire SL5 0PN	Site too small for allocation
00069a	-	Masters boathouse, Pococks Lane, Eton, SL4 6HW	Site too small for allocation. No part of site in FZ1. 59.5% in functional floodplain. Would result in loss of education facilities.
00081a	-	Land south of Stanwell Road Berkyn Manor Farm, Stanwell Road, Horton, Slough, SL3 9PQ	Site too small for allocation. The majority of the site is in FZ3a (75.1%). Green Belt location not included in EoSS.
0015a	-	Land at the junction of Woodside and Ascot Road	Site too small for allocation
0022a	-	6 & 7 Dawnay Close. Ascot, Berkshire, SL5 7 PQ	Site too small to fit 10 units
0063a	-	The Old Malt House, Dedworth Road, Oakley Green, Windsor, Berks SL4 4LN (Site 1)	Site too small for allocation
0123c	-	Rays Court, Friary Road, Ascot, SL5 9HD	Site too small for allocation
01299b	-	St Edmunds House, Ray Mill Road West, Maidenhead	Site too small for allocation and partly affected by 10m (Area TPO) buffer.
00180	-	Thamesfield (Land At The Junction of Wharf Road And Ouseley Road And Coppice Drive Wraysbury)	Most of site within Functional flood plain
0011	-	Horizon Honey Lane Hurley Maidenhead	Promoted to add 5,500 sqm office space. Existing Employment site. Green Belt
00057	-	69 Alma Road Windsor	Employment site - promoted for Employment
00086a	-	The Landing Development, Queen Street, Maidenhead	Too far progressed in development pipeline

HEELA ID No.	HA ref	Site Name	Reason for exclusion
00118	-	Clivemont House (Spectrum House), Clivemont Road, Maidenhead	The site has planning permission - 18/02041/FULL - Erection of 2x four storey buildings to provide 80 apartments
00120	HA15	Middlehurst, 99-103 Boyn Valley Road, Maidenhead	Too far progressed in development pipeline
00113	HA16	Osborne's Garage, 55 St Marks Road, Maidenhead	Loss of employment and too far progressed in development pipeline
00142	HA35	National Grid Gasholder Site, Bridge Road, Sunninghill	Too far progressed in development pipeline, has s106 in place
00144		Brockenhurst Hotel Brockenhurst Road, South Ascot	Site unavailable for allocation - under construction
00207		Eton College Sports Hall, Eton	Promoted for indoor sports facilities. 86% of this part Green Belt site in FZ3a.
00212		Windsor Fire Station, St Marks Road, Windsor	Site unavailable for allocation - under construction
00257	part of HA23	Replacement Summerleaze office Former Site of Pomona Caravan Site Monkey Island Lane Bray Maidenhead	Considered undeliverable in Plan period. Existing minerals processing plant. No part of site in FZ1
00258	part of HA23	Land west of Monkey Island Lane, Maidenhead	Considered undeliverable in Plan period. Existing minerals processing plant.
00260		Land North and East of Tithe Barn Drive (Land Rear of 55 To 65 Windsor Road Maidenhead SL6 2DN)	Too small for allocation. Developable area too restricted by constraints such as flooding and TPO.
00262	part of HA18	Thames Hospice, Bray	Site unavailable for allocation - under construction.
0263		Land at Agars Plough	Isolated pdl Green Belt site. None of the site is in FZ1 and it is proposed for employment
0310	part of HA26	Vale House, 100 Vale Road, Windsor	Site unavailable for allocation - under construction
00312	HA13	Exclusive House, Oldfield Road, Maidenhead	Site unavailable for allocation - under construction.
00313		Land Including Thames Auto Sales And The Amber Centre And Former Unit 5 Oldfield Road Maidenhead	Site unavailable for allocation - under construction
0316		Windsor Central Station Car Park	Not proposed for housing - shopping/food & drink/assembly/leisure
0323		25 - 27 Braywick Road	Too far progressed in development pipeline
0352		Kings Chase 107-123 King Street Maidenhead SL6 1DP	Employment sites promoted for employment use
0354		BCD Meetings & Incentives Ltd Bell Tower House Bell Street Maidenhead SL6 1BU	Employment site promoted for employment 18/02425/FULL New commercial development comprising x4 storeys
0355		2 To 6 Martin Road And Units 31 And 32 Clivemont Road, Maidenhead	Employment sites - 19/00188/VAR construction of 7 commercial units in 2 blocks with associated parking and landscaping (13/02228/FULL).
0357		35 - 37 Peascod Street Windsor	Employment site promoted for Employment.

HEELA ID No.	HA ref	Site Name	Reason for exclusion
<b>0358</b>		Thames Court 1 Victoria Street Windsor SL4 1YB	Site unavailable for allocation - under construction.
