

Stoke Poges Parish Council

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Laura Peplow
Case Officer, Planning
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By email

Copied to:

Mr Eric Owens, Service Director, Planning and Environment;
Councillor David Moore, Chairman, East and South Buckinghamshire Area Planning Committee;
Councillors Dev Dhillon, David Moore, Thomas Hogg, Farnham and Stoke Poges Ward Members

Dear Ms Peplow

Applications PL/26/06177/OA, land west of Wexham Street, and PL/26/06178/OA, land east of Wexham Street, Stoke Poges

Request that both applications be called in for determination by committee, and the Parish Council's position on refusal

Stoke Poges Parish Council writes separately from its representations on the planning merits, which are submitted today and to which a copy of this letter is appended. The purpose of this letter is to ask that both applications be referred to the East and South Buckinghamshire Area Planning Committee for determination by members, and that they be reported to the same meeting and considered together. It also sets out the Parish Council's position on the consequences of refusal, so that those consequences are not mistaken for something they are not.

The Parish Council is aware that three members of the Council have requested that PL/26/06178/OA be called in for committee determination. The Parish Council supports those requests and asks that they be granted.

No equivalent request appears to have been made in respect of PL/26/06177/OA. That is the Parish Council's principal concern in writing. The two applications are two parts of one proposal,

and it would be an unsatisfactory outcome if one were considered by members in public while the other, differing only in the side of Wexham Street on which it sits, were determined under delegated authority.

The applicant's own Planning Statements confirm, at paragraphs 1.9 and 1.10 of each, that these applications form part of a single project for the purposes of environmental impact assessment, described by the applicant as residential development of up to 680 dwellings. A voluntary Environmental Statement has been submitted on the express basis that, where an application forms part of a wider project and the impacts are interrelated, the assessment must cover the project as a whole. The Parish Council agrees and considers that what follows for assessment must follow equally for determination.

Both applications fall outside Schedule 1 to the Town and Country Planning (Planning Committees) Regulations 2026, which takes effect on 31 October 2026, and fall within Schedule 2. Should determination fall after that date, referral will be a matter for the agreement of the nominated officer and the nominated member. The Parish Council considers that both statutory referral criteria are met and asks that this letter be treated as its formal request under that scheme, and equally as its request under the Council's existing arrangements should determination fall before that date.

As to the first criterion, these proposals raise economic, social and environmental issues of evident significance to the local area. They would place up to 680 dwellings on approximately 43.7 hectares of Metropolitan Green Belt, comprising 28 hectares east of Wexham Street and 15.69 hectares to the west, with both principal accesses taken from that same road. Development on that scale would change the relationship between Slough and the villages of Stoke Poges and Wexham Street permanently. It would also remove 18 of the 27 holes at Wexham Park Golf Centre, one of England's most successful junior golf environments.

Whether the housing would meet local need is also in issue. The Housing Needs Assessments prepared by AECOM for the Stoke Poges and Wexham Neighbourhood Plans show that affordable home ownership products are, with very limited exceptions, beyond the reach of households on local earnings, and that only rented tenures come close to meeting the needs of lower-income households.

As to the second criterion, the proposals raise a significant planning matter when regard is had to the development plan and to other material considerations. The applicant proposes that the land is grey belt. The Parish Council does not accept that premise, for the reasons set out in its representations. If the premise fails, the development is inappropriate development in the Green Belt, to which substantial weight attaches, and falls to be assessed against very special circumstances.

The Parish Council asks that the Council confirm in writing that both applications will be reported to the East and South Buckinghamshire Area Planning Committee; that they will be reported to the same meeting; that the Parish Council will be given notice of that meeting; that the Parish Council will be afforded the opportunity to address the committee; and that, in the event that the Council

proposes to refuse either application, the Parish Council's representations be included in the material sent to the Planning Casework Unit under the Town and Country Planning (Consultation) (England) Direction 2026.

Should the Council conclude that referral to committee is not appropriate, the Parish Council would be grateful to be informed of that conclusion before any decision is issued.

As can be seen in the representations, the Parish Council asks the Council to refuse these applications. The Town and Country Planning (Consultation) (England) Direction 2026, made on 31 March 2026, sets out that where the local planning authority proposes to refuse an application which includes the provision of 150 or more houses or flats it must consult the Secretary of State before determining it. The Direction is procedural and is not a material consideration in deciding whether permission should be granted. A properly reasoned and properly evidenced refusal is precisely what the process contemplates being placed before the Secretary of State. The Parish Council is confident that the Council will proceed on that basis and records the point only because these applications are of a scale at which the procedural consequences of refusal might otherwise weigh where they should not.

Yours sincerely

Clerk to Stoke Poges Parish Council

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PLANNING APPLICATION PL/26/06177/OA

Outline planning application (with all matters reserved except for principal means of vehicular access to the highway) for the erection of up to 230 dwellings, including affordable housing, public open space and associated infrastructure.

Wexham Grange Land West Of Wexham Street Stoke Poges Buckinghamshire SL3 6N

How the Parish Council asks that this representation be taken into account

National decision-making policy (NDMP) DM3.1.c of the National Planning Policy Framework (NPPF) provides that, when considering development proposals, local planning authorities should **take account of planning matters raised** during any pre-application engagement, including any positive responses to that engagement, **as well as representations on the proposals (own emphasis)**.

The Parish Council has not confined itself to expressing a view. It has commissioned independent evidence and expertise. The Parish Council therefore asks that the officer report does more than record that a representation was received from Stoke Poges Parish Council. It asks that the report rehearses the matters raised in this representation, sets out the Council's position on each, and explains where and why it differs. That is what NDMP DM3.1.c requires, and it is the only basis on which members can be satisfied that the evidence before them has been weighed rather than listed.

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Summary of Representation

- **The Parish Council objects to the proposed development and requests that planning permission be refused.**
- The site is **not grey belt**. It comprises 15.69 hectares of wholly open golf course adjoining the built-up edge of Slough, which already reaches its south-western corner along Stoke Poges Lane, Church Lane and Farthing Green Lane. There is no defensible feature between the site and that edge. Development would bridge the remaining gap to Wexham Street, so that the village would cease to read as a settlement within the Green Belt and would be read as sprawl of the northern edge of the Slough urban area. That is an incongruous pattern of development within the meaning of Annex E of the NPPF, and the site therefore contributes strongly to Green Belt purpose (a).
- Even if the land were grey belt, the development would **fundamentally undermine the purposes of the remaining Green Belt taken together**, contrary to the second limb of NDMP GB7.1.g.i. That question has not been assessed by the applicant.
- The site is **not in a sustainable location** within NDMP TR3. The Department for Transport Connectivity Tool, which NDMP TR3.2 requires to be used, places this location in the **lowest 20%** nationally for walking. The applicant's own transport evidence assumes that approximately seven in ten trips will be made by private car.
- Either of those conclusions is sufficient. NDMP GB7.1.g is not satisfied, the development is **inappropriate development in the Green Belt**, and substantial weight attaches to the harm.
- The proposal would remove the Green Course at Wexham Park Golf Centre, the nine-hole course on which people start playing, and with Gallions Park 18 of the centre's 27 holes. The Green Course alone carries more than 25,000 rounds a year. **No surplus has been clearly shown and nothing is replaced**, contrary to NDMP HC7 and South Buckinghamshire Core Policies 5 and 6.
- The **transport evidence is incomplete**. The Transport Assessment omits background traffic growth, tests the year of opening rather than five or ten years after completion, does not use the Buckinghamshire Strategic Transport Model which the Council requested at pre-application stage, and does not assess eight of the eleven locations of established local concern. The Council is not in a position to conclude that the impacts are acceptable.
- The **benefits are overstated**. The 50 per cent affordable housing is the minimum NDMP GB8 requires on Green Belt land, not an overprovision, and the Housing Needs Assessment prepared for the Stoke Poges Neighbourhood Plan establishes that no affordable home ownership product is affordable to a household on the average income here, save shared ownership at a 10 per cent share. The tenure composition is not secured.
- The applicant advances **no very special circumstances case**, and the harm is not clearly outweighed.
- The Parish Council has separately asked that both applications be **determined by members at committee** and has set out its position on the Town and Country Planning (Consultation) (England) Direction 2026. That request is at Appendix 1.
- If the Council is nonetheless minded to approve, Section 3 sets out what the Parish Council asks to be secured, including on the location and accessibility of any new primary school.

1. Relevant Policies

1.1. The following adopted development plan policies are especially relevant for the Parish Council's representation:

- Core Policies 1, 3, 5, 6 and 7 of the South Bucks Core Strategy 2011 (SBCS)
- Policies GB1 and TR5 of the South Bucks Local Plan saved policies 1999 (SBLP)
- Policies SP4 and SP11 of the made Stoke Poges Neighbourhood Plan (SPNP)

1.2. The development plan is the starting point for decision-making unless material considerations indicate otherwise. The National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) are critical material considerations. The latest version of the NPPF includes a number of national decision-making policies (NDMP) which are especially relevant for the Parish Council's representation:

- DM1.1.b where it is noted that the applicant should be invited to submit a revised Planning Statement setting out how the proposal is consistent with relevant national decision-making policies;
- DM3.1.c which requires the local planning authority to take account of representations on the proposals;
- DM4 on the weight given to emerging proposals;
- S5 on the principle of development outside settlements and at S5.5 on the approach to development in the Green Belt;
- GB6, GB7 and GB8 on development in the Green Belt read with Annex B and Annex E;
- TR3, TR4 and TR6 on development and transport matters;
- HC7 on development affecting existing recreational land and facilities.

1.3. The latest version of the NPPF makes it clear in transitional arrangements that development plan policies (or parts of policies) which are materially inconsistent with national decision-making policies in the NPPF should be given very limited weight. The same provision states that other development plan policies should not be given reduced weight simply because they were adopted before the NPPF was published. In this respect, the Parish Council notes that:

- a. Core Policy 1 of the SBCS is materially inconsistent with the standard method approach and carries very limited weight;
- b. Core Policies 3 and 7 of the SBCS sit comfortably alongside complimentary NDMP on these matters and therefore continue to carry full weight;
- c. Core Policy 5 of the SBCS protects open space, sport and recreational facilities and permits their loss only in defined circumstances. Its protective purpose, and its requirements that a facility be of low value or quality and that there be clear evidence of no local quantitative or qualitative deficiency, are consistent with NDMP HC7 and carry full weight. It is accepted that the requirement that all five of its criteria be met, including that the site lie within a settlement excluded from the Green Belt, goes further than NDMP HC7, and that this part of the policy may be regarded as materially inconsistent with it. NDMP HC7 is therefore the primary test, with Core Policy 5 applied alongside it;

- d. Core Policy 6 of the SBCS protects existing physical, social and green infrastructure unless it is clear that it is no longer needed or alternative appropriate provision is made elsewhere. That is consistent with NDMP HC6 and HC7 and the policy carries full weight;
 - e. It is only the closed list of exceptions in Policy GB1 of the SBLP which pre-dates grey belt and other NPPF green belt exceptions. The policy's underlying control: that development in the Green Belt is inappropriate unless it falls within a recognised exception, and inappropriate development requires very special circumstances remain consistent with NDMP GB6 and carries full weight;
 - f. The provisions of Policy TR5 of the SBLP is consistent with the provisions of NDMP TR4 and TR6 and therefore carries full weight;
 - g. The provisions of SPNP Policies are also considered to be consistent with the provisions of NDMP's and therefore carry full weight.
- 1.4. The emerging Buckinghamshire Local Plan has recently completed its Regulation 19 consultation and is due to be submitted for examination before 31 December 2026. Applying NDMP DM4.1, and given the stage reached, its provisions carry very limited weight.

