

Stoke Poges Parish Council

Julie Simmonds

Clerk

01753 644803 (Office)

theclerk@stokepogeparishcouncil.gov.uk



The Village Centre
Rogers Lane
Stoke Poges
Buckinghamshire
SL2 4LP

www.stokepogeparishcouncil.gov.uk

LOCAL PLAN FOR BUCKINGHAMSHIRE REGULATION 19 CONSULTATION

REPRESENTATION PREPARED BY ONH PLANNING FOR GOOD ON BEHALF OF STOKE POGES PARISH COUNCIL

SUBMITTED TO BUCKINGHAMSHIRE PLANNING POLICY TEAM

planningpolicyteam.bc@buckinghamshire.gov.uk

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Executive summary

- The overall strategy of the Buckinghamshire Local Plan (LP4B) is unsound. In some respects it may be capable of being made sound through the modifications requested; in others it is unclear whether the required changes could be made by main modification.
- SPPC is concerned that, where the LP4B does not allocate, its policies and evidence base become the only framework through which foreseeable change will be managed — speculative housing, Grey Belt proposals and data centre development in the south of the county.
- Policy SP2 is not justified, effective or consistent with national policy, being silent on the role of neighbourhood planning in delivering the strategy.
- Policies HO1, HO2, HO9, NE16, EC5, BE5 and IN1 are variously not positively prepared, not justified and not effective, for the reasons given under each below.
- The Settlement Review and Green Infrastructure Study do not provide a proportionate evidence base for this part of the county.
- SPPC wishes to participate in the examination hearing sessions.

Introduction

1. These representations have been drafted by ONH on behalf of Stoke Poges Parish Council (SPPC) in response to the Local Plan for Buckinghamshire Regulation 19 Consultation (LP4B).
2. They cover matters of most importance relating to the tests of soundness set out in §36 of the National Planning Policy Framework (NPPF), on which SPPC makes observations and then comments.

Observations and Comments

LP4B – Policy SP2 Housing Strategy

3. SPPC is concerned that neighbourhood planning is almost entirely absent from the Housing Strategy, despite the important role that made and future neighbourhood plans can play in delivering locally-led growth and in shaping the long-term pattern of development. Buckinghamshire's coverage of made neighbourhood plans is amongst the highest in England. The omission is particularly significant in the context of revised national Green Belt policy.
4. NPPF §145 establishes that, where strategic policies identify the need for Green Belt boundary changes, detailed amendments may be made through non-strategic policies, including neighbourhood plans. National policy therefore expressly envisages neighbourhood planning as a delivery mechanism for implementing strategic spatial choices. The Spatial Strategy contains no equivalent recognition of that mechanism and therefore fails to provide a mechanism for communities such as Stoke Poges to re-engage the primacy of the plan-led system.
5. LP4B and its published evidence base provides no explanation of how neighbourhood plans are expected to contribute to the delivery of the strategy or not, how the Council intends to work with qualifying bodies in areas experiencing significant development pressure, or how locally prepared spatial evidence should inform decisions on the future pattern of growth. That is a missed opportunity to secure a genuinely plan-led approach to managing change, and it is inconsistent with the expectation at NPPF §16 that plans are shaped by early, proportionate and effective engagement and provide a positive framework within which non-strategic policies can operate.
6. The omission is particularly acute for Green Belt communities such as Stoke Poges. The introduction of Grey Belt policy has materially altered the development context, with proposals capable of coming forward through the development management process.

SPPC is aware of several planning proposals that collectively propose approximately 550 additional homes in this area, alongside the potential of two data centres and/or employment units. This includes proposals of a scale and infrastructure requirement capable of having strategic and cumulative consequences. In these circumstances communities require a clear strategic framework explaining how locally-led planning is expected to operate alongside the Local Plan. Without it, there is a real risk that the future pattern of development in this part of the county is shaped through individual planning applications rather than through coordinated spatial planning.