<b>00407</b>	HA29	Windsor Area Police Station, Alma Road, Windsor	Site not available in next 15 years - site owners indicated site no longer available for residential development
<b>00428</b>	-	Kenilworth House and Elizabeth House, Windsor Road, Ascot, SL5 7LF.	Site unavailable for allocation - under construction
<b>00450</b>	-	9 -11 Imperial Road Windsor & 3-4 Almond Close SL4 3RY	Too far down the development pipeline
<b>00455</b>	-	Land West of Crown Lane Including Part Hines Meadow Car Park And La Roche And The Colnade High Street Maidenhead	Site unavailable for allocation - under construction
<b>00458</b>	-	Atos Maiden House Vanwall Road Maidenhead SL6 4UB	Employment site change of use granted for housing. Prior approval granted - 18/03088/CLASSO - Change of use from B1(a) (offices) to C3 (39 no. apartments) - not commenced
<b>00471</b>	-	Marandaz House Clivemont Road Maidenhead SL6 7BU	Employment site promoted for Housing. Has a Prior approval granted - 18/03372/CLASSO - Change of use of a building from Office Use (Class B1(a)) to a Dwelling house (Class C3) to create x34 apartments - not yet commenced
<b>00472</b>	-	The Farmers Boy, 2 Harrow Lane, Maidenhead	Too far down the development pipeline
<b>00031c</b>	-	Lower Mount Farm South, Long Lane Cookham Maidenhead SL6 9EE	Employment site promoted for Mixed Use (Employment, Shopping) use. Green Belt no EOSS classification but in-between a rejected and accepted parcel.
<b>00042b</b>	-	Sopwith Court, 1-5 Slough Road, Datchet, SL3 9AU	Site promoted for non-housing use
<b>0005a</b>	-	Stubbings Compound, Henley Road, Maidenhead, SL6 6QL Option 1	Site proposed for waste use
<b>00080d</b>	-	St Cloud Gate, Maidenhead	Promoted for employment - other essential uses. Entire site is located within FZ1.
<b>00086a</b>	-	The Landing Development, Queen Street, Maidenhead	Too far down the development pipeline
<b>00089b</b>	-	Shoppenhangers Manor, Manor Lane, Maidenhead	Site unavailable for allocation - under construction
<b>00108b</b>	-	Clean Linen, Furze Platt, Maidenhead	Site unavailable for allocation - too far advanced in development pipeline - demolition commenced and conditions discharged
<b>00196c</b>	-	Eric Mortimer Rayner Memorial Lakes, Horton	Site promoted for minerals and waste development. Isolated Green Belt site and 62.7% in FZ3b.

HEELA ID No.	HA ref	Site Name	Reason for exclusion
00196d	-	Land adjacent to Berkyn Manor Farm	Isolated greenfield Green Belt site with 95% in FZ3a. Development would be contrary to spatial strategy and be at significant risk of flooding. Promoted for Public Playing Fields, not housing
0024a	-	Ham Island (M&W) Ham Island Ham Lane, Windsor, SL4 2JU	Promoted for M&W. Isolated Green Belt site.
00317a	-	Former Park and Ride Car Park Land, Stafferton Way, Maidenhead	Site unavailable for allocation - under construction
00399a	-	Golf Range, Maidenhead Golf Range, Braywick Road, Maidenhead	Site unavailable for allocation - under construction
0073a	-	157-159 Boyn Valley Road, Maidenhead, SL6 4DT	Employment site promoted for Housing. Permitted application 17/01885/FULL - Construction of 35 apartments, comprising of 1 and 2 bedrooms with ground level car parking following demolition of the existing building not started yet
0004	-	Off A404 Henley Road Maidenhead SL6 6QW	Isolated greenfield Green Belt location not included in EoSS. Development would be contrary to spatial strategy.
0005	-	Stubbings Compound, Henley Road, Maidenhead, SL6 6QL Option 1	Isolated greenfield Green Belt location not included in EoSS. Development would be contrary to spatial strategy.
0006	-	Challen's Chickens Land Adjacent Honey House Winter Hill Road Cookham Maidenhead	Isolated greenfield Green Belt location not included in EoSS. Development would be contrary to spatial strategy.
0018	-	Flics Cafe yard and Wingroves nursery, Bath Road, Knowl Hill, Reading	Site is isolated Green Belt location and development would be contrary to the spatial strategy.
0019	-	Land adjacent to Keeleys Transport, Bath Road, Knowl Hill, Reading	Site is isolated Green Belt location. It is common land and not considered developable in next 15 years.
0021	-	Land to North of Milley Road Land At The South of Burdons Farm And North of Milley Road Waltham St Lawrence Reading	Isolated greenfield Green Belt location not included in EoSS. Development would be contrary to spatial strategy.
0028	-	Land west of White Waltham Church	Isolated Green Belt location not included in EoSS. Development would be contrary to spatial strategy.
00035	-	The Walled Garden White Place Farm Sutton Road Cookham Maidenhead	Site is greenfield site in Green Belt and rejected in EoSS. None of the site is in FZ1 and with the majority in FZ3a (52%) and functional floodplain (8%).
00038	-	Land at Ashurst Park Ashurst Park Church Lane Ascot	Green Belt location rejected by EoSS. Employment site
00075	-	Land to the North of Summerleaze Road, Maidenhead SL6 8HZ	Green Belt site with no FZ1 and almost entirely in FZ3a (99%) with the remainder in functional floodplain. Loss of existing community/leisure use.
00125	-	Silwood Park Nurseries Cheapside Road Ascot	Isolated Green Belt location. Development would be contrary to spatial strategy.