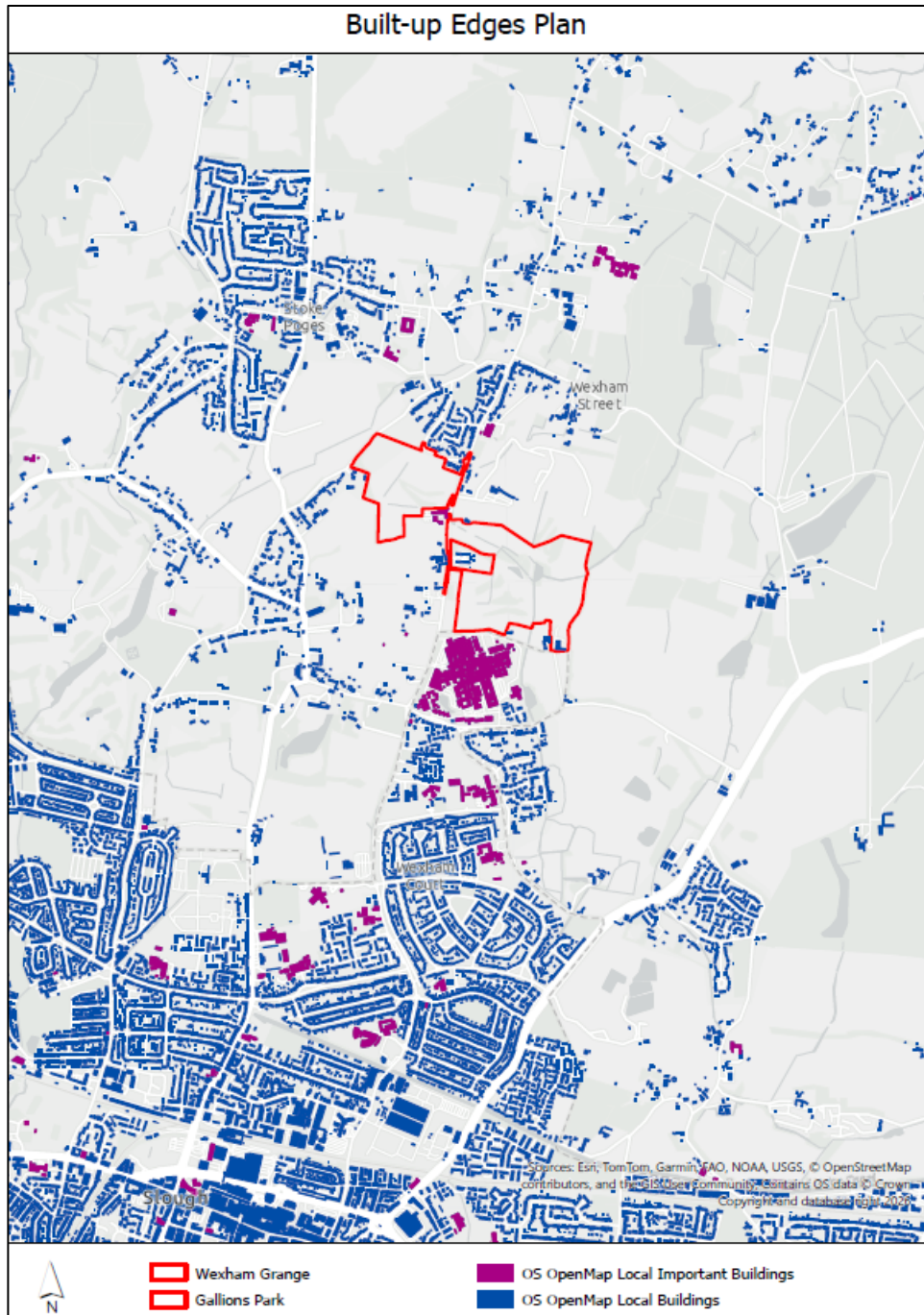
2. Key Issues

Grey Belt

- 2.1. Annex B of the NPPF defines grey belt as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b) or (d) in NPPF provision GB2. The word is "any". A strong contribution to one purpose takes the land outside the definition, whatever its contribution to the others.
- 2.2. Annex E of the NPPF, paragraphs 2 to 5, sets out the criteria for that judgement, in materially the same terms as Planning Practice Guidance Paragraph 005, Reference ID 64-005-20250225. For purpose (a) an area contributes strongly where it is likely to be free of existing development, lacks physical features in reasonable proximity that could restrict and contain development, and includes both of the following: being adjacent or near to a large built-up area, and, if developed, resulting in an incongruous pattern of development, such as an extended finger of development into the Green Belt.
- 2.3. Annex E paragraph 3 provides that villages are not to be considered large built-up areas. The only large built-up area in the vicinity of the site is Slough. Wexham Street and Stoke Poges are villages.
- 2.4. The site comprises 15.69 hectares of golf course. It contains no permanent structures and is wholly open. The site is near to the large built-up area of Slough. As to physical features capable of restricting and containing development, the site is bounded to the west by Farthing Green Lane, to the east by Wexham Street, to the north by residential frontage, and to the south by open agricultural land. A single carriageway unclassified rural lane is not a feature capable of restraining the outward growth of a built-up area of Slough's size. Lanes of this kind are routinely absorbed as internal streets when development passes them, which is what has already happened to the frontages along Stoke Poges Lane and

Church Lane. On the southern boundary, which is the boundary facing Slough, there is no feature of any kind. There is accordingly no defensible feature between this site and the built-up edge.

- 2.5. The Parish Council further notes that Annex E paragraph 1.a requires assessment areas to be identified at a scale small enough to enable variations in their contribution to the Green Belt purposes to be assessed, and to be subdivided where this is necessary to identify grey belt. A conclusion reached at the scale of a wider parcel does not establish the contribution of this site, which occupies a particular position at the head of the built-up edge.
- 2.6. As to whether development would produce an incongruous pattern, the built-up edge of Slough already extends northwards as frontage development along Stoke Poges Lane, Church Lane and Farthing Green Lane, reaching the south-western corner of the site. Development of the site would bridge from that frontage across the full depth of the intervening Green Belt to the southern edge of Wexham Street. The consequence is not an increment. It is that Wexham Street would cease to read as a village set in the Green Belt and would instead form the northern edge of the Slough urban area. That is an incongruous pattern of development within the meaning of Annex E.



2.7.

2.8. The Parish Council's position is therefore that the site makes a strong contribution to purpose (a).

2.9. The Parish Council anticipates the argument that the site is partially enclosed by existing development. There are two answers. First, the Annex E criterion is not simply partial enclosure; it is partial enclosure "such that new development would not result in an incongruous pattern of development". The qualifying words are part of the test. Second, the enclosure relied upon lies on the three sides facing away from Slough. Purpose (a) is concerned with checking the sprawl of a large built-up area. Enclosure on the sides facing

away from that built-up area does nothing to restrain growth from it. To treat the most recent outward extension of Slough as the reason the next is acceptable is circular, and it is the mechanism by which unrestricted sprawl proceeds.

- 2.10. The applicant's own Environmental Statement treats this and the accompanying Gallions Park application as a single project of up to 680 dwellings, on the basis that their impacts are interrelated. Assessed as the applicant assesses them, the conclusion is reinforced rather than altered. The project would place development on both sides of Wexham Street along its southern approach, joining the Slough frontage to the village from the west and extending the hospital projection towards it from the east, across 43.7 hectares in total. No assessment of contribution to purpose (a) that took the project as a whole could rationally conclude that the contribution was other than strong.
- 2.11. The Parish Council has also considered purposes (b) and (d). It assesses the contribution to purpose (b) as moderate, the site forming only a modest part of the gap between Slough and Gerrards Cross, and the contribution to purpose (d) as weak or none, no historic town being engaged. Neither is pressed. The definition at Annex B is not satisfied by reason of the contribution to purpose (a) alone.
- 2.12. The Parish Council notes that the definition applies the same condition to previously developed land and to other land, "in either case". Land does not become grey belt by containing structures. Fairways, greens, tees and the informal paths between them are not land lawfully developed and occupied by a permanent structure within the meaning of Annex B of the NPPF, and in any event any part of the site which were previously developed land would still have to satisfy the same test.
- 2.13. Even were the land to be treated as grey belt, NDMP GB7.1.g.i. imposes a separate and additional requirement that development would not fundamentally undermine the purposes, taken together, of the remaining Green Belt across the area of the plan. That question is not answered by the grey belt judgement. It is assessed at the scale of the plan area rather than the site, and Annex E paragraph 1.c requires it to be assessed against all five Green Belt purposes, not the three relevant to the definition.
- 2.14. The Parish Council's position is that the test is not met. The case for a moderate contribution to purpose (a) rests on partial enclosure by existing development, each element of which is itself a previous outward extension. If that reasoning is accepted here, it becomes available for every parcel behind the new edge, since each permission manufactures the enclosure which justifies the next. The remaining Green Belt in this part of Buckinghamshire is the narrow belt between the northern edge of Slough and the villages. It is not a broad tract with depth to spare. A method of reasoning which, once accepted, supplies a ready justification for developing successive parcels of that belt does fundamentally undermine its purposes taken together, whatever the merits of any individual parcel. The test is not one of quantum. It is whether what remains can still do the job.

Harm to the purposes of the Green Belt

- 2.15. The five purposes of the Green Belt are set out at GB2.1 of the NPPF. Although GB2 is a plan-making policy, the purposes are imported into decision-taking by the definition of grey belt at Annex B, which turns on purposes (a), (b) and (d); by NDMP GB7.1.g.i, which asks

whether development would fundamentally undermine the purposes taken together; and by Annex E, which requires assessment against the five purposes taken together. The proper question for the planning balance is therefore the effect of the development on the Green Belt and its purposes as a whole. It is not confined to the three purposes relevant to the grey belt definition, and it is not answered by a conclusion that land is or is not grey belt. The chapter opens by recording that the objective of Green Belt policy is to prevent urban sprawl by keeping land permanently open, and that the government attaches great importance to Green Belts, "the essential features of which are their openness and permanence". It is against that objective that the harm falls to be judged.

- 2.16. The development would build upon 15.69 hectares of land which is presently wholly open and free of permanent structures. Taken with the companion proposal at Gallions Park, which the applicant's own Environmental Statement treats as part of the same project, 43.7 hectares of open land would be lost.
- 2.17. Openness would be lost across the whole of the site. Openness is the essential feature of the Green Belt and its loss is harm in itself, irrespective of the contribution the land makes to any particular purpose.
- 2.18. The capacity of this land to check the outward growth of Slough would end. The built-up edge already reaches the south-western corner of the site along Stoke Poges Lane, Church Lane and Farthing Green Lane. Development would carry it across the remaining depth of open land to Wexham Street, so that the village ceases to read as a settlement within the Green Belt and becomes the northern edge of the urban area.
- 2.19. The countryside between Slough and the villages would be encroached upon, and the physical and visual separation between them correspondingly reduced. The Parish Council does not contend that Slough and Gerrards Cross would merge, and it does not advance purpose (b) as a strong contribution. It does contend that the separation which gives these villages their identity is a function the Green Belt performs here, and that the development would materially reduce it.
- 2.20. The permanence of what remained would be weakened. NDMP GB4.1.f requires Green Belt boundaries to be defined clearly, using physical features that are readily recognisable and likely to be defensible. The southern edge of this site, which would become the new edge of the Green Belt, runs across open agricultural fields with no feature upon the ground. A boundary of that kind invites the next application. The pressure to bring forward urban land within Slough for development would also be reduced, at the margin, by the release of greenfield land at its edge outside the plan process.
- 2.21. The site is not grey belt, and independently the development would fundamentally undermine the purposes of the remaining Green Belt taken together. NDMP GB7.1.g.i is therefore not satisfied on either of its two parts. The Parish Council also addresses criterion iii. below. No other category in NDMP GB7 is engaged. It follows that NDMP GB6 applies. The development is inappropriate development in the Green Belt, which is by definition harmful; substantial weight must be given to that harm including harm to openness; and permission should not be granted except in very special circumstances which clearly outweigh that harm and any other harm.