7. This weakens the effectiveness of the Housing Strategy. The LP4B establishes where strategic growth is proposed but says little about how change is to be managed in settlements where significant unallocated development pressures are currently being experienced and may also be in the future. **It also affects the justification for the strategy,** because the LP4B does not demonstrate that the Council has considered the role neighbourhood planning could play in delivering sustainable, locally supported solutions in areas where strategic allocations are not proposed but development pressure is nevertheless foreseeable. **SPPC is at this stage uncertain whether it is possible to correct this matter through main modifications.**

8. SPPC is considering whether to commence a review of the Stoke Poges Neighbourhood Plan in order to establish a locally derived spatial vision for the parish in light of the changing national policy context. **Should that work proceed, the Parish Council intends to prepare proportionate evidence and that evidence may be relevant to the examination of the Housing Strategy. It also illustrates why the LP4B should expressly recognise neighbourhood planning as an integral part of Buckinghamshire's plan-led approach to managing future change.**

LP4B – Policy HO1 Housing Mix

9. SPPC made this representation at the Regulation 18 consultation and has found no evidence that its comments have been considered. In fact, the objective of creating socially mixed and inclusive communities has been removed from the policy wording. SPPC therefore reiterates its concerns that Policy HO1 focuses principally on meeting identified housing need through an appropriate mix of dwelling types and sizes and gives insufficient emphasis to the wider planning objective of creating socially mixed and balanced communities. That objective is implicit within the policy but is not clearly expressed, and therefore risks receiving insufficient weight when housing mix is negotiated on individual sites.

10. This is particularly important in Stoke Poges. The evidence underpinning the made Stoke Poges Neighbourhood Plan demonstrates that the parish is characterised by a

predominance of larger detached dwellings, and that there remains a need to diversify the housing stock to improve opportunities for younger households, for older residents wishing to downsize, and for those with a local connection who wish to remain in the parish. Although national policy on affordable housing tenure has evolved, the evidence concerning the imbalance of the market housing stock and the objective of creating a more balanced community remains relevant.

11. Policy HO1 is therefore not justified. The policy relies upon housing needs evidence to determine an appropriate mix, but does not explain why the broader objective of achieving socially mixed and inclusive communities has not been given equal prominence in the policy wording. Housing mix is not solely a numerical exercise; it is an important means of creating balanced, resilient and sustainable communities over the plan period.

12. The policy is also not effective. In the absence of a clear policy objective there is a risk that negotiations on mix will focus primarily on viability or market demand, rather than on whether development positively contributes to rebalancing the existing housing stock within individual settlements. That risk is most acute in villages such as Stoke Poges, where locally prepared neighbourhood plan evidence provides a detailed understanding of existing housing characteristics and future community needs.

13. LP4B Policy HO1 should therefore be modified to make it clear that significant weight will be given to achieving socially mixed and balanced communities, whilst taking into account site-specific circumstances, local market evidence and any physical constraints affecting delivery. The supporting text should also recognise that the purpose of Policy HO1 is not simply to achieve the required numerical mix but to ensure that development contributes positively to the long-term diversity and balance of individual communities, and that, whilst flexibility may be appropriate in response to local circumstances, departures from the identified mix should be fully justified and should not be based solely on developer preference or market demand.

LP4B – Policy HO2 Affordable Housing

14. SPPC welcomes the amendments made since the Regulation 18 consultation, in particular the clarification within the supporting text to Policy HO2 that additional flexibility should be applied to schemes delivering 100% affordable housing. This largely addresses SPPC's earlier concern that the Plan might unintentionally discourage wholly affordable developments.

15. SPPC's principal concern regarding the delivery of genuinely affordable housing nevertheless remains unresolved. The Stoke Poges Neighbourhood Plan Housing

Needs Assessment demonstrated that a number of affordable home ownership products falling within the NPPF definition of “affordable housing” remain beyond the reach of many households with a local connection to the parish. The Neighbourhood Plan therefore recognises the importance of alternative forms of delivery capable of securing genuinely affordable homes for local people in perpetuity.

16. At Regulation 18, SPPC requested that LP4B expressly support the delivery of affordable housing through community-established organisations such as Community Land Trusts and almshouse associations. That request is reflected in neither Policy HO2 nor its supporting text. The policy continues to regulate the proportion, tenure and distribution of affordable housing, but provides no recognition that affordable housing may be delivered and stewarded through community-led models capable of securing long-term affordability.

17. The omission means that Policy HO2 is not positively prepared. Community-led housing has the potential to contribute towards meeting identified affordable housing needs, particularly in high-value rural communities where conventional affordable housing products often remain inaccessible to local households. LP4B does not positively support this additional delivery mechanism.