HEELA ID No.	HA ref	Site Name	Reason for exclusion
00127	-	Land at Oakfield Farm, Ascot	Isolated Green Belt location. Not included in EoSS. Development would be contrary to spatial strategy. Also constrained by ancient woodland. Eastern parts of the site are located within the Wells LWS and the Windsor Great Park and Woodlands biodiversity opportunity area.
00137	-	The Pavilion London Road Sunninghill Ascot SL5 0PH	Green Belt location rejected by EoSS
00139	-	Site at Larch Avenue, Sunninghill (Land Rear of Cary Cottage London Road)	Site is greenfield site in Green Belt and rejected in EoSS. Not considered developable in next 15 years.
00148	-	Land At Cherry Garden Lane/Westacott Way	Isolated greenfield Green Belt location not included in EoSS. Development would be contrary to spatial strategy.
00150	-	Kings Beeches Devenish Road Sunningdale Ascot	Green Belt location rejected by EoSS
00154	-	Land adjacent to Fifield Road, Fifield	Isolated greenfield Green Belt location not included in EoSS. Development would be contrary to spatial strategy.
00162a	-	Sunningdale Broomhall Centre	Site is greenfield site in Green Belt and rejected in EoSS. Not considered developable in next 15 years. Smaller version of the site without the green belt is selected.
00170	-	Crimp Hill, Old Windsor (North)	Site is greenfield site in Green Belt and rejected in EoSS. Not considered developable in next 15 years.
00175	-	Priory Stables Sites B, Old Windsor	Site is a greenfield Green Belt location. None of the site is in FZ1 and with the majority in FZ3a (59.0%) and FZ3b (36.8%).
00176	-	Priory Stables Site A, Old Windsor	Site is greenfield site in Green Belt. None of the site is in FZ1 and the majority lies in FZ3 (89.9%).
00178	-	Land south of The Drive, Wraysbury	Site is greenfield site in Green Belt. None of the site is in FZ1 and with the majority in FZ3a (46.2%) and FZ3b (51.00%).
00194	HA45	Land adjacent to Coppermill Road, Horton (Land To The Rear of 80 Adjacent Wraysbury Reservoir Coppermill Road Wraysbury)	Isolated Greenfield Green Belt site not considered in EoSS. Development would be contrary to spatial strategy and would perpetuate existing historic ribbon development. Constrained by the neighbouring SSSI and width of site.
00197	-	Stanwell Road, Horton (Home Close Farm, Horton)	Isolated greenfield Green Belt location not included in EoSS. Development would be contrary to spatial strategy.
00210	-	Land at Crown Farm, Eton Wick (Common Gate Farm Crown Farm Eton Wick Road Eton Wick)	Green Belt location not included in EOS. The majority of the site is in FZ3a (99.9%).
0220	-	Land to the South of Bedford Lane	Site is a greenfield Green Belt site rejected in EoSS. Not considered to be developable in next 15 years.
0226	-	Land at Lodge Farm - Option 2	Site is greenfield Green Belt location and was rejected in the EoSS. Loss of Grade 3 agricultural land. Not considered developable in next 15 years.



HEELA ID No.	HA ref	Site Name	Reason for exclusion
0227	-	Land at Lodge Farm - Option 3	Green Belt location rejected by EoSS
0229	-	Land adjacent to Pelling Hill, Old Windsor, SL4	Site is greenfield Green Belt location and was rejected in the EoSS. Not considered developable in next 15 years.
00234	-	Land at Oakley Green Lodge	Isolated Green Belt location and most versatile agricultural land. Development contrary to spatial strategy.
0236	-	Ashgood Farm, Stanwell Road, Horton, SL3 9PA	Isolated greenfield Green Belt location not included in EoSS. Development would be contrary to spatial strategy and not developable in next 15 years
0237	-	Moram Lodge, Datchet Road, Old Windsor	It is also a Green Belt location that was rejected by EoSS. None of the site is in FZ1 and with the majority in FZ3a.
0242	-	Down Place, Water Oakley, Windsor, SL4 5UG	Site is isolated greenfield Green Belt location and development would be contrary to spatial strategy. Not considered developable in next 15 years. Would also involve the loss of Grade 1 agricultural land.
0244	-	Fifield Polo Club	Isolated Green Belt site. Development would be contrary to spatial strategy. Would result in loss of sporting facilities/community space.
0245	-	Fifield Polo Club Yard and Buildings	Isolated Green Belt site. Development would be contrary to spatial strategy. Would result in loss of sporting facilities/community space.
0246	-	Land to the rear of The Queens Head, Windsor Road, Water Oakley, Windsor, SL4 5UL	Isolated greenfield Green Belt location not included in EoSS. Development would be contrary to spatial strategy.
0247	-	Burdon Farm, Milley Road, Waltham St Lawrence	Site is isolated Green Belt location and development would be contrary to the spatial strategy. Not considered developable in next 15 years. Site is also entirely Grade 2 agricultural land.
0255	-	Land at Church Field, Eton	Isolated greenfield Green Belt site and development would be contrary to spatial strategy. None of the site is in FZ1 and 100% of site is in FZ3a
00256	-	Bray Marina Monkey Island Lane Bray Maidenhead	Greenfield Green Belt location. None of the site is in FZ1 with the majority in FZ3b (59.9%).