Sustainable location

- 2.22.NDMP GB7.1.g. of the NPPF provides that development is not inappropriate in the Green Belt where all four of its criteria are met. The third, at GB7.1.g.iii., is that the development would be in a sustainable location, "*with particular reference to policy TR3 of this Framework*". The Parish Council draws attention to the terms of that cross-reference. The equivalent provision in the December 2024 Framework, at paragraph 155(c), referred to paragraphs 110 and 115, which were concerned with the promotion of sustainable transport and with the assessment of residual impacts. The Planning Statement is written to that formulation. The current requirement refers instead to policy TR3, which is titled "*Locating development in sustainable locations*" and which is a test of the location itself rather than of the transport measures proposed for it.
- 2.23.NDMP TR3.1.a. provides that development proposals which could generate a significant amount of movement should be in locations that are sustainable, or which can be made so, and that this means the location should limit the need to travel, particularly by private car, and offer a genuine choice of transport modes for residents and users, unless the nature of the development would make this impractical.
- 2.24.NDMP TR3.1.c requires that any significant adverse impacts from the development on the transport network, in terms of capacity and congestion, or on highway safety, should be mitigated to an acceptable degree using a vision-led approach. That criterion is addressed in the section on transport impacts below. NDMP TR3.1.e provides that in rural areas opportunities to improve walking, wheeling, cycling and public transport and to enhance the connectivity of an area should be taken where they exist and can be supported by the development proposed. The Parish Council supports the taking of those opportunities and addresses them in the representation elsewhere.
- 2.25.NDMP TR3.2 provides that the Connectivity Tool (Connectivity Tool - GOV.UK) should be used alongside other relevant quantitative or qualitative evidence in assessing the connectivity of particular locations proposed for development. The Parish Council makes no criticism of the applicant for not having used the Connectivity Tool, since the Transport Assessment was prepared before the current NPPF was published. It observes only that policy TR3 falls to be applied at determination, and that the only Connectivity Tool evidence before the Council is that submitted by the Parish Council at Appendix 2.
- 2.26.The Parish Council has run the Department for Transport Connectivity Tool for the location. The results are set out in full at Appendix 2 and are summarised below.

	Score	National distribution
Overall, excluding driving	53	Low, 20-30%
Public transport	54	Low, 20-30%
Walking	47	Very low, 10-20%
Cycling	65	Below average, 30-40%
Driving	85	Slightly below average 40-50%

2.26. Broken down by destination, the position is more striking still. For leisure the overall score excluding driving is 40, and the walking score is 33, which places this location in the lowest decile nationally. For shopping the overall score is 45 and the walking score 42, both in the 10th to 20th percentile.

2.27. The clearest evidence is in the comparison of modes for the destinations residents must reach. For health, driving scores 88, in the 80th to 90th percentile nationally, while walking scores 46, in the 30th to 40th. For education, driving scores 84, in the 60th to 70th percentile, while walking scores 53, in the 40th to 50th.

2.28. The pattern is consistent and it is not marginal. Residents of this site would be able to drive to a hospital, a school or a shop with relative ease. They would not be able to walk to any of them other than with difficulty. That is the opposite of a location which limits the need to travel by private car and offers a genuine choice of modes.

2.29. The Transport Assessment proceeds on an assessed modal split of approximately 70 per cent private car. A proposal for up to 230 dwellings whose own transport evidence assumes that seven in ten trips will be made by car is not evidence of a sustainable location. It is evidence that the applicant does not expect the location to function as one.

2.30. On public transport, the Design and Access Statement relies upon two services, route WP1 between Slough town centre, Wexham Park Hospital and Stoke Green, and route 106 between Slough and Chalfont St Peter. The Parish Council's advisers record that the hourly frequency claimed is not borne out in practice, that the service is sporadic and unreliable, and that both routes run broadly north to south and therefore do not serve the range of destinations residents need to reach.

2.31. On walking and cycling, the claimed uptake is contradicted by the applicant's own modal split, and by the condition of footways and street lighting on the routes residents would in fact use.

2.32. On car clubs and mobility hubs, the proposal is an idealised model. A car club in a location of this character would need to be self-financing within a defined period and to secure an established operator. Neither is demonstrated.

- 2.33. The Parish Council has considered whether this is a location which, although not presently sustainable, can be made so within the meaning of NDMP TR3.1.a. It concludes that it cannot. The measures proposed are improvements to footways, crossings, lighting and the public rights of way network, together with a travel plan and the aspiration of a car club. Each is welcome and each would improve conditions at the margin. None alters the underlying facts, which are the distance to the services residents must reach, the absence of a bus network running in the directions they need to travel, and the applicant's own expectation that seven in ten trips will be made by car. A location does not become sustainable because a development improves the pavements leading away from it.
- 2.34. The adopted Core Strategy identifies Wexham Street among the Rural Settlements, a category defined as having a very limited range of shops and community facilities, in some cases none at all, and often poor access to public transport, particularly at weekends. That characterisation is not a policy judgement about where growth should go, and so is unaffected by the weight which Core Policy 1 attracts. It is a description of the facilities and services which exist at Wexham Street, the settlement this site adjoins, and it was confirmed as remaining accurate at paragraph 4.3 of the Wexham Neighbourhood Plan.
- 2.35. Core Policy 7 of the Core Strategy, which seeks to promote accessibility to services and facilities, is consistent with policy TR3 and carries full weight. The proposal conflicts with it.
- 2.36. Policy SP11 of the Stoke Poges Neighbourhood Plan identifies a Local Access Network intended to support healthy, safe and active travel within the parish, and the site frontage to Wexham Street adjoins a designated Key Location on the Policies Map. The policy carries full weight.
- 2.37. The site is not in a sustainable location within the meaning of NDMP TR3, and it cannot be made one by the measures proposed. The criterion at GB7.1.g.iii is therefore not met.
- 2.38. The four criteria in GB7.1.g are cumulative. The failure of this criterion is by itself sufficient to take the development outside the exception, irrespective of the Parish Council's separate case that the site does not constitute grey belt. It follows that the development is inappropriate development in the Green Belt under policy GB6, that substantial weight must be given to the harm to the Green Belt including harm to its openness, and that permission should not be granted except in very special circumstances which clearly outweigh that harm.
- 2.39. The separate question of the acceptability of the transport impacts of the development, under NDMP TR6.3 and TR6.4, is addressed below.

Loss of recreational land and facilities

- 2.40. The site is the whole of the Green Course at Wexham Park Golf Centre, 15.69 hectares. The Green Course is the nine-hole course of a 27-hole facility which also comprises the 18-hole Blue Course east of Wexham Street, a 32-bay driving range, a golf academy and

an adventure golf course. It was “designed to be accessible for those new to golf” (GNA paragraph 2.3) and is the course to which the centre’s academy membership is limited.¹

2.41. This application would remove the Green Course entirely. With the companion application at Gallions Park, which would reduce the Blue Course from 18 holes to nine, the centre would lose 18 of its 27 holes.

2.42. The facility is well used. The applicant’s Golf Needs Assessment (GNA, Nexus Planning, July 2026) records at paragraph 4.25 a membership of 756 and 59,824 rounds in the last twelve months, of which 25,314 were played on the Green Course. Some 26,099 rounds across the centre, 44 per cent of the total, were played by green fee players rather than members. England Golf has recognised the centre as one of England’s most successful junior golf environments.² The GNA itself describes the centre as “a public golf centre with wider accessibility” (paragraph 4.30), and accepts that private members’ clubs “may not provide an equivalent alternative” for its users (paragraph 4.31).

2.43. NDMP HC7.1 provides that development proposals should not result in the loss of existing open space, sports and recreational buildings and land unless one of four circumstances applies. NDMP HC7.1.c. on public infrastructure, and HC7.1.d on alternative sport and recreational provision do not apply. The applicant relies on provisions now set out in NDMP HC7.1.a and b.

2.44. NDMP HC7.1.a requires an assessment which has clearly shown the land to be surplus to requirements. The GNA concedes at paragraph 6.14 that “there is no recognised standard for golf provision against which oversupply or undersupply can be based”, and then concludes at paragraph 6.15 that the course is surplus. The route between the two is a comparison of golf holes per 1,000 population with county, regional and national averages. A ratio above the national average shows that an area is relatively well provided for. It does not show that a particular facility is not required.

2.45. The GNA’s demand analysis considers only the growth in golfers arising from population change to 2045 (paragraph 5.10). It does not address the demand that exists now: 25,314 rounds a year on this course alone. It does not ask where those rounds would be played and does not assess whether any other facility could absorb them. A course carrying more than 25,000 rounds a year is not surplus to requirements.

2.46. The GNA’s nine-hole supply overstates the alternatives. Its count of publicly accessible nine-hole provision, 63 holes (paragraphs 4.50 and 4.51), includes the three nine-hole loops at Stoke Park. They account for 27 of the 63 holes and, once the Green Course is removed, half of what remains. Stoke Park’s published visitor green fees for 2026 are £155 on weekdays and £175 on Fridays and at weekends.³ The GNA’s own table records Stoke

¹ wexhamparkgolfcentre.co.uk/membership (accessed 24 September 2026). Junior membership is £176.40 (under 12), £226.40 (12 to 14) and £276.40 (15 to 17). Academy membership is limited to the nine-hole Green Course.

² England Golf, “Wexham Park Golf Centre: England Golf Junior Hub Inspiring the Next Generation”, englandgolf.org/news-detail?newsarticleid=1486 (accessed 24 September 2026).

³ Golf Business News, “Stoke Park opens new clubhouse ahead of welcoming visitors back for new season”, 17 March 2026: visitor green fees for the 2026 spring and summer season of £155 Monday to Thursday and £175 Friday and weekends.

Park as having “changed model” and gives no price. Setting Stoke Park aside, the publicly accessible nine-hole alternatives are three single courses, at Iver, Datchet and Hedsor. The GNA’s wider supply also includes Uxbridge Golf Centre, which closed in January 2025 and remains closed,⁴ and does not deduct the reduction at South Buckinghamshire which it records at paragraph 4.13.⁵

2.47. The value and quality of this facility have been assessed by the Council. The Open Space, Sports and Recreational Facilities Strategy (2008), the evidence base named in Core Policy 5, scores the site 27 for value against a threshold of 15, and 43 for quality against a threshold of 39 (GNA paragraphs 3.16 and 3.17). The GNA’s alternative measure, online user ratings, is not an assessment, and the GNA accepts at paragraph 4.34 that “no assessments have taken place”.

2.48. NDMP HC7.1.b requires the loss to be replaced by equivalent or better provision, in a location which offers comparable or improved accessibility for the community it serves. Nothing is replaced. Reliance on facilities which already exist elsewhere is the surplus argument under another name. The public open space within the scheme is required to meet the needs of its own residents under NDMP GB8.1.c and Core Policy 5. It is not a sports facility and it replaces nothing. A nine-hole course formed from the reconfigured Blue Course, should the companion application proceed, would not replace the Green Course either: it would be the remnant of the 18-hole course, and the centre would still have lost half its holes.