18. The policy is also not justified. The Plan contains no evidence explaining why support is limited in practice to conventional delivery models, despite representations at Regulation 18 and the growing role of Community Land Trusts, almshouse associations and similar organisations nationally. Nor does the evidence explain why these mechanisms would be inappropriate within Buckinghamshire.

19. Finally, the policy is not effective, because it provides no policy support or certainty for applicants seeking to bring forward affordable housing through community-established organisations. This may unnecessarily restrict the range of delivery mechanisms available over the plan period, particularly in settlements where community stewardship offers the greatest prospect of maintaining affordability for future generations.

20. LP4B Policy HO2 should therefore be modified to make it clear that it supports the delivery of some, or all, of the affordable housing element of residential development through suitably constituted community-established organisations, including Community Land Trusts and Almshouse Associations, where appropriate arrangements are secured to ensure that the homes remain genuinely affordable for local people in perpetuity.

LP4B – Policy HO9 Rural Exception Sites

21. SPPC welcomes the retention within Policy HO9 of support for a small proportion of market housing where robust viability evidence demonstrates that a rural exception site comprising 100% affordable housing cannot be delivered. This responds in part to SPPC's Regulation 18 representation.

22. The current LP4B policy does not, however, address SPPC's principal concern regarding community-led housing. At Regulation 18, SPPC requested that Policy HO9 expressly support community-led rural exception sites, including schemes brought forward or managed by community-established organisations such as Community Land Trusts or almshouse associations. SPPC also requested recognition that a limited element of market housing may, where justified, enable the delivery of locally identified infrastructure alongside affordable housing.

23. Policy HO9 continues to require the affordable housing to be owned and managed by a Registered Provider. That wording unnecessarily excludes, or creates uncertainty for, other legitimate community-led delivery and stewardship models capable of ensuring that homes remain affordable in perpetuity. Although the supporting text allows a community group or parish council to commission a housing needs survey, that does not amount to positive policy support for community-led housing, nor does it provide a clear route through which such schemes may be delivered.

24. Policy HO9 is therefore not positively prepared. Community-led housing can provide an additional means of addressing locally identified affordable housing needs, particularly in rural communities where conventional delivery has been limited. The policy does not make effective use of this potential delivery route, despite the acute affordability pressures recognised elsewhere in the LP4B.

25. The policy is also not justified. No explanation is provided for restricting ownership and management to Registered Providers, or for omitting community-established organisations capable of securing affordable housing in perpetuity. Nor does the LP4B explain why the community-led approach raised at Regulation 18 has not been taken forward.

26. Policy HO9 is not effective, because its wording may prevent or discourage otherwise suitable community-led schemes. A Community Land Trust, almshouse association or similar locally accountable body may not itself be a Registered Provider, even where it has appropriate arrangements in place to secure permanent affordability.

The current wording therefore creates avoidable uncertainty and may narrow the range of organisations able to deliver rural exception housing over the plan period.

27. The omission is also inconsistent with LP4B's wider objectives of supporting sustainable and inclusive rural communities, meeting locally identified needs and coordinating housing with infrastructure. Community-led schemes may be designed not only to maximise affordable housing but also to deliver modest, locally supported infrastructure, such as a new or improved walking connection. The policy currently allows market housing only to facilitate additional affordable housing and does not recognise this wider community benefit.

28. LP4B Policy HO9 should therefore be modified to recognise that affordable housing can be owned and managed by Community Land Trusts, almshouse associations or other suitably constituted community-established bodies where the affordable housing remains in perpetuity. Modifications should include recognition that a small proportion of units as market housing could also enable the delivery of locally identified and supported infrastructure integral to the scheme. NPPF §76 expressly encourages local planning authorities to support community-led housing projects on sites that would otherwise be suitable as rural exception sites and the policy should therefore also recognise this.

LP4B – Policy NE16 Protection of the Green Belt

29. SPCC supports the principle of providing a clear policy framework for limited infilling within appropriate Green Belt villages. As drafted, however, Policy NE16 lacks sufficient clarity to enable applicants, decision-makers and local communities to understand where the policy applies, and is therefore not effective.

30. Policy NE16 states that limited infilling will be supported within the built-up parts of villages "identified on the Policies Map". No infill boundaries are shown on the submitted Policies Map. The policy refers to paragraph 7.4.173 for further explanation, but no such paragraph exists within LP4B. The only relevant supporting text appears at paragraph 7.265, which identifies that Tier 4 and Tier 5 settlements washed over by the Green Belt are considered appropriate for limited infilling, but does not define the spatial extent of the built-up villages or explain how those boundaries have been identified.