0259	-	Land at Manor Farm, Eton	Isolated Green Belt location not included in EoSS. Development would be contrary to spatial strategy. The majority of the site is in FZ2 (76.3%).
0269	-	Ledger Farm, Forest Green Road, Fifield	Isolated greenfield Green Belt location not included in EoSS. Development would be contrary to spatial strategy.
0272	-	Land adjacent to Down Place/ Bray Studios	Site is isolated greenfield Green Belt location and development would be contrary to spatial strategy. Not considered developable in next 15 years. Would also involve the loss of Grade 1 agricultural land.
0275		Grange Farm, Cookham	Site is a greenfield Green Belt location rejected in the EoSS. Not considered developable in next 15 years.

HEELA ID No.	HA ref	Site Name	Reason for exclusion
0276	-	Former Hurst Lodge School/Earleywood	PDL site in the Green Belt where intensification of development is proposed.
0277	-	Land north of The Guild House, Monkey Island Lane	Site is a greenfield Green Belt location rejected in the EoSS. Not considered developable in next 15 years.
00279	-	Land at Lodge Farm & Philberds (Lodge Farm And Water Tower, Ascot Road, Holyport, Maidenhead)	Green Belt location rejected by EoSS
0284	-	Riding Court Farm, Riding Court Road, Datchet	Green Belt location not included in EOSS The majority of the site is in FZ3a (38.3%) or FZ2 (34.0%).
0291	-	Berkshire College of Agriculture - Sewage Works	Site is in an isolated Green Belt location and development would be contrary to spatial strategy. Not considered developable in next 15 years. Development is also considered unsuitable due to the loss of Grade 1 agricultural land and for heritage and TPO reasons.
00294	-	Land at Hawthorn Hill, part of Braywood Farm (Land North of Braywood Farm, Ascot Road, Maidenhead)	Isolated Green Belt location and development would be contrary to spatial strategy. Also best and most versatile agricultural land.
0300	-	Land north of Maidenhead Road (Windsor Racecourse)	Isolated Green Belt site. Development would be contrary to spatial strategy. No part of site in FZ1. 53.4% in functional floodplain
00306	-	Land east of Cherry Garden Lane, Littlewick Green, Maidenhead	Isolated greenfield Green Belt location not included in EoSS. Development would be contrary to spatial strategy.
0318	-	Stubbings Nursery	Isolated site in the Green Belt. Development would be contrary to spatial strategy. Most of the nursery is in the walled garden of the Grade 2 listed Stubbings House.
0319	-	Land on the west side of Fifield Road , Bray, SL6 2DY	Site is Green Belt location and was rejected in the EoSS. Not considered developable in next 15 years.
0320	-	Philo Field, Cookham	Isolated greenfield Green Belt location not included in EoSS. Development would be contrary to spatial strategy.
0326	-	Land at Queens Acre Cottage, Windsor Road, Berkshire, SL4 5UJ	Isolated Green Belt site. Development would be contrary to spatial strategy.
0327	-	Land off Bartletts Lane, Holyport (also known as Moneygrow Green (Land rear of 4 Dairy Court)	Isolated Green Belt location. Not included in EoSS. Development would be contrary to spatial strategy. Also, most versatile agricultural land.
0328	-	Land at Tarbay Farm, Tarbay Lane	Isolated greenfield Green Belt location not included in EoSS. Development would be contrary to spatial strategy.
0332	-	Wardour Lodge, Sunningdale	Site is greenfield Green Belt location and was rejected in the EoSS. Not considered developable in next 15 years.
0333	-	White Waltham Airfield	Site is Green Belt location and was rejected in the EoSS. Not considered developable in next 15 years.

HEELA ID No.	HA ref	Site Name	Reason for exclusion
0334		Land to South of Church view and East of Grove Park Business Estate	Site is greenfield Green Belt location and was rejected in the EoSS. Not considered developable in next 15 years.
0341		Land south of Crimp Hill, Old Windsor	Site is Green Belt location and rejected in EoSS. Not considered developable in next 15 years.
00410		Crown Farm, Eton Wick Road, Eton Wick (Site A)	Green Belt site rejected in EoSS. None of the site is in FZ1 and 100% of site is in FZ3a.
00421		Willow Manor, Fifield Road, Fifield, Maidenhead, SL6 2PG	Isolated Green Belt site. Development would be contrary to spatial strategy.
00423		Oakley Green Mushroom Farm Oakley Green Road Oakley Green Windsor SL4 5UL - Option B	Isolated greenfield Green Belt location not included in EoSS. Development would be contrary to spatial strategy. Less than 50% of the site in FZ1
00439		Thriftwood Farm (extension to Ockwells Park) Maidenhead	Green Belt location rejected by EoSS. 67% of site in functional floodplain.
00441		Broadlands Farm and Broadlands Farm Cottage, Bagshot Road, Ascot	Site is a Green Belt site rejected in EoSS. Not considered to be developable in next 15 years.