2.49. The Green Course is where people start. It is the course designed for those new to the game and the course to which academy membership is confined. Its loss would remove the first step of the route from range to nine holes to 18 holes at a centre England Golf has recognised for its junior golf. The GNA does not mention junior golf. Its demand analysis instead relies on a projected fall of almost 16 per cent in the 10 to 19 age group to discount future demand (Table 5.11.1). That is an argument for protecting the facilities through which young people take up the game, not for removing them.

2.50. The Planning Statement claims compliance with Core Policy 5 (paragraph 6.148). It cannot comply. The policy requires all five of its criteria to be met. The site is not of low value or quality on the Council’s own evidence, there is no clear evidence of an absence of local deficiency, and the site is not within a settlement excluded from the Green Belt. Setting the last of those aside, the proposal still fails the first two, which are consistent with NDMP HC7. Core Policy 6 protects existing social and green Infrastructure unless it is clear that it is no longer needed or alternative appropriate provision is made elsewhere. Neither is shown.

2.51. Policy WEX12 of the Wexham Neighbourhood Plan does not apply to this site, which lies in Stoke Poges parish. The Neighbourhood Plan is nonetheless a material consideration. It identifies the golf centre as an important community facility whose “continued presence in the parish is supported”, and describes that facility as providing “both a 9- and 18-hole

⁴uxbridgегolfcentre.co.uk (accessed 24 September 2026): “Course currently closed”. The London Borough of Hillingdon closed the course on 14 January 2025 and in April 2025 approved a 65-year lease to a new operator.

⁵thesouthbuckinghamshire.co.uk (accessed 24 September 2026), which describes the course as “now 12 holes”.

course". The facility the neighbouring community has planned to retain includes the Green Course.

2.52. Sport England's response on the companion application (PL/26/06178/OA) states that the proposal falls outside its statutory remit and that it "has not provided a detailed response", and advises that full consideration be given to national and local policies protecting sport and recreation facilities and to the advice of the relevant national governing body. The Parish Council is not aware of a response on this application. The absence of an objection from Sport England is not evidence that the loss is acceptable. The Parish Council asks the Council to consult England Golf, the national governing body for the sport, before determining the application.

2.53. The proposal would result in the loss of recreational land and facilities contrary to NDMP HC7 and Core Policies 5 and 6 of the SBCS. None of the circumstances in which NDMP HC7 permits such a loss applies. On the Parish Council's primary case the development is inappropriate, and the loss is "other harm" to be weighed under NDMP GB6.2 alongside the harm to the Green Belt. Were the Council to find that the development is not inappropriate, NDMP S5.5 requires the balance to be struck applying paragraph 2 of NDMP S5. That paragraph provides that the benefits of approving development are likely to be substantially outweighed where a proposal would fail to comply with a national decision-making policy stating that development proposals should be refused in specific circumstances. NDMP HC7 is such a policy: development proposals "should not result in the loss" of recreational land and facilities unless one of its four circumstances applies, and none does. On either test, the Parish Council considers that the loss attracts significant weight as an adverse effect in its own right, and greater weight when the companion Gallions Park application is taken into account.

Transport impacts

2.54. NDMP TR6.1 of the NPPF requires development proposals likely to generate significant amounts of movement to be supported by a transport assessment proportionate to the nature and scale of the development, and by a travel plan indicating how sustainable transport objectives will be delivered, monitored and managed over time. NDMP TR6.3 provides that in assessing movement patterns and potential impacts, including whether they are considered to be severe, reasonable future scenarios should be considered, taking into account impacts at relevant times of the day, potential cumulative impacts, multimodal trip generation and the promotion of sustainable modes of travel, and realising the transport vision for the development itself. NDMP TR6.4 provides that development proposals should be refused if they would have a severe adverse impact on the transport network (in terms of capacity and congestion, including cumulative impacts), or an unacceptable impact on highway safety; taking into account any mitigation measures proposed as well as any wider network improvements, including measures to support sustainable patterns of movement. Policy TR3.1.c requires that any significant adverse impacts on the transport network, in terms of capacity and congestion, or on highway safety, should be mitigated to an acceptable degree using a vision-led approach.

2.55. Saved Policy TR5 of the SBLP requires that, in determining proposals involving new or altered access arrangements, works to the highway, or development generating additional traffic, regard is had to the effects on highway safety, congestion and the environment.

Core Policy 7 of the Core Strategy seeks to promote accessibility while supporting a safe and efficient transport network.

2.56. The Parish Council does not advance a wholesale criticism of the applicant's transport work and it is right to record what its advisers accept. The methodology of the transport assessments and the traffic model used can be considered adequate representations of the local highway network. The TRICS trip generation data is acceptable, as are the split of trips into modes of travel and by purpose. Personal Injury Accident records have been examined and no locations were found where highway conditions merited attention to reduce incidents. Stage 1 Safety Audits have been satisfactorily made and their recommendations considered for the site access and other highway proposals. The Parish Council's objection is therefore not that the assessment is wrong. It is that it is incomplete, in identifiable and material respects, and that on the evidence presented the Council is not in a position to conclude that the impacts are acceptable.

2.57. The Parish Council and its members have identified eleven locations in and around the parish which experience adverse traffic conditions in the peak periods. Of those eleven, three are assessed in the Transport Assessment, at Figures 9.1 and 9.4. Eight are not assessed at all. They are:

- the junction of Church Lane and Park Road;
- the junction of Church Lane and Greys Park Road;
- Greys Park Road towards the roundabout at Stoke Green and Stoke Road;
- Stoke Road turning right into Fir Tree Avenue;
- Church Lane turning right into Fir Tree Avenue;
- the junction of Bells Hill turning right into Hollybush Hill;
- the whole of Hollybush Hill at school drop off and pick up times; and
- Rogers Lane from West End Lane to Bells Hill at school times.

2.58. Several of these lie directly on the routes by which traffic from this site would travel westwards and northwards, by way of Farthing Green Lane and Church Lane. The Church Lane junctions in particular would carry development traffic from this site and are not assessed in the submission. Local knowledge is that Hollybush Hill can take forty minutes to traverse end to end at school times because of gridlocked traffic, and that Rogers Lane between West End Lane and Bells Hill is gridlocked at the same times.

2.59. NDMP TR6.3 requires impacts to be assessed "at relevant times of the day". The relevant times at these locations are the school drop off and pick up periods, which are not necessarily the network peak hours modelled. The Transport Assessment does not test them. The applicant has used 2031, the estimated year of opening, as the target year for junction capacity assessments. The usual requirement is to model five years after completion of the development, and for major developments of this nature a horizon of up to ten years after completion is commonly used. The assessment therefore tests the network at the moment the development arrives rather than at any point in the period over which its effects will be felt.

2.60. The assessment does not include National Road Traffic Forecast growth using Temprow. It assumes that only committed developments will add traffic to the network. It is standard practice to include background traffic growth in future year assessments in addition to

committed development traffic. The effect of the omission is to understate future flows, and therefore to understate the residual impact of the development.

- 2.61. At the pre-application meeting of 15 July 2026 the Council requested that traffic modelling should use the Buckinghamshire Strategic Transport Model, BSTM2. The Transport Assessment states, at paragraph 9.10.1, that no detailed information on the model, its scope, inputs or timescales was made available and that the model was not available for use prior to submission, and concludes at paragraph 9.10.2 that "there is no requirement to use the BSTM2 for this development". The Council's own website describes BSTM2 as having been developed "to inform planning applications and support transport assessments", states that developers can apply to use it, and sets out the application process. On the face of the Council's published material the model was available.
- 2.62. A gravity model has been used instead. The Parish Council's advisers consider that BSTM2 would better capture local highway routing, traffic behaviour and modelled congestion, and would more accurately represent the directional split and routing of traffic in this area.
- 2.63. Examination of the existing traffic flow data along Wexham Street shows that the observed directional splits during both the morning and evening peak periods do not reflect the directional distribution assumed for the modelling. That is a foundational input. If the distribution is wrong, the junction capacity results derived from it are unreliable.
- 2.64. The Transport Assessment gives accurate physical descriptions of the local highway network, its infrastructure and its junctions. It does not adequately describe existing traffic conditions, including queueing, on-street parking problems or link capacity. None of the junction capacity assessments reflects the queueing that residents observe, and none predicts any significant worsening of those conditions as a result of the development. An assessment which does not capture the baseline cannot demonstrate the increment.
- 2.65. The traffic flow data for future scenarios in the Transport Assessment does not clearly present the separate trip generations of the Wexham Grange and Gallions Park schemes so that they can be combined. It is also unclear whether the committed development of 317 dwellings and 350 square metres of commercial floorspace at Sefton Park is included in the junction capacity assessments. It is also unclear whether account has been taken of the pending application for up to 50 dwellings on land between Plough Lane and Farthing Green Lane, reference PL/25/6431/OA, which the applicant's own Planning Statement records at paragraph 2.2. NDMP TR6.3 requires reasonable future scenarios to be considered, which extends beyond commitments to development reasonably in prospect.
- 2.66. This matters particularly here. The applicant's own Environmental Statement treats this application as part of a single project of up to 680 dwellings, on the express basis that the impacts are interrelated. NDMP TR6.3 requires potential cumulative impacts to be taken into account. A reader of this Transport Assessment cannot presently identify what the combined effect of the project would be at any junction.
- 2.67. The Parish Council does not assert that it has demonstrated a severe adverse impact. It could not do so on the material available, and it does not seek to overstate its case. Its position is that the Council is not in a position to conclude that the impacts of this

development are acceptable. The assessment omits background traffic growth, tests a year which is not the appropriate horizon, does not use the strategic model the Council itself requested, proceeds on a directional distribution which does not match observed conditions, does not characterise existing queueing, does not present the cumulative effect of the project of which this application forms part, and does not assess eight of the eleven locations at which conditions are known to be worst, including at the times of day when they are worst. Nor can the adequacy of the mitigation proposed be judged. NDMP TR6.4 requires severity to be assessed taking into account any mitigation measures proposed and any wider network improvements. Mitigation can only be measured against a baseline, and the baseline in this assessment does not reflect the queueing, on-street parking and school-time conditions which residents experience.

2.68. NDMP TR6.4 requires refusal where a development would have a severe adverse impact on the transport network including cumulative impacts. Whether that threshold is crossed is a question this assessment does not answer. The Parish Council invites the Council to require it to be answered before any decision is taken, and submits that in the absence of that work permission should be refused. The Parish Council further notes that NDMP S5.2 provides that the circumstances in which the benefits of approving development are likely to be substantially outweighed by adverse effects include where a proposal would fail to comply with a national decision-making policy which states that development proposals should be refused in specific circumstances. NDMP TR6.4 is such a policy.

2.69. The Parish Council welcomes the junction, crossing, cycling and public right of way improvements offered so far as they go, and sets out below what it asks to be secured. It does not regard them as making this development acceptable.