31. This creates significant uncertainty, because the availability of the limited infilling exception depends on whether land falls within the relevant built-up village. Without mapped boundaries it is not possible to determine where the policy applies, or to

distinguish land capable of benefiting from the policy from land that remains subject to the general presumption against inappropriate development in the Green Belt.

32. The lack of precision is particularly important because Policy NE16 gives direct effect to the settlement hierarchy established elsewhere in the Plan, and therefore influences the principle of development in Green Belt settlements. **In its current form the policy does not provide a sufficiently clear or consistent basis for decision-making, and is neither effective nor justified by a transparent evidence base as required by §36 of the NPPF.**

33. **LP4B Policy NE16 should therefore be modified to:**

- correct the erroneous cross-reference
- identify all Green Belt village infill boundaries on the Policies Map
- explain within the supporting text the methodology used to define those boundaries.

34. Policy NE16 also lacks clarity regarding the role of Grey Belt in decision-making. Criterion 1(f) expressly permits “other forms of development specified in the National Planning Policy Framework”, thereby incorporating current and future national Green Belt policy, including the provisions relating to Grey Belt. Paragraph 7.263 then states that the policy applies to all Green Belt land regardless of its Grey Belt designation. It is therefore unclear whether Grey Belt is intended to be a material consideration in applying Policy NE16, or whether the Plan seeks to disapply the distinction created by national policy.

35. The two provisions pull in different directions. If criterion 1(f) is intended to incorporate all relevant NPPF Green Belt provisions, including those relating to Grey Belt, paragraph 7.263 should be amended to clarify that the designation of land as Grey Belt remains relevant where required by national policy. Conversely, if the intention is that Grey Belt designation should have no bearing on the application of Policy NE16, criterion 1(f) should explain how that approach is reconciled with the NPPF.

36. As drafted, the policy is not sufficiently clear to enable applicants, decision-makers or local communities to understand how proposals affecting Grey Belt will be assessed. It is therefore not effective. This matters directly in Stoke Poges, where the parish is washed over by Green Belt, adjoins a large built-up area, and is already the subject of proposals relying on Grey Belt provisions.

37. **LP4B Policy NE16 should therefore be modified** to provide a clear and internally consistent explanation of the relationship between LP4B's Green Belt policy and the Grey Belt provisions of the NPPF, including whether and how Grey Belt status is to be taken into account in applying the policy.

LP4B – Policy EC5 Data Centres

38. SPPC welcomes the changes made to the data centre policy since the Regulation 18 consultation, and in particular the strengthened requirements relating to electricity capacity, water supply, noise, air quality and landscape. Policy EC5 now expressly requires proposals to demonstrate that noise from plant, equipment and operations, including cooling systems and back-up generators, would not result in unacceptable effects on noise sensitive uses, and requires the submission of a noise assessment and mitigation where necessary. This responds in part to SPPC's earlier representation. Four concerns nevertheless remain.

Cumulative effects of multiple data centre proposals

39. Policy EC5 is principally framed around the effects and infrastructure requirements of an individual proposal. It does not expressly require consideration of cumulative effects arising from other existing, permitted or reasonably foreseeable data centre development.

40. This is particularly important in the south of Buckinghamshire. The Plan identifies the Slough–Hayes availability zone as an area of particular market demand for data centres. At the same time, the Infrastructure Delivery Plan expressly acknowledges that its assessment of electricity capacity does not factor in the risk of large-scale electricity requirements arising from data centres in this area, and confirms that, because no data centre sites are allocated, their impacts have not been tested with utility providers.

41. SPPC does not contend that the absence of allocations necessitates detailed assessment of hypothetical proposals. But where the Council's own evidence identifies a foreseeable concentration of a highly resource-intensive form of development, the development management framework should be capable of considering the combined effects of multiple schemes rather than assessing each proposal in isolation. That is relevant not only to electricity network capacity but also to water demand, noise, landscape and visual effects, air quality, atmospheric deposition and associated ecological effects, construction and operational traffic, biodiversity, and the cumulative effects on communities and environmental assets around the Slough–Buckinghamshire interface.

