

Stoke Poges Parish Council

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DRAFT LOCAL PLAN FOR BUCKINGHAMSHIRE CONSULTATION

SUBMITTED TO BUCKINGHAMSHIRE PLANNING POLICY TEAM

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Matter 1 (Part A): Spatial Strategy

1. SPPC notes that there are three strategic approaches to accommodate homes to meet future housing needs for Buckinghamshire which may have a direct consequence for the parish of Stoke Poges:

Approach 1: Brownfield Sites within Existing Towns and Villages
Approach 6: Limited Expansion of Villages
Approach 7: Expanding Urban Areas on the Edge of Buckinghamshire
2. It has concluded that Approach 5: Expansion near key employment areas is unlikely to be relevant to the parish of Stoke Poges as Sefton Park is not identified as a key employment area.
3. Additionally, SPPC notes that the main Approach 4: Modern Economy uses including data centres seeks to explore making allocations for data centres and that the entire parish of Stoke Poges lies within the Slough and Hayes Availability Zones¹.
4. As a parish in the Green Belt, the **made Stoke Poges Neighbourhood Plan (NP)** was unable to make site allocations in the conventional way and therefore focussed on providing an encouraging platform for **brownfield sites within the villages of Stoke Poges and Wexham Street** specifically through policies SP1, SP2 and SP3, entirely in line with Approach 1 of the draft Buckinghamshire Local Plan (LP). In this respect therefore SPPC considers that there are no other opportunities of this nature that has not already been explored by the NP and ought to provide **a clear signal to the LP that SPPC, as a Qualifying Body, considers itself capable and willing to shape future growth through a NP.**
5. The **NPs limitations** in respect of the housing Approach 6 of the LP means that there will be little opportunity for SPPC to be involved in making such allocations without a **clear policy hook within the LP of the nature encouraged by §145** of the National Planning Policy Framework (NPPF). In this respect SPPC notes the exercise of this function was successful at Runnymede (see §5.27 and Policy SD1: Spatial Development Strategy of the adopted

¹ Availability zones are geographically distinct areas within a region, each containing multiple data centres, designed to provide resilience and redundancy for cloud and digital services. Remains subject to an assessment of high voltage power and major fibre routes as well as planning and site constraints.

[Runnymede Local Plan](#)) which allowed the [Thorpe Neighbourhood Plan](#) (see Policy TH2) to bring forward allocations within the Green Belt.

6. There are a number of other LPs across the country that **rely on NPs to deliver non-strategic growth**. SPPC has not seen any explanation or rehearsal of why Buckinghamshire Council would not **consider this approach as part of its LP**, especially given its potential to deliver resource savings, including financial, and the large number of NPs, including a large proportion that allocates sites, within Buckinghamshire as a whole. SPPC would have expected to see the option **at the very least considered and the outcome of that consideration communicated** as part of this consultation.
7. **This response should be taken as a clear signal that SPPC wishes to be fully involved in the allocation of sites within the parish with a preference for such growth to be brought forward through a reviewed NP** in accordance with Planning Practice Guidance (PPG) [Paragraph: 043 Reference ID: 41-043-20140306](#). At the very least, SPPC expects to be provided with the opportunity to shape any allocations proposed as part of housing Approach 6 of the LP **prior to the publication of the final pre-submission version of the LP**. Given the intention to move straight into the final pre-submission stage next year, SPPC highlights the **importance of collaborative working with a Qualifying Body (SPPC)** that has demonstrated an ability to properly plan for future growth in respect of Buckinghamshire Council's **legal duty to support the development of neighbourhood plans** defined within the Localism Act 2011 and supported by the Neighbourhood Planning (General) Regulations, Schedule 4B of the Town and Country Planning Act 1990 and the PPG.
8. There are a number of operational issues, for example our of area school traffic and the local road network being used as rat runs that new development could exacerbate if not considered carefully. It is therefore crucial that additional development understands an holistic approach in understanding local issues and is **shaped by local knowledge and experience**.
9. SPPC is also mindful of the parish's location in respect of the urban area of Slough, and its location within the Slough Availability Zone for data centres and seeks to remain fully informed of the housing Approach 7 and the employment Approach 4 of the LP as well as the data centre allocation policy emerging. SPPC's interests in this respect lies in making sure that any proposed development of this nature considers, and appropriately mitigates, **the impact of development on the local road and sustainable travel network** given that Stoke Poges is located on a rat run route (including the objectives of Policy SP11 of the NP) and **important natural and heritage assets within the parish** (including the objectives of Policies SP7 – SP1- and SP 12 of the NP). It can also **offer extensive local knowledge** of the local area, which if considered as part of any allocation under Approaches 4 and 7, can ultimately lead to better outcomes for growth of this nature.
10. There are a number of planning applications currently being submitted, given the loss of 5 year housing land supply, and SPPC considers it important to understand what is being expected so that it can come to a view on the cumulative impact of development. Given this, it is **important that SPPC understands the LP emerging position as soon as possible**.
11. Finally, SPPC expects to see clarity within the final spatial strategy how Buckinghamshire Council may engage **§14 of the NPPF** where the five-year housing land supply and delivery tests are not being met. There is an opportunity for an incentive to qualifying bodies to review and modify their NPs over the plan period in such cases which seeks to secure plan-led growth throughout the district, but only if there is confidence that Buckinghamshire will engage §14 of the NPPF where appropriate. SPPC would welcome an understanding of Buckinghamshire Council's **position on the application of §14 of the NPPF in proposals seeking to**