3. Other matters for consideration

Conditions

- 3.1. The Parish Council's position is that planning permission should be refused, for the reasons set out above. The matters in this section are raised without prejudice to that position. They are raised because the Parish Council considers it would be a failure of its duty to its community to leave them unsaid.
- 3.2. Paragraph 3.22 of the Planning Statement proposes a cascade mechanism for primary school provision. The first limb is a financial contribution towards the expansion of an existing primary school within Buckinghamshire and/or Slough Borough. The second is a financial contribution towards the delivery of a new primary school within Buckinghamshire and/or Slough Borough. The provision of land for a new one form entry primary school on the Safeguarded Land is the third and last limb. Paragraph 3.24 records that "the need or otherwise for this Safeguarded Land would be determined through the planning application process".
- 3.3. On the face of that cascade, the entire educational response to a project of up to 680 dwellings could take the form of a payment towards expanding a school in Slough Borough. Every one of the resulting school journeys would be made from a location whose Connectivity Tool walking score for education is 53 and would in practice be made by car. That outcome would compound the transport effects addressed above rather than mitigate them.
- 3.4. The Parish Council therefore asks that the cascade be reordered and conditioned, so that a financial contribution under the first or second limb is available only where the local education authority confirms in writing, before the completion of any planning obligation, that sufficient additional places can be delivered at an existing or new school which the majority of children from the development could reach on foot, within a defined walking catchment to be agreed. In the absence of that confirmation, the land option should be triggered.
- 3.5. If a school is to be provided on the Safeguarded Land, the Parish Council asks that its position and access be settled so that it serves the existing community as well as the new one. The land shown on drawing LEU.01 lies at the southern extremity of the Wexham Grange site, which is the point within the wider project furthest from Wexham Street and closest to Slough. It adjoins the Sports Centre and Wexham Park Hall, and the Parish Council regards that co-location as the strongest feature of the position and one which should be made the most of. Specifically, the Parish Council asks that:
 - a. the school be laid out and accessed so that it can be reached on foot and by cycle directly from Wexham Street and from the existing public rights of way network, and not only through the internal streets of the new development;
 - b. safe walking and cycling routes to the school be provided and secured for existing residents of Wexham Street, Plough Lane, Farthing Green Lane and Stoke Green, with a controlled crossing of Wexham Street where required;

- c. the opportunity for shared access, parking and servicing with the Sports Centre and Wexham Park Hall be taken, so that the school forms part of a community cluster rather than a facility internal to a new estate;
- d. arrangements for drop off and pick up be designed so that they do not discharge onto Wexham Street in a manner which worsens the conditions identified in this representation; and
- e. the school be secured with a community use agreement, so that its hall, grounds and sports facilities are available to the existing community outside school hours.

3.6. The Parish Council is aware that a number of local schools have objected on the grounds of pressure on school places. The applicant has offered education contributions. If the Council were minded to grant permission, the Parish Council expects the applicant to be held to the full cost of the school places the development generates, whether through land, build or financial contributions. It also expects those obligations to be secured in a planning obligation, triggered before the pupils arrive, and not reduced on viability grounds. Local families should not bear the consequences of a shortfall the development creates.

3.7. The Parish Council also asks that, if the Council were minded to grant permission:

- a. the Buckinghamshire Strategic Transport Model be used, or failing that that the junction assessments be re-run to include at least National Road Traffic Forecast background growth and to model conditions five years after opening;
- b. the eight unassessed locations identified above be assessed, including at school drop off and pick up times;
- c. it be confirmed that all known and committed development, including Sefton Park and the pending application at land between Plough Lane and Farthing Green Lane, is included in the junction capacity assessments;
- d. travel plans be monitored for a minimum of five years from first occupation, with a target of at least a 10 per cent reduction in single occupancy private car trips, consistent with the approach taken elsewhere in Buckinghamshire; and
- e. the junction improvements, pedestrian crossing facilities, speed reduction measures and footway and street lighting improvements proposed, or identified by the Parish Council, be secured through a planning obligation with a timetable for implementation.

3.8. The Parish Council also asks that the improvements to walking, wheeling and cycling which NDMP TR3.1.e contemplates, be taken and secured, and in particular:

- a. improvements at the Key Location on the Wexham Street frontage identified on the Stoke Poges Neighbourhood Plan Policies Map under Policy SP11, together with improvements to the Local Access Network which that policy identifies;
- b. the off-road walking and cycling links and public right of way improvements which the development is capable of delivering;
- c. improvements to footway condition and street lighting on the routes residents would in fact use; and
- d. developer-funded real time bus information at the bus stops nearest the site.

3.9. The Parish Council also asks that the affordable housing be secured in full, and specifically that:

- a. the rented element be secured at not less than the proportion sought by Policy SP4 of the SPNP;
- b. the affordable home ownership element be delivered through products which the Housing Needs Assessment prepared for that Plan identifies as capable of achieving affordability in this area;
- c. the size mix be secured consistently with Policy SP4, which seeks a majority of one and two bedroom dwellings; and
- d. no viability review mechanism be included, the applicant having presented the 50 per cent as a benefit of the scheme.

3.10. Finally, the Parish Council asks that, were the Council minded to grant permission, a planning obligation to:

- a. prevent any part of the existing golf course being taken out of use for development until the reconfigured nine-hole course proposed under PL/26/06649/FA has been completed and opened for play;
- b. secure the retained golf facilities, comprising the remaining course, driving range and academy, for pay and play use by the public, with a junior membership category and a junior coaching programme, for a period to be agreed with the Council; and
- c. secure a financial contribution, calculated with the advice of England Golf, towards publicly accessible golf provision in the area to offset the holes lost.

4. Conclusion

The applicable test

- 4.1. The Parish Council's primary position is that the site is not grey belt, and that the development is not in a sustainable location within NDMP TR3. On either conclusion, NDMP GB7.1.g is not satisfied, no other category in NDMP GB7 applies, and the development is inappropriate development in the Green Belt.
- 4.2. The applicable test is therefore that at NDMP GB6.2. Permission should not be granted unless the harm to the Green Belt by reason of inappropriateness, together with any other harm, is clearly outweighed by other considerations, and substantial weight must be given to the Green Belt harm. The burden of demonstrating that lies on the applicant.
- 4.3. Only if the Council were to reject both of those submissions would the balance at NDMP S5.5 arise, under which permission should be granted unless the benefits would be substantially outweighed by adverse effects assessed against the national decision-making policies.
- 4.4. The Planning Statement contains no very special circumstances case. Paragraph 7.10 asserts in a single sentence that the test at paragraph 153 of the former Framework "is additionally passed", while stating that the applicant "does not consider this to be necessary/engaged". No harm is identified, weighed or set against any consideration. Should the Council conclude that the development is inappropriate, it will have no case before it to assess.

The benefits of the scheme

- 4.5. *The delivery of market housing.* The Parish Council accepts that this is a genuine benefit and that, in the context of a housing land supply of 0.97 years in the former South Bucks area, it attracts significant weight. It does not accept the description of the location as "highly sustainable", for the reasons above.
- 4.6. *Affordable housing.* Paragraph 7.6 describes the 50% offer as "significantly exceeding the requirements of adopted planning policy and guidance", by comparison with the 40 per cent in Core Policy 3. That comparison is with the wrong figure. Policy GB8.1.a.ii requires, on Green Belt sites, a contribution 15 percentage points above the highest existing requirement, capped at 50 per cent. Forty plus fifteen is fifty five; the cap brings it to fifty. The scheme offers the minimum the NPPF requires for a site of this kind, and no more.
- 4.7. Further, compliance with the Golden Rules is a condition of the exception at GB7.1.g.iv, not a consideration weighing in favour of permission. Were it otherwise, every Green Belt scheme complying with GB8 would thereby establish very special circumstances, which cannot be the intention of a policy whose premise is that inappropriate development is by definition harmful.
- 4.8. The Parish Council makes a more fundamental point about the weight this benefit can carry. A percentage of affordable housing is a measure of tenure, not of affordability. Paragraph 7.8 of the Planning Statement relies upon a "chronic housing affordability crisis in the area". The Housing Needs Assessment prepared for the Stoke Poges

Neighbourhood Plan by AECOM, which forms part of the Plan's evidence base, establishes that most of what the statutory definition calls affordable housing would not address that crisis here. No affordable home ownership product is affordable to a household on the average income in this area, with the single exception of shared ownership at a 10 per cent share. The only tenures that deliver affordability to households on lower quartile earnings are Affordable Rent and Social Rent, and then only to households with two such earners. It follows that the weight properly attaching to this benefit depends entirely on the tenure composition of the 50 per cent, and not on the 50 per cent itself. A scheme delivering its affordable housing predominantly as shared ownership at conventional shares would make no contribution to the affordability crisis on which the applicant relies.

- 4.9. On that question the Planning Statement commits to nothing. Paragraph 7.6 states that "tenure split and mix of affordable homes will be discussed and agreed with the Council". Policy SP4 of the Neighbourhood Plan sets a starting point of 50 per cent affordable homes for rent and 50 per cent affordable homes for sale. The Council is asked to attribute significant weight to a benefit whose composition is undetermined, in circumstances where its own development plan evidence shows that half of the indicative composition would not be affordable to local households.
- 4.10. The size mix is likewise unaddressed. Policy SP4 seeks a majority of one and two bedroom dwellings, and the Assessment identifies smaller units as a route to improving affordability. These are outline applications with all matters reserved except access. Nothing before the Council secures the mix, and nothing can, absent a condition or planning obligation.
- 4.11. Finally, NDMP GB8.3 permits a viability assessment demonstrating that it would not be possible to comply with the Golden Rules where a proposal is for a strategic site. The 50 per cent is therefore not immune from later reduction. The Parish Council's position is that the delivery of affordable housing is a real benefit and attracts weight, but that the weight is moderate rather than significant, and is contingent. It asks that, were the Council minded to grant permission, the affordable housing be secured in full, with the rented element secured at not less than the proportion sought by Policy SP4, with the ownership element delivered through products the Assessment identifies as capable of achieving affordability in this area, with a size mix consistent with Policy SP4, and without any viability review mechanism. Absent those securities, the weight properly attaching to this benefit is limited.
- 4.12. *Public open space and play facilities.* Provision of accessible green space is required by NDMP GB8.1.c. It is a condition of the exception relied upon, not a benefit. The Parish Council also observes that the land in question is open at present and is crossed by public rights of way. It is not a replacement for the golf course it would displace. It is open space for the residents of the development, not a sports facility, and cannot satisfy NDMP HC7.1.b or HC7.1.d.
- 4.13. *Biodiversity net gain of a minimum of 10 per cent.* This is the statutory minimum under the Environment Act 2021 and is mandatory. Delivery of a legal requirement attracts no weight as a planning benefit.

- 4.14. *Construction employment and expenditure by future residents.* Temporary, modest in scale, and common to development generally. The second limb duplicates the housing benefit already counted.
- 4.15. *Compliance with the Golden Rules.* Listed at paragraph 7.8 as a sixth, separate benefit. It is the label for the affordable housing and open space items already counted, and its inclusion double counts them.

The adverse effects

- 4.16. *Harm to the Green Belt.* Substantial, for the reasons set out above. It attracts substantial weight under NDMP GB6.2 and does not appear in the applicant's balance at all. Paragraph 7.7 of the Planning Statement states that, subject to mitigation, "no other harms have been identified". That is wrong. On the Parish Council's case the development is inappropriate, and harm by reason of inappropriateness attracts substantial weight. Independently of that, a conclusion that development is not inappropriate is not a conclusion that it causes no harm. Land which is open ceases to be open when it is built upon, and the NPPF directs that substantial weight be given to harm to the Green Belt including harm to its openness.
- 4.17. *Transport.* The applicant records no adverse transport effect. That conclusion rests on a Transport Assessment which omits background traffic growth, tests the year of opening rather than five or ten years after completion, does not use the strategic model the Council requested at the pre-application meeting of 15 July 2026, proceeds on a directional distribution inconsistent with observed flows on Wexham Street, does not characterise existing queueing, and assesses eight of the eleven locations of established local concern not at all, including at the school drop off and pick up times when conditions are worst. The Council cannot record zero harm on the strength of an assessment which does not test for it.
- 4.18. *Loss of recreational land and facilities.* The application would remove the nine-hole Green Course, the centre's entry-level course, and with the companion Gallions Park application 18 of the centre's 27 holes. The applicant treats the loss as having no material impact. For the reasons set out above, no surplus has been clearly shown and nothing is replaced, contrary to NDMP HC7 and Core Policies 5 and 6 of the SBCS. This attracts significant weight.
- 4.19. *Conflict with the development plan.* The proposal conflicts with saved Policy GB1 of the SBLP, the development falling within none of its exceptions and, for the reasons given above, within none of the exceptions at NDMP GB7. It conflicts with Core Policy 7 of the Core Strategy, which seeks to promote accessibility to services and facilities. Both policies carry full weight. It also conflicts with Core Policies 5 and 6 of the SBCS, which protect open space, sport and recreational facilities and existing social and green Infrastructure.
- 4.20. *Cumulative effects.* The applicant's Environmental Statement treats this application as part of a single project of up to 680 dwellings whose impacts are interrelated. Section 7 of the Planning Statement balances 230. No balance of the project as a whole has been presented to the Council. The only document before the Council which assesses the project as a whole is the Golf Needs Assessment, and it does so in order to conclude that removing 18 of the centre's 27 holes would have no material impact.