42. There is also a question of locational suitability which Policy EC5 does not adequately address. Where the electricity infrastructure necessary to operate a data centre cannot be provided within a reasonable timeframe without substantial reliance on on-site fossil fuel generation, that should be relevant to whether the location is suitable for the proposed use in the first place. Policy EC5 should establish that the availability and timing of appropriate electricity infrastructure, and the environmental consequences of any interim generation required, are integral to the assessment of locational suitability.

43. **Policy EC5 is therefore not effective**, because it provides no express mechanism for addressing cumulative effects in an area where multiple proposals are reasonably foreseeable. **This also raises a justification issue**, given the Infrastructure Delivery Plan's express acknowledgement that data centre infrastructure requirements have not been tested as part of the Local Plan evidence base.

44. There is a broader point. If Buckinghamshire is positioning itself to accommodate data centres within the Slough–Hayes availability zone, but its evidence base has not tested data centre utility demands and its policy does not distinguish between grid-supplied and self generating facilities, **LP4B does not yet provide an effective framework for managing one of the most environmentally consequential ways in which such development could be delivered**.

Early and meaningful community engagement

45. Criterion f) requires high-quality design and landscaping, particularly in the Green Belt and other sensitive landscapes, but does not require these matters to be informed by early and meaningful engagement with the affected community.

46. Data centres can be exceptionally large, technically complex developments with comparatively limited visible connections to the communities hosting them. Their effects may include substantial built form, extensive security infrastructure, energy and water demand, construction traffic, artificial lighting, operational plant and continuous noise. Early community involvement is therefore important not simply as a consultation exercise, but as a means of informing site layout, landscape integration, access arrangements, mitigation and appropriate local benefits.

47. **Policy EC5 is not positively prepared in this respect**, because it provides no positive mechanism for integrating data centre development with the needs and expectations of affected communities. A policy promoting early community involvement would improve the prospects of delivering schemes that respond to local circumstances

and provide identifiable benefits alongside their wider economic and digital infrastructure role.

48. The policy is also not justified. No explanation is given for omitting early community engagement from a policy dealing with a form of development whose scale, operational requirements and environmental effects require careful place-based design. That is particularly notable because SPPC expressly raised the matter at Regulation 18, because the Plan elsewhere recognises the importance of stakeholder engagement, placemaking and locally informed design, and because NPPF §16 expects plans and the development they enable to be shaped by early, proportionate and effective engagement.

49. The policy is not effective, because consultation undertaken only after a scheme has been substantially designed provides little realistic opportunity for the community to influence layout or mitigation. A clear expectation of early engagement would allow locally specific matters to be identified before the design becomes fixed, and would reduce the risk of avoidable conflict at application stage.

Precision on the noise criterion

50. SPPC welcomes criterion e), but considers that further precision is needed if it is to provide an effective basis for assessing data centre noise. Such developments may operate continuously and can generate tonal, impulsive and low-frequency noise from cooling equipment, transformers and back-up power systems. Night-time effects may be particularly significant where background sound levels are low. A general requirement to avoid “unacceptable impacts” does not make clear that these characteristics, cumulative effects and different operating scenarios must all be assessed.

51. This is a significant local concern. Stoke Poges contains established residential communities within a relatively quiet rural environment, and potentially affected residents need confidence that noise assessments will address the full operating profile of a data centre rather than relying on average daytime levels. The policy should also ensure that mitigation is designed into the scheme from the outset, rather than left to subsequent conditions where that can practicably be avoided.

On-site fossil-fuelled electricity generation

52. Policy EC5 does not distinguish between facilities supplied from the electricity network and facilities relying on on-site fossil-fuelled generation. Given the grid capacity constraints acknowledged in the Infrastructure Delivery Plan, on-site generation is a

foreseeable delivery route in this part of the county. It carries materially different consequences for carbon emissions, air quality, noise, landscape and gas infrastructure. **A policy which does not address it is not an effective framework for the development it is intended to manage.**

53. LP4B Policy EC5 should therefore be modified to:

- recognise that noise assessment must consider daytime and night-time operation, background levels, tonal, impulsive and low-frequency characteristics, cumulative effects and all reasonably foreseeable operating scenarios;
- expressly require appropriate mitigation to be incorporated into the siting, layout and design of the development;
- require the design and masterplanning of proposals to be informed by early and meaningful engagement with affected communities, including relevant town and parish councils specifically in relation to site layout, landscape integration, access, environmental mitigation and appropriate local benefits;
- assess the cumulative effects (including electricity and water infrastructure, transport networks, noise and air quality, landscape and visual amenity, biodiversity and the amenity of affected communities) of development alongside existing, permitted and other reasonably foreseeable data centre development ensuring that the necessary capacity and mitigation can be delivered;
- require appropriate justification for on-site fossil-fuelled electricity generation, including an assessment of its anticipated operation duration, annual and lifetime greenhouse gas emissions and reasonable lower carbon alternatives, or preferably expressly indicate no policy support for such proposals other than genuinely necessary emergency back-up generation.