00443		Land East of Tarbay lane and South of Dedworth Road, Oakley Green, Windsor, Berkshire	Green Belt location rejected by EoSS
01112		Land to the South of Woodlands Park Woodlands Park Maidenhead Berkshire SL6 3JB	Site is Green Belt location and was rejected by EoSS. Not considered developable in next 15 years. Would also involve the loss of Grade 1 agricultural land.
01314		Land adjacent to Braywood Farm	Isolated greenfield Green Belt location not included in EoSS. Development would be contrary to spatial strategy.
90256		Land South of Eton Wick Road and adjacent to Railway Viaduct	Isolated greenfield Green Belt location not included in EoSS. Development would be contrary to spatial strategy. The majority of the site is in FZ3a (49.5%). West of the main part of the site is almost entirely in FZ3b (15.8%).
90270		Land west of Bray Upper Road, Bray, SL6 2DA	Green Belt location. The majority of the site is in FZ3a (95.5%).
90335		Land off Duncannon Crescent (A)	Site is greenfield site in Green Belt location and was rejected in the EoSS. Not considered developable in next 15 years.
90337		Land at St Leonards Farm	Site is greenfield site in Green Belt location and was rejected in the EoSS. Not considered developable in next 15 years.
00014a		Land at Park Lane, Horton SL3 9PR	Isolated Green Belt site with less than half in FZ1 and 29% in Functional floodplain
0001a		Land at Stubbings Farm - East of Burchetts Green Road	Isolated greenfield Green Belt location not included in EoSS. Development would be contrary to spatial strategy.

HEELA ID No.	HA ref	Site Name	Reason for exclusion
0001c	-	Land at Stubbings Farm - East of Burchetts Green Lane & Burchetts Green Road	Site is isolated greenfield site in Green Belt and would result in loss of best and most versatile agricultural land. Development would be contrary to spatial strategy and considered not developable in next 15 years.
00023a	-	Land to the East of Horton Road and to the West of the Colne Valley Way, Horton, Berkshire, SL3 OLP	Green Belt location rejected by EoSS
0002c	-	Land To The North of Greenacres Switchback Road North Maidenhead (Cemetery Field, Maidenhead)	Site is greenfield Green Belt location and was rejected in the EoSS. Not considered developable in next 15 years. Would also involve the loss of best and most versatile agricultural land
00033a	-	Hangers at White Waltham Airfield Waltham Road Maidenhead	Green Belt location rejected by EoSS
00034a	-	Coningsby Farm, Coningsby Lane, Fifield, Maidenhead, SL6 2PF	Isolated greenfield Green Belt location not included in EoSS. Development would be contrary to spatial strategy.
00042a	-	Ascot Racecourse - Car park to the south of High Street	Green Belt location rejected by EoSS
00042d	-	Ascot Racecourse High Street Ascot	Site is greenfield site in Green Belt and rejected in EoSS. It is also being promoted for leisure uses.
00043a	-	Land East of School Lane Littlewick Green	Isolated greenfield Green Belt location not included in EoSS. Development would be contrary to spatial strategy.
00072a	-	Ridgeway Site Cannon Lane, Maidenhead	Site is Green Belt location and was rejected in the EoSS. Not considered developable in next 15 years.
00103a	-	Berkyn Manor Farm, Stanwell Road, Horton, Slough, SL3 9PQ	Isolated pdl Green Belt site. Site or part of site in draft M&W Plan for mineral extraction/Green energy from waste. Likely to be included in Reg 19 M&W Plan
00106a	-	Beechgrove, Church Lane, Sunninghill	Site is a Green Belt site rejected in EoSS. Not considered to be developable in next 15 years.
00113a	-	Woodlands Park Avenue/Snowball Hill Woodlands Park Maidenhead Berkshire SL6 3LU	Green Belt location rejected by EoSS
00116a	-	Land to the north of Church View White Waltham Maidenhead Berkshire SL6 3JQ	Site is greenfield Green Belt location and was rejected in the EoSS. Not considered developable in next 15 years.
00117a	-	Land to the South of Vicarage Gardens White Waltham Maidenhead Berkshire SL6 3JE	Isolated greenfield Green Belt location not included in EoSS. Development would be contrary to spatial strategy.
00118a	-	Land to the West of Grove Park White Waltham Maidenhead Berkshire SL6 3SD	Isolated greenfield Green Belt location not included in EoSS. Development would be contrary to spatial strategy.
00128a	-	Land North of Furze Platt Road, Maidenhead	Green Belt location rejected by EoSS
00136a	-	Land at Ascot Wood, Ascot	Isolated greenfield Green Belt location not included in EoSS. Development would be contrary to spatial strategy.

HEELA ID No.	HA ref	Site Name	Reason for exclusion
0013a	-	Berkshire College of Agriculture - Honey Lane	Isolated greenfield Green Belt location not included in EoSS. Development would be contrary to spatial strategy. Potential impact on ancient woodland and the loss of best and most versatile agricultural land.
0013b	-	Land South of Berkshire College of Agriculture, Burchetts Green Road, Maidenhead, SL6 6QR	Isolated greenfield Green Belt location not included in EoSS. Development would be contrary to spatial strategy.
00149a	-	Ffiennes Farm, Littlewick Green, Maidenhead Berkshire	Isolated greenfield Green Belt location not included in EoSS. Development would be contrary to spatial strategy.