The balance

- 4.21. On the harm side of the balance stands the loss of 15.69 hectares of open land, and with the companion proposal at Gallions Park 43.7 hectares, in a part of the Metropolitan Green Belt where the built-up edge of Slough already reaches the south-western corner of this site. That harm attracts substantial weight. To it must be added the transport harm which the applicant's assessment does not test for, the loss of 18 holes of a well-used public golf centre without any surplus being shown or any replacement being made, the conflict with the development plan, and the absence of any assessment of the cumulative effects of the project of which this application forms part.
- 4.22. On the other side, the only benefit attracting significant weight is the delivery of market housing. The affordable housing attracts moderate weight, and moderate weight only if secured in the form which the development plan evidence shows to be effective. The remaining matters relied upon are requirements of the policy under which permission is sought, statutory obligations, or duplications.
- 4.23. Taken together, these considerations do not clearly outweigh the harm identified. Very special circumstances do not exist.
- 4.24. Were the Council to conclude that the development is not inappropriate, the Parish Council would submit in the alternative that, applying NDMP S5.5, the benefits are substantially outweighed by the adverse effects when assessed against the national decision-making policies in the NPPF.
- 4.25. The Parish Council requests that planning permission be refused.

Connectivity Tool Lite

Guidance

[Connectivity Tool \(/\)](#) > [Map \(/app\)](#) > Score breakdown

Explore the score

Please see [Interpreting Connectivity Scores \(/help/interpreting-connectivity-scores\)](#) for guidance

Square ID	498850_183450
Local authorities	Buckinghamshire
Latitude	51.541303
Longitude	-0.576023



Overall

Type	National score	National Distribution
Overall (except driving)	53	Low (20-30%)
Public transport	54	Low (20-30%)
Walking	47	Very low (10-20%)
Cycling	65	Below average (30-40%)
Driving	85	Slightly below average (40-50%)

Education

Type	National score	National Distribution
Overall (except driving)	58	Below average (30-40%)
Public transport	63	Below average (30-40%)
Walking	53	Slightly below average (40-50%)
Cycling	73	Slightly below average (40-50%)
Driving	84	Above average (60-70%)

Leisure

Type	National score	National Distribution
Overall (except driving)	40	Very low (10-20%)
Public transport	44	Very low (10-20%)
Walking	33	Very low (10-20%)
Cycling	54	Very low (10-20%)
Driving	77	Very low (10-20%)

Health

Type	National score	National Distribution
Overall (except driving)	53	Below average (30-40%)
Public transport	57	Below average (30-40%)
Walking	46	Below average (30-40%)
Cycling	65	Slightly below average (40-50%)
Driving	88	Very high (80-90%)

Shopping

Type	National score	National Distribution
Overall (except driving)	45	Very low (10-20%)
Public transport	47	Very low (10-20%)
Walking	42	Very low (10-20%)
Cycling	59	Very low (10-20%)
Driving	82	Very low (10-20%)

Residential

Type	National score	National Distribution
Overall (except driving)	60	Low (20-30%)
Public transport	58	Below average (30-40%)
Walking	59	Low (20-30%)
Cycling	72	Slightly below average (40-50%)
Driving	93	High (70-80%)

Workplaces

Type	National score	National Distribution
Overall (except driving)	56	Slightly below average (40-50%)
Public transport	58	Slightly below average (40-50%)
Walking	45	Below average (30-40%)
Cycling	65	Slightly above average (50-60%)
Driving	86	Very high (80-90%)

Stoke Poges Parish Council

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PLANNING APPLICATION PL/26/06178/OA

Outline planning application (with all matters reserved except for principal means of vehicular access to the highway) for the demolition of existing buildings and erection of up to 450 dwellings, including affordable housing, public open space and associated infrastructure.

Gallions Park Land East Of Wexham Street Stoke Poges Buckinghamshire SL3 6ND

How the Parish Council asks that this representation be taken into account

National decision-making policy (NDMP) DM3.1.c of the National Planning Policy Framework (NPPF) provides that, when considering development proposals, local planning authorities should **take account of planning matters raised** during any pre-application engagement, including any positive responses to that engagement, **as well as representations on the proposals (own emphasis)**.

The Parish Council has not confined itself to expressing a view. It has commissioned independent evidence and expertise. The Parish Council therefore asks that the officer report does more than record that a representation was received from Stoke Poges Parish Council. It asks that the report rehearses the matters raised in this representation, sets out the Council's position on each, and explains where and why it differs. That is what NDMP DM3.1.c requires, and it is the only basis on which members can be satisfied that the evidence before them has been weighed rather than listed.

Contents:

Summary of Representation

1. Relevant policies
2. Key issues
3. Other matters for consideration
4. Conclusion

Appendix 1 – Request to Buckinghamshire Council on the national scheme of delegation

Appendix 2 – Connectivity Tool output
Summary of Representation

- **The Parish Council objects to the proposed development and requests that planning permission be refused.**
- The site is **not grey belt**. It comprises 28 hectares of open golf course. Development already projects northwards from Slough along Wexham Road as far as Wexham Park Hospital, and this proposal would carry that projection substantially further north to within a short distance of Wexham Street. Annex E gives as its illustration of an incongruous pattern "an extended 'finger' of development into the Green Belt". This is that, and the site therefore contributes strongly to Green Belt purpose (a). The applicant relies on partial enclosure by the hospital campus, which is itself the outermost point of the projection, and by the retained golf course, which is open land.
- Even if the land were grey belt, the development would **fundamentally undermine the purposes of the remaining Green Belt taken together**, contrary to the second limb of NDMP GB7.1.g.i. That question has not been assessed by the applicant.
- The site is **not in a sustainable location** within NDMP TR3. The Department for Transport Connectivity Tool, which NDMP TR3.2 requires to be used, places this location in the **lowest 20%** nationally for walking. The applicant's own transport evidence assumes that approximately seven in ten trips will be made by private car, and the Parish Council's advisers consider it unlikely that a bus operator would divert into the site at all.
- Either of those conclusions is sufficient. NDMP GB7.1.g is not satisfied, the development is **inappropriate development in the Green Belt**, and substantial weight attaches to the harm.
- The proposal **conflicts with Policy WEX1** of the Wexham Neighbourhood Plan, made on 25 June 2026, which permits development outside the defined Rural Settlements only where it falls within an NPPF exception, demonstrates very special circumstances, or is a strategic allocation, and which requires all proposals to restrict coalescence with Slough, individually or cumulatively. The Planning Statement does not mention Policy WEX1 at any point.
- The proposal would reduce the Blue Course at Wexham Park Golf Centre from 18 holes to nine and, with Wexham Grange companion application, remove 18 of the centre's 27 holes. The applicant's own figures record 756 members and nearly 60,000 rounds a year. **No surplus has been clearly shown and nothing is replaced**, contrary to NDMP HC7, South Buckinghamshire Core Policies 5 and 6 and Neighbourhood Plan Policy WEX12, which identifies the centre as an important community facility.
- The **transport evidence is incomplete** and the Council is not in a position to conclude that the impacts are acceptable.
- The **benefits are overstated**. The 50 per cent affordable housing is the minimum NDMP GB8 requires on Green Belt land, and the Housing Needs Assessment prepared for the Wexham Neighbourhood Plan establishes that no affordable home ownership product is affordable to a household on the lower quartile earnings in this area, whether one earner or two. The tenure composition is not secured.
- The applicant advances **no very special circumstances case**, and the harm is not clearly outweighed.
- The Parish Council has separately asked that both applications be **determined by members at committee** and has set out its position on the Town and Country Planning (Consultation) (England) Direction 2026. That request is at Appendix 1.

- If the Council is nonetheless minded to approve, Section 3 sets out what the Parish Council asks to be secured, including on the location and accessibility of any new primary school.

Relevant Policies

1. The following adopted development plan policies are especially relevant for the Parish Council's representation:
 - Core Policies 1, 3, 5, 6 and 7 of the South Bucks Core Strategy 2011 (SBCS)
 - Policies GB1 and TR5 of the South Bucks Local Plan saved policies 1999 (SBLP)
 - Policies WEX1, WEX2, WEX10 and WEX12 of the made Wexham Neighbourhood Plan (WNP)

2. The development plan is the starting point for decision-making unless material considerations indicate otherwise. The National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) are critical material considerations. The latest version of the NPPF includes a number of national decision-making policies (NDMP) which are especially relevant for the Parish Council's representation:
 - DM1.1.b where it is noted that the applicant should be invited to submit a revised Planning Statement setting out how the proposal is consistent with relevant national decision-making policies;
 - DM3.1.c which requires the local planning authority to take account of representations on the proposals;
 - DM4 on the weight given to emerging proposals;
 - S5 on the principle of development outside settlements and at S5.5 on the approach to development in the Green Belt;
 - GB6, GB7 and GB8 on development in the Green Belt read with Annex B and Annex E;
 - TR3, TR4 and TR6 on development and transport matters;
 - HC7 on development affecting existing recreational land and facilities.

3. The latest version of the NPPF makes it clear in transitional arrangements that development plan policies (or parts of policies) which are materially inconsistent with national decision-making policies in the NPPF should be given very limited weight. The same provision states that other development plan policies should not be given reduced weight simply because they were adopted before the NPPF was published. In this respect, the Parish Council notes that:
 - a. Core Policy 1 of the SBCS is materially inconsistent with the standard method approach and carries very limited weight;
 - b. Core Policies 3 and 7 of the SBCS sit comfortably alongside complimentary NDMP on these matters and therefore continue to carry full weight;
 - c. Core Policy 5 of the SBCS protects open space, sport and recreational facilities and permits their loss only in defined circumstances. Its protective purpose, and its requirements that a facility be of low value or quality and that there be clear evidence of no local quantitative or qualitative deficiency, are consistent with NDMP HC7 and carry full weight. It is accepted that the requirement that all five of its criteria be met, including that the site lie within a settlement excluded from the

- Green Belt, goes further than NDMP HC7, and that this part of the policy may be regarded as materially inconsistent with it. NDMP HC7 is therefore the primary test, with Core Policy 5 applied alongside it;
- d. Core Policy 6 of the SBCS protects existing physical, social and green infrastructure unless it is clear that it is no longer needed or alternative appropriate provision is made elsewhere. That is consistent with NDMP HC6 and HC7 and the policy carries full weight;
 - e. It is only the closed list of exceptions in Policy GB1 of the SBLP which pre-dates grey belt and other NPPF green belt exceptions. The policy's underlying control: that development in the Green Belt is inappropriate unless it falls within a recognised exception, and inappropriate development requires very special circumstances remain consistent with NDMP GB6 and carries full weight;
 - f. The provisions of Policy TR5 of the SBLP is consistent with the provisions of NDMP TR4 and TR6 and therefore carries full weight;
 - g. The provisions of WNP Policies are also considered to be consistent with the provisions of NDMP's and therefore carries full weight.
4. The emerging Buckinghamshire Local Plan has recently completed its Regulation 19 consultation and is due to be submitted for examination before 31 December 2026. Applying NDMP DM4.1, and given the stage reached, its provisions carry very limited weight.