LP4B – Policy BE5 Design of developments

54. SPPC notes that Policy BE5 continues to place considerable emphasis on achieving high quality design. That is supported, and is consistent with the objectives of the made Stoke Poges Neighbourhood Plan Policy SP6. However, LP4B Policy BE5 does not yet give sufficient recognition to adopted neighbourhood plan policies, locally prepared design codes and other local design guidance. Criterion 1 refers only to the Buckinghamshire Design Code and national planning practice guidance.

55. This omission is significant in Stoke Poges, where the made Neighbourhood Plan contains locally specific design policies and site design codes based on detailed evidence of the parish's settlement form, landscape character and design priorities. The Neighbourhood Plan also identifies local concerns about development introducing

urbanising forms, boundary treatments and designs that do not harmonise with the established street scene.

56. The supporting text to Policy BE5 acknowledges that Buckinghamshire contains distinctive towns and villages, that designs acceptable in one location may not be suitable elsewhere, and that development should respond positively to local context. Those principles are not, however, carried through into the wording of the policy itself. A reference to local design guidance and codes would provide a clearer and more reliable basis for applying adopted neighbourhood plan design policies alongside the Buckinghamshire Design Code.

57. Policy BE5 is therefore not justified, because its approach does not adequately reflect the locally specific design evidence already contained in made neighbourhood plans and associated design codes. No justification is given for affording express policy recognition to the Buckinghamshire Design Code while omitting adopted local design guidance that provides a finer-grained understanding of place.

58. Policy BE5 is also not effective. Without an explicit reference to local design guidance and codes, applicants and decision-makers may treat the county-wide code as the principal design standard even where a made neighbourhood plan provides more detailed requirements. That creates uncertainty about the relationship between the different design tools and weakens the consistent implementation of locally distinctive design principles. **It is also inconsistent with the emphasis at NPPF §132 on design policies formulated with local communities.**

59. SPPC also considers that the policy should provide clearer support for development designed to achieve the Passivhaus or an equivalent standard. Policy BE5 already directs substantial weight towards outstanding or innovative designs that promote high levels of sustainability, but does not explain how such innovation is to be balanced against local character where achieving very high energy-performance standards may require a different architectural or technical response. Stoke Poges Neighbourhood Plan Policy SP5 expressly addresses the energy-performance gap, and its site design codes identify opportunities to optimise solar access, passive design and Passivhaus design. The requested amendment would provide a positive and predictable framework for highly energy-efficient development while retaining an appropriate safeguard against unacceptable harm to local character.

60. LP4B Policy BE5 should therefore be modified to recognise the existence and continued importance of relevant made neighbourhood plan policies, local design guidance and codes, and support proposals that maximise their potential to achieve the

Passivhaus or an equivalent standard by recognising such schemes often need different building forms, plot size, plot coverage and layout to those of the character area within which the proposal is located. LP4B – Policy IN1 Infrastructure Delivery

61. SPPC supports the objective of Policy IN1 in ensuring that development is accompanied by the infrastructure necessary to make it sustainable. The policy is not, however, effective, because it does not expressly require developers or the Council to involve the relevant town or parish council when identifying local infrastructure needs and determining how developer contributions should be used.

62. The Infrastructure Delivery Plan recognises town and parish councils as infrastructure providers in their own right, particularly in relation to local facilities and open spaces. It also acknowledges that neighbourhood planning, local CIL receipts and greater coordination can help address locally identified priorities. Despite this, Policy IN1 provides no clear mechanism through which that local knowledge is to inform infrastructure requirements or section 106 negotiations.