00150a	-	Land Adjacent A4 Frogmore Farm, Littlewick Green, Maidenhead Berkshire	Isolated greenfield Green Belt location not included in EoSS. Development would be contrary to spatial strategy.
00161c	-	Land at Broomhall Lane, Sunningdale	Green Belt location rejected by EoSS
00162b	-	London Road Car Park and Land north of London Road, Sunningdale	Site is Green Belt location and rejected in EoSS. Not considered developable in next 15 years.
00196a	-	Land adjoining Eric Mortimer Rayner Memorial Lakes	Isolated greenfield belt site. Development would be contrary to spatial strategy.
00196b	-	Berkyn Manor Farm, Stanwell Road, Horton	Isolated pdl in Green Belt. Development would be contrary to spatial strategy. Appears to be site or part of site in draft M&W Plan for mineral extraction/Green energy from waste. Likely to be included in Reg 19 M&W Plan.
00235d	-	Land off Duncannon Crescent St. Leonards Farm (B)	Site is greenfield site in Green Belt and rejected in EoSS. Considered not developable in next 15 years.
00235e	-	Land at St Leonards Hill, Windsor	Green Belt location rejected by EoSS
00235f	-	Land at St Leonards Hill, Windsor	Site is greenfield Green Belt location and was rejected in the EoSS. Not considered developable in next 15 years.
00250a	-	Land at Water Oakley Farm	Isolated part greenfield, part previously developed site in Green Belt. Now has planning permission for housing.
00252a	-	Land at Homefield, Fifield Road and 274 Windsor Road Bray	Green Belt location rejected by EoSS
00253c	-	Land to rear of 226, 230 and 232 Windsor Road and 7, 8 & 9 Oakley Gardens (Area 1)	Green Belt location rejected by EoSS
0030a	-	The Old Orchard, Dedworth Road, Windsor	Greenfield Green Belt site with the majority in priority habitat.
00311c	-	Firtree Farm, Ockwells Road, Maidenhead	Site is also a greenfield Green Belt location that was rejected by EoSS. Less than 50% of site is in FZ1 (23%) with 34% in functional floodplain.
0031a	-	Land Rear of 99 To 119 Whyteladyes Lane Cookham Maidenhead (Land West of Whyteladyes Lane)	Greenfield land located within a Green Belt location rejected by EoSS

HEELA ID No.	HA ref	Site Name	Reason for exclusion
00423a	-	Oakley Green Mushroom Farm Oakley Green Road: Option 1	Isolated greenfield Green Belt location not included in EoSS. Development would be contrary to spatial strategy. Less than 50% of the site in FZ1
0061a	-	R/O Holyport Street, Holyport, Maidenhead (Site A)	Isolated Green Belt site. Development would be contrary to spatial strategy.
0061b	-	R/O Holyport Street, Holyport, Maidenhead (Site B)	Isolated greenfield Green Belt location not included in EoSS. Development would be contrary to spatial strategy.
0070a	-	Land adjacent to Tarbay Lane, Old Malt House, Dedworth Road, Windsor	Green Belt location rejected by EoSS
0008	-	First Church of Christ Scientist Marlow Road Maidenhead SL6 7AA	Employment site. New offices built -'Lantern Maidenhead'. Site completed.
0009	-	Land Between Terrys Lane And Poundfield Lane Cookham Maidenhead (Poundfield)	Proposed for other essential uses - green infrastructure - local green space
00037	HA33	Land at Silwood Campus, Imperial College Silwood Park Buckhurst Road Ascot	Employment and educational site promoted for housing. Green Belt site. Development would conflict with remaining educational and employment uses and be likely to intrude into undeveloped Green Belt.
00046	HA41	Land north and east of Churchmead Secondary School, Priory Road, Datchet	Development would result in the loss of Grade 1 best and most versatile agricultural land. Only 1% of site is in FZ1. Almost a third of site (32%) in FZ3a.
0061		McGraw-Hill House Shoppenhangers Road Maidenhead SL6 2RB	Employment area and Not developable in next 15 years
00066		Travis Perkins Trading Co Ltd Baltic Wharf Boyn Valley Road Maidenhead	Existing employment site
00096		School at Ray Mill Road East, Maidenhead	Would result in loss of education facilities. No part of site in FZ1. 48.1% in FZ3a
00100	HA24	Summerleaze Office and Workshop site, Summerleaze Road, Maidenhead	Employment site active minerals site. Expected to remain in use for rest of plan period. Located in Green Belt and 46.9% in FZ3a. None in FZ1.
00112		Maidenhead Lawn Tennis Club, All Saints Avenue, Maidenhead	Would result in loss of sporting facilities/community space
00115		School on College Avenue, Maidenhead	Would result in loss of community/education facilities.
00117	HA49	DTC Research, Belmont Road, Maidenhead	Although an urban 100% FZ1 site and identified for mixed housing and employment use in the BLP, the HO1 allocation would result in loss of employment space. Additionally, the site was recently granted planning permission (17/03900/FULL) for the refurbishment of the existing (retaining employment ongoing use). Works were completed June 2018 suggesting a significant commitment to the on-going employment use of the site.