utilise grey belt land in this respect which, for SPPC, will also depend on the provisions of §145 of the NPPF being engaged.

Matter 2 (Part B): Development Management Policies

Housing Mix

12. SPPC notes proposed LP Policy HO1 and is mindful of the current provisions of NP Policy SP4 in this respect. Whilst the proposed LP Policy HO1 recognises Neighbourhood Plan evidence as an important consideration, it does undermine the approach of NP Policy SP4 and the objective of creating a mixed and balanced community in the parish of Stoke Poges. In this respect, SPPC recognises that the evidence around affordable housing tenure mix could be considered out of date given national policy changes in this respect. The evidence on housing mix however, remains relevant as there has been no significant changes which has either changed the existing housing stock or affordability issues. Whilst the need for a flexible approach on housing mix is understood, SPPC considers that more attention should be drawn to the importance of creating socially mixed and balanced communities in the LP. Mindful of the limited opportunity for engagement SPPC offers a series of suggested modifications to proposed LP policies to address its concerns. With regards to housing mix, SPPC offers the following suggested modification:

HO1 Housing Mix

New residential development, including conversions, will be required to provide a mix of homes to meet current and expected future requirements in the interests of meeting housing need and creating socially mixed and inclusive communities. The mix for market housing shall be in general conformity with the council's latest evidence, and Neighbourhood Development Plan evidence where applicable for the relevant area. **In negotiating the appropriate mix, the Council will give greatest weight to achieving a socially mixed and inclusive community,** while taking account of available evidence from developers on local market conditions and any physical factors limiting a particular mix for conversions.*

...

*2.1.2 Policy HO1 sets out local market conditions should be taken into account if evidence demonstrates this is justified. It is imperative to recognise that an appropriate housing mix will vary between urban and rural locations for example, large scale flatted developments are not generally provided on small sites in villages. Equally sites in urban areas with good transport links will be more suitable for higher density flatted developments. **Or for example, in areas dominated by larger detached homes, smaller homes may be prioritised to rebalance the local mix. The overall aim is to ensure that each new development contributes positively to the diversity and balance of its community.***

*2.1.3 The draft Buckinghamshire LHNA 2025 provides conclusions on the required mix of market and affordable housing need by house type and size for the plan period, shown in the table 1 below. These conclusions take into account projected changes in the population and estimates future demand. The proportions are however a guide rather than a requirement as they may need to be varied on the basis of specific circumstances or evidence. Any variation in the proportions will need to be fully justified and variations should not take place to simply accord with a developer's preferences. **The qualitative objective of achieving socially mixed and inclusive communities remains central to all decisions on housing mix.***

Affordable housing

13. It is understood that proposed LP Policy HO2 Affordable housing seeks to encourage pepper-potting, however SPPC is concerned that it may give the impression that 100% affordable housing sites will not be supported. Additionally, the NP, through its Housing Needs Assessment, has demonstrated that 'affordable housing', as defined by the NPPF, continues to remain an unaffordable product in the parish of Stoke Poges. SPPC therefore considers that the LP should not solely focus on supporting Registered Providers but indicate support for other suitable bodies established to provide truly affordable housing in perpetuity for local people, such as Community Land Trusts or Almshouse Associations and offers the following suggested modifications in these respects:

HO2 Affordable housing

...

1. ...

c) The social benefits of providing a 100% affordable housing scheme will carry significant weight in the planning balance.

d) The delivery of some, or all, of the affordable housing element of residential development through a community established association such as a Community Land Trust or Almshouse Association, for the purpose of delivering truly affordable homes for local people in perpetuity, will be supported.