63. The omission is important because the Infrastructure Delivery Plan identifies very significant infrastructure pressures across Buckinghamshire, acknowledges that these are unlikely to be fully funded by development, and concludes that continued coordination will be required. The scenario-planning work undertaken by SPPC and neighbouring parish councils has also identified existing capacity constraints, cumulative development impacts and infrastructure thresholds that are not apparent from county-wide evidence alone.

64. In practice SPPC has limited opportunity to participate in the negotiation of section 106 obligations, even where the resulting infrastructure will serve the parish, affect facilities managed by SPPC, or require coordination with local CIL expenditure. This creates a risk that necessary local infrastructure is overlooked, that contributions are directed towards projects that do not reflect the most pressing local needs, or that opportunities to coordinate section 106 funding, CIL and parish investment are missed.

65. **Policy IN1 is therefore not justified**, because it does not reflect the Infrastructure Delivery Plan's own recognition of the infrastructure role and local knowledge of town and parish councils. Nor is it effective, because it establishes no clear process for involving those councils in determining, coordinating and delivering infrastructure. 66. LP4B Policy IN1 should therefore be modified to improve implementation of the policy without altering the statutory responsibility of Buckinghamshire Council to determine the necessity, relevance and proportionality of planning obligations. Modification would also assist consistency with national policy by supporting the timely and coordinated

provision of infrastructure and effective engagement with local communities. Modifications should include a clear recognition that evidence provided by the relevant town or parish council should be considered when determining necessary infrastructure and that town and parish councils should be involved at an early stage in considering the coordination and delivery of infrastructure either through planning obligations or other funding mechanisms.

LP4B Evidence document – Settlement Review

67. SPPC notes that the Regulation 19 Settlement Review continues to classify Stoke Poges as a Tier 4 Medium Settlement / Large Village and Wexham Street as a Tier 5 Medium / Small Village. The underlying evidence continues to contain apparent inaccuracies and omissions which SPPC identified specifically at Regulation 18, but which do not appear to have been recorded or addressed.

68. At Regulation 18, SPPC advised that there were only two employment premises in Stoke Poges, and that Sefton Business Park had only one remaining tenant which was expected to leave. The Regulation 19 Settlement Review nevertheless records 18 employment premises for Stoke Poges, without explaining the source of that figure or how SPPC's evidence has been considered. The methodology counts business-rated offices, warehouses, factories, workshops and business units, but a count of separately rated hereditaments does not necessarily provide an accurate picture of the number, occupation or permanence of employment premises.

69. SPPC also advised at Regulation 18 that public transport provision in Stoke Poges was limited, unreliable and subject to changes reflecting demand. The Review continues to classify Stoke Poges as having "good" public transport but does not explain why the evidence provided by SPPC has not resulted in a different assessment. The Review should demonstrate that the current service satisfies its own published definition of a 7am to 7pm Monday-to-Saturday service operating at a daytime frequency of at least every 45 minutes, and should explain how reliability, service changes and the longer-term vulnerability of the route have been considered as part of the qualitative assessment.

70. The point is reinforced by the treatment of Wexham Street. At Regulation 18, SPPC advised that Wexham Street had no employment premises and that it was served by the same bus route as Stoke Poges. The Review nevertheless records "no data" for employment premises and classifies public transport as "limited". If SPPC's evidence remains correct, the employment entry should record zero rather than an absence of

information. The Council should also explain why the same principal bus service has resulted in different accessibility classifications for the two settlements.

71. SPPC's concern is therefore not primarily with the final tier assigned to either settlement, but with the apparent failure to record, verify and respond to information submitted at Regulation 18. The Settlement Review states that the 2026 update was undertaken partly in response to Regulation 18 comments, but its treatment of Stoke Poges and Wexham Street does not demonstrate how SPPC's evidence informed the final data or qualitative judgement. Without that transparency it is difficult for SPPC or the examining Inspector to understand whether local evidence has been properly taken into account, or to have confidence that the settlement hierarchy has been applied consistently. This bears directly on whether the resulting spatial strategy is justified and based on proportionate evidence.

72. The Settlement Review should therefore be amended to:

- correct the employment data for Stoke Poges and Wexham Street where appropriate
- publish the premises included within the figure of 18 for Stoke Poges together with confirmation that they lie within the settlement rather than elsewhere in the parish
- identify the evidence relied upon for the public transport classifications, including against the Review's own published service definition
- explain how SPPC's Regulation 18 representations were considered
- provide a concise settlement-specific justification where professional judgement has materially influenced the final assessment.