HEELA ID No.	HA ref	Site Name	Reason for exclusion
00122	HA22	Land at Cannon Lane and Breadcroft Lane, Maidenhead	Conflict with Neighbourhood Plan. Site was designated in the Hurley and Waltham's 'Made' Neighbourhood Plan as Local Green Space under Policy Gen 7.
00193		Land at Wraysbury Hall (Wraysbury Hall And Land Adjacent To The North Ferry Lane Wraysbury Staines)	Employment site promoted for Housing. Green Belt not assessed in the EoSS. No part of site in FZ1
00221	part of HA26	Shirley Avenue, Windsor	Would result in loss of employment facilities. Flood risk - No part of site in FZ1. 85% in FZ3a.
0228		Station Court, High Road, Cookham	Loss of existing employment space
0248		Industrial Area, Burdon Farm, Milley Road, Waltham St Lawrence	Loss of employment. Site is isolated within the green belt.
00270	HA17	Tectonic Place, Holyport Road, Maidenhead, Berkshire	Loss of existing employment site.
0297	-	Moorbridge Court, 29-41 Moorbridge Road, Maidenhead	Loss of employment site. 100% in FZ2. Site has prior approval granted for office to residential conversion.
0298	-	Liberty House, 43-53 Moorbridge Road, Maidenhead	Loss of employment site. 100% in FZ2. Site has prior approval granted for office to residential conversion.
0330	-	Essex Lodge, 69 Osborne Road, Windsor, SL4 3EQ	Loss of employment
0335	-	Land at Ditton Farm, Austen Way, Langley	Loss of best and versatile agricultural land. Availability unknown.
0342	-	Oakley Green Lodge (West)	Loss of employment site. Isolated Green Belt not assessed in the EoSS. Development would be contrary to spatial strategy
0343	part of HA2	1-2 Reform Road (Jewson's site)	Loss of Employment use. None of the site is in FZ1. (65.9% in FZ2 and 34.1% in FZ3a).
0353		Straw Barn Mount Farm Choke Lane Maidenhead	Loss of Employment site. Isolated Green Belt location. Development would be contrary to spatial strategy
0356		32 Peascod Street Windsor SL4 1EA	Existing employment site that needs to be retained for employment use.
0359		Units 4 To 7 Foundation Park, Roxborough Way, Maidenhead, SL6 3UD, 5 - 6 Foundation Park Roxborough Way Maidenhead	Employment sites. Green Belt not included in EoS
0360		67 Alma Road (Imperial House)	Employment site promoted for mixed use. Less than 50% in FZ1 (84% in FZ2).
0362	part of HA23	Summerleaze, Monkey Island Lane, Bray, Maidenhead	Loss of employment / mineral site. Green Belt and 100% of site in FZ2.
0365		Europa House Denmark Street Maidenhead SL6 7BN	Loss of employment site

HEELA ID No.	HA ref	Site Name	Reason for exclusion
<b>0406</b>	HA14	Land south of Ray Mill Road East, Maidenhead	Loss of urban open space and former playing field. Site also has significant identified ecological value. None of the site is in FZ1 and 37% of site is in FZ3a.
<b>90247</b>		Water Oakley Farm (Land To The North of Longlea Fifield Road Fifield Maidenhead)	M&W site. Isolated greenfield Green Belt site. Development would be contrary to spatial strategy.
<b>90350</b>		Rose Lane Barns Cayton Park North Rose Lane Warren Row Reading	Employment sites. Green Belt not included in EoS. Isolated pdl
<b>00034f</b>	HA50	Land at Grove Business Park, White Waltham	Loss of existing employment site. Site is isolated pdl in the Green Belt and significant intensification would be contrary to spatial strategy
<b>00060a</b>		Land to South of Sheepecote Lane and North of Drift Road	Employment site. Isolated Green Belt site. Development would be contrary to spatial strategy
<b>00066a</b>	part of HA12	Boyn Valley Rd/Kings Grove Industrial Area (southern section)	Loss of employment site.
<b>00066b</b>	part of HA12	Boyn Valley Rd/Kings Grove Industrial Area (northern section)	Loss of employment site.
<b>0009a</b>		Land To North And East of Cookham Nursery School Station Hill Cookham Maidenhead	Excluded due to suitability constraints. Impact on nearby heritage assets, 0.14 ha in TPO 10m buffer zone. Planning application was refused due to harm to heritage, trees and loss of open space.
<b>0029b</b>	part of HA19	Former Stiefel Laboratories (Ireland) Ltd Whitebrook Park 68 Lower Cookham Road Maidenhead	Loss of employment site. None of the site is in FZ1 and 86% of site is in FZ3a.
<b>0029d</b>	part of HA19	Whitebrook Park 68 Lower Cookham Road Maidenhead	Loss of employment site in Maidenhead. None of site is in FZ1, 31% in FZ3a
<b>00315d</b>	part of HA5	Maidenhead United Football Club, York Road, Maidenhead	Would result in loss of sporting facilities/community space. Football club have given indication they will not be moving.
<b>0132a</b>		Land at Ascentia House, Lyndhurst Road, Ascot, SL5 9ED	Loss of employment site.