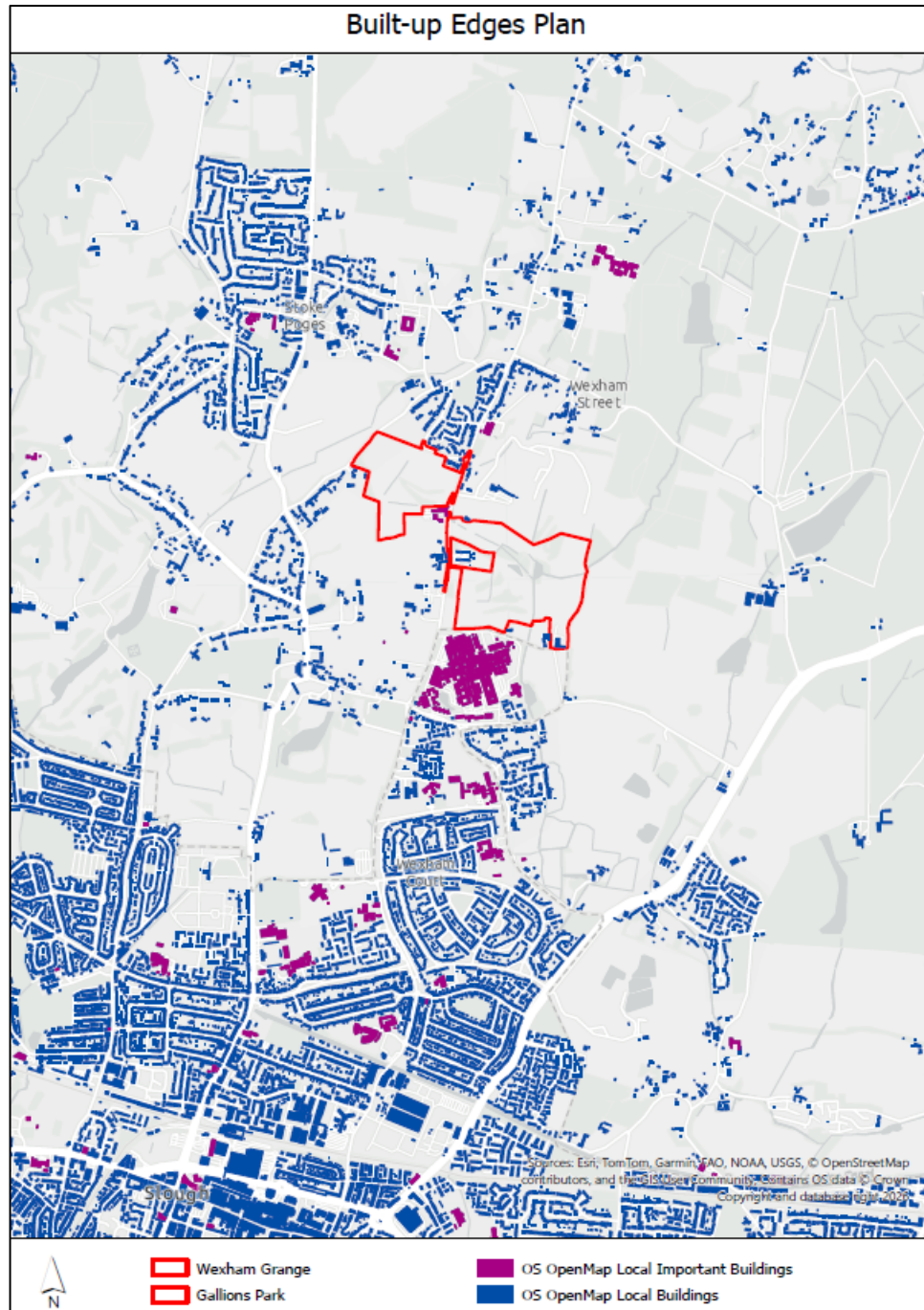
2. Key Issues

Grey Belt

- 2.1. Annex B of the NPPF defines grey belt as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b) or (d) in NPPF provision GB2. The word is "any". A strong contribution to one purpose takes the land outside the definition, whatever its contribution to the others.
- 2.2. Annex E of the NPPF, paragraphs 2 to 5, sets out the criteria for that judgement, in materially the same terms as Planning Practice Guidance Paragraph 005, Reference ID 64-005-20250225. For purpose (a) an area contributes strongly where it is likely to be free of existing development, lacks physical features in reasonable proximity that could restrict and contain development, and includes both of the following: being adjacent or near to a large built-up area, and, if developed, resulting in an incongruous pattern of development, such as an extended finger of development into the Green Belt.
- 2.3. Annex E paragraph 3 provides that villages are not to be considered large built-up areas. The only large built-up area in the vicinity of the site is Slough. Wexham Street and Stoke Poges are villages.
- 2.4. The site comprises 28 hectares of golf course. The only structures are a greenkeeping building and vehicle storage in the south-eastern corner, which the proposals would demolish. More than 27 hectares are wholly open. The site is near to the large built-up area of Slough. Development extends continuously northwards from Slough along Wexham Road as far as Wexham Park Hospital, which adjoins the southern part of the site. As to

containing features, there is none to the north or west. The northern boundary is open golf course land in the same ownership as the application site, lying in the Green Belt and unprotected by any designation. Open land in the applicant's own control, whose retention depends on present intentions and on a separate planning application, has none of the permanence required of a Green Belt edge and is not a physical feature capable of restricting and containing development. The western boundary is Wexham Street. A single carriageway rural lane is not a feature capable of restraining the outward growth of a built-up area of Slough's size, and lanes of this kind are routinely absorbed as internal streets when development passes them. The southern boundary is the hospital campus, which is development rather than a containing feature, and which is itself the outermost point of the projection from Slough. Gallions Wood to the east lies across the direction in which growth would travel and constrains eastward, not northward, expansion.

- 2.5. As to an incongruous pattern, development already projects northwards from Slough along Wexham Road into the Green Belt as far as the hospital. Development of this site would carry that projection substantially further north, across 28 hectares, to within a short distance of Wexham Street. Annex E gives as its illustration of an incongruous pattern "an extended 'finger' of development into the Green Belt". This is that, in the most literal form the policy contemplates.



2.6. The Parish Council's position is therefore that the site makes a strong contribution to purpose (a). That the openness of this land is of recognised local significance is corroborated by Policy WEX8 of the Wexham Neighbourhood Plan, made on 25 June 2026, which protects five locally significant views, three of which, V2, V3 and V4, are taken on or across the golf course. The Parish Council does not advance the views as the test for purpose (a), which is a different question, nor as a conflict with Policy WEX8. It advances them as evidence that the open character of this land is neither incidental nor unvalued.

- 2.7. The Parish Council anticipates the argument that the site is partially enclosed by existing development. There are two answers. First, the Annex E criterion is not simply partial enclosure; it is partial enclosure "such that new development would not result in an incongruous pattern of development". The qualifying words are part of the test. Second, the enclosure relied upon consists of the hospital campus to the south, which is itself the outermost point of the projection from Slough, and the retained golf course to the north, which is open land. Purpose (a) is concerned with checking the sprawl of a large built-up area. To treat the most recent outward extension of Slough as the reason the next is acceptable is circular, and it is the mechanism by which unrestricted sprawl proceeds.
- 2.8. The applicant's own Environmental Statement treats these applications as a single project of up to 680 dwellings, on the basis that their impacts are interrelated. Assessed as the applicant assesses them, the conclusion is reinforced rather than altered. The project would place development on both sides of Wexham Street along its southern approach, joining the Slough frontage to the village from the west and extending the hospital projection towards it from the east, across 43.7 hectares in total. No assessment of contribution to purpose (a) that took the project as a whole could rationally conclude that the contribution was other than strong.
- 2.9. The Parish Council has also considered purposes (b) and (d). It assesses the contribution to purpose (b) as moderate, the site forming only a modest part of the gap between Slough and Gerrards Cross, and the contribution to purpose (d) as weak or none, no historic town being engaged. Neither is pressed. The definition at Annex B is not satisfied by reason of the contribution to purpose (a) alone.
- 2.10. The Parish Council notes that the definition applies the same condition to previously developed land and to other land, "in either case". Land does not become grey belt by containing structures. Fairways, greens, trees and the informal paths between them are not land lawfully developed and occupied by a permanent structure within the meaning of Annex B, and in any event any part of the site which were previously developed land would still have to satisfy the same test.
- 2.11. Even were the land to be treated as grey belt, NDMP GB7.1.g.i. imposes a separate and additional requirement that development would not fundamentally undermine the purposes, taken together, of the remaining Green Belt across the area of the plan. That question is not answered by the grey belt judgement. It is assessed at the scale of the plan area rather than the site, and Annex E paragraph 1.c requires it to be assessed against all five Green Belt purposes, not the three relevant to the definition.
- 2.12. The Parish Council's position is that the test is not met. The case for a moderate contribution to purpose (a) rests on partial enclosure by existing development, each element of which is itself a previous outward extension. If that reasoning is accepted here it becomes available for every parcel behind the new edge, since each permission manufactures the enclosure which justifies the next. The remaining Green Belt in this part of Buckinghamshire is the narrow belt between the northern edge of Slough and the villages. It is not a broad tract with depth to spare. A method of reasoning which, once accepted, supplies a ready justification for developing successive parcels of that belt does fundamentally undermine its purposes taken together, whatever the merits of any individual parcel. The test is not one of quantum. It is whether what remains can still do the job.

Harm to the purposes of the Green Belt

- 2.13. The five purposes of the Green Belt are set out at GB2.1 of the NPPF. Although GB2 is a plan-making policy, the purposes are imported into decision-taking by the definition of grey belt at Annex B, which turns on purposes (a), (b) and (d); by NDMP GB7.1.g.i, which asks whether development would fundamentally undermine the purposes taken together; and by Annex E, which requires assessment against the five purposes taken together. The proper question for the planning balance is therefore the effect of the development on the Green Belt and its purposes as a whole. It is not confined to the three purposes relevant to the grey belt definition, and it is not answered by a conclusion that land is or is not grey belt. The chapter opens by recording that the objective of Green Belt policy is to prevent urban sprawl by keeping land permanently open, and that the government attaches great importance to Green Belts, "the essential features of which are their openness and permanence". It is against that objective that the harm falls to be judged.
- 2.14. The development would build upon 28 hectares of land which is presently open, the only structures being a greenkeeping building and vehicle storage in the south-eastern corner which the proposals would demolish. Taken with the companion proposal at Wexham Grange, which the applicant's own Environmental Statement treats as part of the same project, 43.7 hectares of open land would be lost.
- 2.15. Openness would be lost across the whole of the site. Openness is the essential feature of the Green Belt and its loss is harm in itself, irrespective of the contribution the land makes to any particular purpose.
- 2.16. The capacity of this land to check the outward growth of Slough would end. Development already projects northwards from Slough along Wexham Road into the Green Belt as far as Wexham Park Hospital. This proposal would carry that projection substantially further north, across 28 hectares, to within a short distance of Wexham Street, producing precisely the extended finger of development into the Green Belt which Annex E gives as its illustration of an incongruous pattern.
- 2.17. The countryside between Slough and the villages would be encroached upon, and the physical and visual separation between them correspondingly reduced. The Parish Council does not contend that Slough and Gerrards Cross would merge, and it does not advance purpose (b) as a strong contribution. It does contend that the separation which gives these villages their identity is a function the Green Belt performs here, and that the development would materially reduce it.
- 2.18. The permanence of what remained would be weakened. NDMP GB4.1.f requires Green Belt boundaries to be defined clearly, using physical features that are readily recognisable and likely to be defensible. The northern edge of this site, which would become the new edge of the Green Belt, would be formed by the retained golf course: open land in the same ownership as the application site, lying in the Green Belt, protected by no designation, and dependent upon the applicant's present intentions and a separate planning application. A boundary of that kind has none of the permanence the policy requires. The pressure to bring forward urban land within Slough for development would

also be reduced, at the margin, by the release of greenfield land at its edge outside the plan process.