Rural Exception Sites

14. SPPC notes that there is work being undertaken on a proposed LP policy for community-led development as set out in §76 of the NPPF. These kinds of development can also often involve the pursuit of not only maximising affordable homes but the delivery of a locally identified piece of infrastructure, such as a new footpath. SPPC offers the following suggested modifications in these respects which can of course be considered as part of the development of a community-led housing policy focus:

HO9 Rural Exception Sites

*g) there are satisfactory arrangements to ensure that the affordable housing owned and managed by a Registered Provider, **or community established associations**, and remains affordable housing in perpetuity; and*

...

Community-led housing projects will be supported as Rural Exception Sites if they meet the requirements of a) – h) above. *The council will support a small proportion of units as market housing where robust evidence establishes that viability issues would prevent the delivery of a Rural **or community-led** Exception Site which is 100% affordable housing. **This can also include the delivery of locally identified and supported infrastructure.** The amount of market housing will be the minimum level needed to make the development viable and ensure the provision of additional affordable housing **or local infrastructure** to meet local needs. Where market housing is provided it should be indistinguishable in appearance and be integrated into the site.*

Windfall

15. SPPC notes that Stoke Poges has been classified as a large village (Tier 4) within the settlement hierarchy on the basis of having all 7 key services, 2 out of the 6 non-key services, 5 employment premises, its 3.4 miles distance to Slough and good public transport availability.

There are only 2 employment premises in Stoke Poges. Sefton Business Park has only one tenant left leaving imminently. Carousel operates the bus services through Stoke Poges². There is therefore a limited public transport in Stoke Poges. The service is not reliable and is often changed to reflect demand. SPPC therefore considers that it is very possible that within the lifetime of the LP that public transport services may shift into extremely limited/none category. This information should therefore be updated and Stoke Poges re-evaluated in terms of the settlement hierarchy. A regular review of the settlement hierarchy should also be considered.

16. SPPC also notes that Wexham Street has been classified as a medium/small village (Tier 5) within the settlement hierarchy on the basis of having 3 of the 7 key services, no non-key services, no data on employment premises, its 3.6 miles distance to Slough and limited public transport availability. There are no employment premises in Wexham Street. The same bus route serving Stoke Poges serves Wexham Street and therefore the comments above apply.
17. Proposed LP Policy HO10 proposes to allow windfall development, however SPPC considers that the policy ought to make it clear that its provisions will apply to settlements within tiers 1-5 outside of the Green Belt, given the provisions of the NPPF on development in the Green Belt. SPPC offers the following recommendation in this respect:

HO10 Windfall

*1. Development on unallocated sites in settlements within tiers 1 – 5 **outside of the Green Belt** will be permitted provided...*

18. SPPC also notes the development of a Grey Belt policy as part of the emerging policies and urges the LP to consider establishing a clear position on a proportionate scale of growth in respect of Grey Belt proposals as proposed here for Windfall development. Allowing NPs to establish this position would also be welcomed. SPPC seeks to remain fully informed of the progress of the Buckinghamshire Green Belt Study and urges collaboration with a number of communities in the Green Belt undertaking their own Grey Belt studies, including potentially SPPC.

Data centres

19. SPPC notes proposed LP Policy EC4 seeks to set out a number of mitigation criteria to guide proposals for new data centres but considers that the policy could be improved to achieve the balanced, place-positive approach sought by §87 of the NPPF.
20. Clause b) is particularly narrow in its approach in terms of meeting community expectations for accommodating this kind of infrastructure on their doorstep. SPPC is also aware that many data centre projects can fail due to growing push back from local communities on infrastructure of this nature. This can be associated with its intangible nature compared to other pieces of infrastructure. SPPC therefore considers that the current LP consultation does little to help deal with these issues and considers that there ought to be a clear indication from the LP that developers bringing forward such schemes should invest in and commit to community led masterplanning³. Whilst it is understood that Buckinghamshire Council's role is limited to encouragement in this respect (as per §41 of the NPPF), the LP should acknowledge the benefits of community involvement in relation to the development of data centres. SPPC is

² <https://www.carouselbuses.co.uk/services/CSLB/106?date=2025-11-03&direction=outbound>

³ <https://www.arup.com/insights/the-good-neighbour-theory-how-data-centres-can-strike-a-better-balance-between-technology-community-and-nature/>

also concerned that the policy does not recognise potential noise pollution as a matter which needs to be considered. SPPC offers the following modifications in this respect:

EC4 Data Centres

...