<b>0314b</b>	part of HA2	Reform Road, Maidenhead	Would result in loss of employment facilities. Flood risk - No part of site in FZ1 and 98% in FZ3a.
<b>0025</b>		Bellman Hanger Shurlock Row Reading	None of the site is in FZ1 and 100% of site is in FZ3a
<b>00069</b>	HA46	Straight Works, Straight Road, Old Windsor	Flood risk - No part of site in FZ1 and 99% in FZ3a. Would result in loss of employment facilities.
<b>00070</b>	HA47	95 Straight Road Old Windsor	100% of the site in FZ3a. Employment sites promoted for mixed use. Site has planning permission and is too far advanced in the development pipeline to allocate. .



HEELA ID No.	HA ref	Site Name	Reason for exclusion
00095	-	Summerleaze Lake, Summerleaze Road, Maidenhead	None of the site is in FZ1 and 100% of site is in FZ3a. No justification given for floating housing development on the lake.
00102	-	Fullers Yard, Sheephouse Road, Maidenhead	None of the site is in FZ1 and 75% of site is in FZ3a
00182	-	Coppice Field (Land At Coppice Field Coppice Drive Wraysbury Staines)	Most of site within functional flood plain (97.6%)
00186	-	Green Man Pub car park (Car Park And Field of Former Green Man 28 Station Road Wraysbury)	Most of site within Functional flood plain (90%) Whole site within 400m SPA buffer area.
00190	-	Hythe End Farm , Hythe End Road, Wraysbury, Middlesex, TW19 5AW	The majority of the site is in FZ3b (47.5%). Green Belt location not included in EOS
0222	-	Sawyers Close, Windsor	Promoted for housing but none of the site is in FZ1, 11.9% in FZ3a.
0239	-	Land on the North Side of Windsor Road Water Oakley	The majority of the site is in FZ2 (51.8%), 26% in FZ3a and 19.1% in FZ3b. Isolated Green Belt location and not included in EOSS. Development would be contrary to spatial strategy
0254	-	Nos. 31 – 50 Eton Square	Flood risk - 95% in FZ3a.
00317	-	Sewage works and allotment gardens, south of Stafferton Way and west of Green Lane, Maidenhead	Less than 50% of site is in FZ1 (36%), 8.5% in FZ3a and 0.4% in FZ3b. Loss of community facility.
0321	-	Land at 38b Station Road/Tithe Lane	None of the site is in FZ1 and 97.7% of site is in FZ2 with the remaining in FZ3a. Site lies immediately adjacent to international wildlife site and contains Grade 1 agricultural land
0324	-	Land off Horton Road, Datchet, SL3 9HL	Most of site within functional flood plain (96.5%)
0351	-	Units 3, 4 And 5 Windsor Business Centre Vansittart Estate Windsor	100% of site FZ3a. Employment site promoted for housing.
00411	-	Crown Farm, Eton Wick Road, Eton Wick (Site B)	None of the site is in FZ1 and all lies in FZ3a (89.9%). It is also a Green Belt location that was rejected by EoSS.
00427	-	Land at Green Lane, Maidenhead	None of the site is in FZ1 and with the majority in FZ3a (78%). It is also a greenfield Green Belt location that was rejected by EoSS.
0999	-	Land to the rear of 204-284 Horton Road, Datchet	None of this largely Green Belt site is in FZ1 and most is in FZ 3 including 35% in functional floodplain.
90257	-	Land adjacent to Tom Jones Boatyard, Romney Lock	Wholly within FZ3b
00029e	part of HA19	Land east of Whitebrook Park, Lower Cookham Road, Maidenhead	Flood risk - No part of site in FZ1 and 99% in FZ3 with 25% in functional floodplain. Private playing fields for adjacent employment site.
00098a		Land at Blackamoor Lane, Blackamoor Lane, Maidenhead	None of site in FZ1 with one 1/3rd in FZ3a and over 2/3rds in functional floodplain, greenfield Green Belt site on edge of settlement that makes strong contribution to 5 purposes of Green Belt. Not developable in next 15 years.

HEELA ID No.	HA ref	Site Name	Reason for exclusion
<b>00187a</b>	HA48	Tithe Farm Tithe Lane Wraysbury Staines	Site subject to flood risk (none in FZ1, 84% in FZ2 and 15.8% in FZ3a). An isolated Green Belt site. Immediately adjacent to South West London Water Bodies SPA and would result in loss of employment uses.
<b>0019a</b>		Bishops Farm Lodge Oakley Green Road Windsor SL4 4PY	None of the site is in FZ1 and the majority lies in FZ3a (96.5%). It is also an isolated greenfield Green Belt location and development would be contrary to spatial strategy
<b>00202a</b>	HA43	Land at Eton Road Datchet (St. Augustines Field, Eton Road, Datchet)	None of site is in FZ1 and largely in FZ3a (83%). Greenfield Green Belt site. Whole site Grade 1 agricultural land.
<b>00274a</b>		Land south of the A308(M), west of Ascot Road and north of the M4 (Known as the Triangle site)	Less than 50% in FZ1, 35.1% in FZ2 and 40.6% in FZ3a and therefore not suitable for housing. Green Belt site only making a moderate contribution towards green belt purposes Promoted as employment site.