LP4B Evidence document – Green Infrastructure Study

73. SPPC welcomes the recognition given by the LP4B to green infrastructure, Burnham Beeches and the Colne Valley Regional Park. Policies NE7, NE8, NE11 and NE12 provide important protection for individual assets and acknowledge the biodiversity, recreational, climate resilience and cross-boundary functions of green infrastructure.

74. However, the LP4B and its supporting evidence do not properly recognise the wider strategic environmental role performed by the Stoke Poges area. The parish forms part of a connected landscape extending from Burnham Beeches and Stoke Common, through the Stoke Poges countryside, to Black Park, Langley Park and the Colne Valley Regional Park. This network performs an important role at the northern

interface of Slough, maintaining landscape separation, ecological connectivity, climate resilience and a transition between the urban area and Buckinghamshire's rural village network.

75. The Green Infrastructure Study identifies the importance of connected, multifunctional and strategically planned green infrastructure, and summarises earlier project areas covering Burnham and Farnham and the Chalfont–Gerrards Cross–Colne Valley corridor. It does not, however, identify or assess the connecting function of the land around Stoke Poges and Wexham, nor does it provide a current spatial assessment of the corridor's condition, vulnerabilities or enhancement opportunities.

76. That is a material limitation in the evidence. The Study expressly states that it will not identify specific shortfalls in existing provision. It also acknowledges that earlier strategic green infrastructure projects were not comprehensively monitored, and that it is unclear which were delivered or remain appropriate. The Study is therefore a useful review of principles and previous work, but it does not amount to a sufficiently detailed or current strategic green infrastructure assessment for this particularly pressured part of the county.

77. The omission is important given the cumulative pressures arising from the proximity of Slough, speculative housing development, Grey Belt policy, recreational pressure on Burnham Beeches, transport infrastructure and potential data centre development. These pressures could incrementally fragment the network even where individual designated assets are retained.

78. **LP4B is therefore not justified**, because the spatial strategy is not supported by proportionate evidence demonstrating how the strategic environmental function of this area has been assessed and taken into account. **It is also not effective**, because LP4B does not establish a clear spatial framework through which the corridor will be protected, connected, enhanced and delivered across administrative and parish boundaries.

79. **SPPC therefore considers it necessary to modify the LP4B** to identify the area as strategic environmental infrastructure shaping the spatial strategy rather than as a collection of separate designated sites considered principally at the planning application stage.

Conclusion

80. For the reasons set out above, SPPC considers that LP4B is unsound. The policies and evidence documents addressed in these representations are variously not positively prepared, not justified, not effective and not consistent with national policy. These representations are nevertheless made constructively.

81. A number of the failings identified are capable of being remedied by main modification: the expression of the socially mixed and balanced communities objective within Policy HO1; support for community-led delivery and stewardship within Policies HO2 and HO9; the clarification of the relationship between Policy NE16 and the Grey Belt provisions of the NPPF; the strengthening of Policy EC5 in relation to noise, cumulative effects, community engagement and on-site generation; the recognition of made neighbourhood plan policies and local design codes within Policy BE5; and the involvement of town and parish councils within Policy IN1.

82. Other matters are less readily resolved. The Housing Strategy provides no framework for decision-making or plan-making in the areas under the greatest pressure — those for which LP4B makes no allocation, but where change is most likely to come forward. Supplying that framework would require the Council to explain how the strategy is to operate in such areas and how locally-led plan-making is expected to contribute, and it is unclear whether that could be achieved by main modification without further consultation and supporting evidence.

83. The same difficulty arises with the absence of Green Belt village infill boundaries from the Policies Map, which is an omission, and where it is unclear whether boundaries could be introduced by main modification without further consultation on their extent and on the methodology by which they have been derived. The limitations identified in the Settlement Review and in the Green Infrastructure Study are likewise limitations in the evidence base rather than in policy wording. Where the evidence has not assessed the strategic function of an area or has not verified and responded to information submitted to it at Regulation 18, the deficiency is not cured by amending the policy that the evidence was intended to support. SPPC therefore invites the Inspector to consider whether further work is required in these respects before LP4B is capable of being found sound.

84. SPPC wishes to appear at the examination hearing sessions insofar as they relate to the matters raised within these representations. SPPC considers that it can assist the Inspector by providing local evidence and explaining the implications of the submitted policies and evidence.