- b) *Their visual impact should be mitigated by high quality, **context-responsive** design and landscaping, especially within the Green Belt or other sensitive landscapes and areas **and informed by an early, community-led masterplanning process to co-design site layout, landscape integration, access and local-benefit measures.***
- c) ***Their noise impact is considered in line with the provisions of Policy NE20.***

Design of Developments

21. SPPC notes the focus on high-quality design as per draft LP Policy BE6, in line with the objectives of NP Policy SP6, but seeks to ensure that the role of local design preferences, encouraged by the NPPF (Section 12), is made clearer. The objectives of NP Policy SP5 in recognising the potential for a different design response for Passivhaus, or equivalent standard, schemes should also be recognised. SPPC offers the following modifications:

BE 6 Design of Developments

1. *All new development proposals must strongly align with the latest Buckinghamshire Local Design Code, **local design guidance and codes**, and the following ten design characteristics of the National Design Code...*

...

- i) *Resources: New developments must be efficient and resilient, following the energy hierarchy, using sustainable materials, and incorporating measures to mitigate and adapt to climate change. **Schemes that maximise their potential to meet the Passivhaus or equivalent standard will be supported provided it can be demonstrated that the scheme will not have an unacceptable effect on the character of the area.***

Infrastructure delivery

24. SPPC notes the provisions of emerging LP Policy IN1. In this respect it is crucial that town and parish councils are considered as important organisations to be involved in the negotiation of infrastructure delivery. Often, SPPC do not have the opportunity to be involved in shaping S106 negotiations and considers that this should change and be promoted by the LP.

IN1 Infrastructure Delivery

...

2. *When determining necessary infrastructure, developers must consider the current level of infrastructure, any standards detailed in this Local Plan, **and** the requirements in the Infrastructure Delivery Plan, **and the involvement of the relevant town and parish council.***

Other Matters

25. SPPC has received a copy of CAMRA's response to this consultation. In this respect it is noted how important it is for pubs, especially those in village locations, to be recognised for their

value as has been done in some respects by the Department for Business and Trade⁴. SPPC supports policy amendments which recognises the importance of pubs.

26. SPPC has also received a copy of the Stoke Poges Taskforce's response to this consultation. In this respect SPPC supports the proposed amendments to draft LP policy SE5 Sport, Leisure and Recreation as there is a clear omission of policy seeking to retain existing sport and recreation assets.

27. SPPC also supports the objectives of the following draft LP policies:

- HO3 Accessible Housing
- EC2 Other Employment Sites
- EC3 Skills and Local Employment
- EC8 Rural Diversification
- EC12 Development for main town centre uses outside Buckinghamshire's centres
- NE1 Water Quality
- NE2 Watercourses and associated corridors
- NE3 Protection and enhancement of sites of high biodiversity and geodiversity importance
- NE4 Protection and Enhancement of notable species
- NE5 Biodiversity Gain and Nature Recovery
- NE6 Green Infrastructure
- NE7 Resisting the Loss of Existing Green Space
- NE8 Trees, Ancient and Veteran Trees, Woodlands, Orchards
- NE9 Ecological enhancements
- NE10 Mitigating light impacts
- NE12 Special Areas of Conservation, Special Protection Areas and Ramsar Sites
- NE16 Protection of the Green Belt
- NE19 Landscape Character and Visual Amenity
- NE20 Pollution, Air quality and Contaminated Land
- TR1 Transport requirements in new developments
- TR2 Transport improvements
- TR4 Public Rights of Way
- TR6 Aviation development
- IN2 Water infrastructure
- IN3 Telecommunications Infrastructure
- BE2 Space Standards
- BE3 Conservation Areas
- BE4 Heritage Assets
- BE5 Residential amenity
- SE3 Community food growing
- SE4 Community facilities, infrastructure and assets of community value
- CC1 Flood Risk
- CC2 SuDS
- CC3 Water efficiency standards

Emerging Policies

28. Sustainable Construction – SPPC supports the recommendations of the Buckinghamshire Council Local Planning Support on Net Zero Carbon Literature Review in respect of using true net zero building metrics, requiring on-site renewables including maxing out roof solar, banning

⁴ <https://www.rsnonline.org.uk/funding-boost-to-help-village-pubs-serve-communities>

fossil fuels in new builds, tackling the energy performance gap, requiring whole-life-cycle carbon emission assessments, and considering an offset fund mechanism.

29. Retrofitting – SPPC recognises the importance of retrofitting and notes the emerging body of evidence, particularly in respect of heritage assets, [published by Historic England](#) encouraging whole building retrofit approaches.
30. Energy Infrastructure – SPPC notes that there is little potential for renewable energy schemes within the parish of Stoke Poges as recorded in the Buckinghamshire Climate Change Study Renewable Energy Assessment.