- 2.19. The site is not grey belt, and independently the development would fundamentally undermine the purposes of the remaining Green Belt taken together. NDMP GB7.1.g.i is therefore not satisfied on either of its two parts. The Parish Council also addresses criterion iii. below. No other category in NDMP GB7 is engaged. It follows that NDMP GB6 applies. The development is inappropriate development in the Green Belt, which is by definition harmful; substantial weight must be given to that harm including harm to openness; and permission should not be granted except in very special circumstances which clearly outweigh that harm and any other harm.

Sustainable location

- 2.20. NDMP GB7.1.g. of the NPPF provides that development is not inappropriate in the Green Belt where all four of its criteria are met. The third, at GB7.1.g.iii., is that the development would be in a sustainable location, "*with particular reference to policy TR3 of this Framework*". The Parish Council draws attention to the terms of that cross-reference. The equivalent provision in the December 2024 Framework, at paragraph 155(c), referred to paragraphs 110 and 115, which were concerned with the promotion of sustainable transport and with the assessment of residual impacts. The Planning Statement is written to that formulation. The current requirement refers instead to policy TR3, which is titled "*Locating development in sustainable locations*" and which is a test of the location itself rather than of the transport measures proposed for it.
- 2.21. NDMP TR3.1.a. provides that development proposals which could generate a significant amount of movement should be in locations that are sustainable, or which can be made so, and that this means the location should limit the need to travel, particularly by private car, and offer a genuine choice of transport modes for residents and users, unless the nature of the development would make this impractical.
- 2.22. NDMP TR3.1.c requires that any significant adverse impacts from the development on the transport network, in terms of capacity and congestion, or on highway safety, should be mitigated to an acceptable degree using a vision-led approach. That criterion is addressed in the section on transport impacts below. NDMP TR3.1.e provides that in rural areas opportunities to improve walking, wheeling, cycling and public transport and to enhance the connectivity of an area should be taken where they exist and can be supported by the development proposed. The Parish Council supports the taking of those opportunities and addresses them in the representation elsewhere.
- 2.23. NDMP TR3.2 provides that the Connectivity Tool (Connectivity Tool - GOV.UK) should be used alongside other relevant quantitative or qualitative evidence in assessing the connectivity of particular locations proposed for development. The Parish Council makes no criticism of the applicant for not having used the Connectivity Tool, since the Transport Assessment was prepared before the current NPPF was published. It observes only that policy TR3 falls to be applied at determination, and that the only Connectivity Tool evidence before the Council is that submitted by the Parish Council at Appendix 2.

2.24. The Parish Council has run the Department for Transport Connectivity Tool for the location. The results are set out in full at Appendix 2 and are summarised below.

	Score	National distribution
Overall, excluding driving	53	Low, 20-30%
Public transport	58	Low, 20-30%
Walking	43	Very low, 10-20%
Cycling	66	Below average, 30-40%
Driving	86	Slightly below average 40-50%

2.25. Broken down by destination, the position is more striking still. For leisure the overall score excluding driving is 40, and the walking score is 30, which places this location in the lowest decile nationally. For shopping the overall score is 48 and the walking score 41, both in the 10th to 20th percentile.

2.26. The clearest evidence is in the comparison of modes for the destinations residents must reach. For health, driving scores 89, in the 80th to 90th percentile nationally, while walking scores 43, in the 20th to 30th. For education, driving scores 87, again in the 80th to 90th percentile, while walking scores 41, in the 20th to 30th.

2.27. The pattern is consistent and it is not marginal. Residents of this site would be able to drive to a hospital, a school or a shop with relative ease. They would not be able to walk to any of them other than with difficulty. That is the opposite of a location which limits the need to travel by private car and offers a genuine choice of modes.

2.28. The Transport Assessment proceeds on an assessed modal split of approximately 70 per cent private car. A proposal for up to 450 dwellings whose own transport evidence assumes that seven in ten trips will be made by car is not evidence of a sustainable location. It is evidence that the applicant does not expect the location to function as one.

2.29. On public transport, the Design and Access Statement relies upon two services, route WP1 between Slough town centre, Wexham Park Hospital and Stoke Green, and route 106 between Slough and Chalfont St Peter. The Parish Council's advisers record that the hourly frequency claimed is not borne out in practice, that the service is sporadic and unreliable, and that both routes run broadly north to south and therefore do not serve the range of destinations residents need to reach.

2.30. On walking and cycling, the claimed uptake is contradicted by the applicant's own modal split, and by the condition of footways and street lighting on the routes residents would in fact use.

- 2.31. On car clubs and mobility hubs, the proposal is an idealised model. A car club in a location of this character would need to be self-financing within a defined period and to secure an established operator. Neither is demonstrated.
- 2.32. Three matters make the position at this site weaker still. It is the larger scheme, at up to 450 dwellings, generating the greater number of movements. It lies further from the limited cluster of facilities at Wexham Street, the applicant's own Design and Access Statement putting Wexham Park Hospital at an 11 to 15 minute walk and Slough railway station at approximately two miles. And the Parish Council's advisers consider it unlikely that a bus operator would be willing to divert far into the site, or at all, to serve the modest passenger numbers forecast, the lost service time not being justified by the additional patronage. The consequence is that the bus provision on which the applicant's case rests would in practice remain on Wexham Street at the site boundary, and the walking distances from the majority of 450 dwellings to the nearest stop would be materially greater than the assessment assumes.
- 2.33. The Parish Council has considered whether this is a location which, although not presently sustainable, can be made so within the meaning of NDMP TR3.1.a. It concludes that it cannot. The measures proposed are improvements to footways, crossings, lighting and the public rights of way network, together with a travel plan and the aspiration of a car club. Each is welcome and each would improve conditions at the margin. None alters the underlying facts, which are the distance to the services residents must reach, the absence of a bus network running in the directions they need to travel, and the applicant's own expectation that seven in ten trips will be made by car. A location does not become sustainable because a development improves the pavements leading away from it.
- 2.34. Policy WEX1 of the Wexham Neighbourhood Plan supports the continued washing over of the parish by the Green Belt and supports limited infill only within the defined Rural Settlements of George Green, Wexham and that part of Wexham Street within the neighbourhood area. The site lies outside those settlements.
- 2.35. The justification to that policy, at paragraph 4.3, records that these settlements are defined as having a very limited range of shops and community facilities, in some cases none at all, and that "they often have poor access to public transport, particularly at weekends". It states that "this description continues to reflect the nature of facility provision in the parish".
- 2.36. That is a locally examined statement, made three months ago and forming part of the development plan, which characterises the accessibility of this location in terms indistinguishable from the Connectivity Tool output. It is precisely the "other relevant quantitative or qualitative evidence" which NDMP TR3.2 requires to be considered alongside the Tool.
- 2.37. Core Policy 7 of the Core Strategy, which seeks to promote accessibility to services and facilities, is consistent with NDMP TR3 and carries full weight. The proposal conflicts with it.
- 2.38. Policy WEX10 of the Wexham Neighbourhood Plan requires new development to contribute to a safe, accessible and well connected transport network by maximising

accessibility for pedestrians, cyclists and people with impaired mobility. The policy carries full weight.

2.39. The site is not in a sustainable location within the meaning of NDMP TR3, and it cannot be made one by the measures proposed. The criterion at GB7.1.g.iii is therefore not met.

2.40. The four criteria in GB7.1.g are cumulative. The failure of this criterion is by itself sufficient to take the development outside the exception, irrespective of the Parish Council's separate case that the site does not constitute grey belt. It follows that the development is inappropriate development in the Green Belt under policy GB6, that substantial weight must be given to the harm to the Green Belt including harm to its openness, and that permission should not be granted except in very special circumstances which clearly outweigh that harm.

2.41. The separate question of the acceptability of the transport impacts of the development, under NDMP TR6.3 and TR6.4, is addressed below.

Loss of recreational land and facilities

2.42. The site is 28ha of the Blue Course at Wexham Park Gold Centre. The Blue Course is the 18-hole course of a 27-hole facilities which also comprises the nine-hole Green Course of Wexham Street, 32-bay driving range, a golf academy and an adventure golf course. This application would reduce the Blue Course from 18 holes to nine. With the companion application at Wexham Grange, which would remove the Green Course entirely, the centre would lose 18 of its 27 holes and its only 18-hole course.

2.43. The facility is well used. The applicant's Golf Needs Assessment (GNA, Nexus Planning, July 2026) records at paragraph 4.25 a membership of 756 and 59,824 rounds in the last twelve months, of which 34,510 were played on the Blue Course. Some 26,099 rounds, 44% of the total, were played by green fee players rather than members. The Blue Course hosts club competitions and county and PGA professional events (GNA paragraph 2.2). England Golf has recognised the centre as one of England's most successful junior golf environments¹. A new layout of the Blue Course opening in April 2025 (GNA paragraph 2.2). This is not a facility in decline.

2.44. The GNA itself describes the centre as "a public golf centre with wider accessibility" (paragraph 4.30) and accepts that private members' clubs "may not provide an equivalent alternative for existing or potential Wexham Park Gold Centre users" (paragraph 4.31). The centre charges no joining fee, offers good value junior membership, and pay and play on both courses. The GNA identifies only one other 27-hole facility in its study area, Stoke Park (paragraph 4.12). Stoke Park is more expensive and the site has to be vacated by 3pm.

2.45. NDMP HC7.1 provides that development proposals should not result in the loss of existing open space, sports and recreational buildings and land unless one of four circumstances applies. NDMP HC7.1.c. on public infrastructure, and HC7.1.d on

¹ England Golf, "Wexham Park Golf Centre: England Golf Junior Hub Inspiring the Next Generation", <https://www.englandgolf.org/news-detail?newsarticleid=1486> (accessed 24 September 2026)

alternative sport and recreational provision do not apply. The applicant relies on provisions now set out in NDMP HC7.1.a and b.

2.46. NDMP HC7.1.a requires an assessment which has clearly shown the land be surplus to requirements. The GNA concedes at paragraph 6.14 that “there is no recognised standard for golf provision against which oversupply or undersupply can be based”. It then concludes at paragraph 6.15 that the course is surplus. The route between the two is a comparison of golf holes per 1,000 population in the study area with county, regional and national averages. A ratio above the national average shows that an area is relatively well provided for. It does not show that a particular facility is not required, and the author accepts there is no standard against which it could.

2.47. The GNA’s demand analysis considers only the growth in golfers arising from population change to 2045, some 723 people (paragraph 5.10), and then discounts that. It does not address the demand that exists now. On the applicant’s own figures the demand is 59,824 rounds a year. The GNA does not ask where those rounds would be played if 18 of the 27 holes were removed and does not assess whether any other facility has the capacity to absorb them. A facility carrying almost 60,000 rounds a year is not surplus to requirements. It is meeting them.

2.48. The supply side of the GNA overstates the alternatives:

- a. Its count of publicly accessible nine-hole provision, 63 holes (paragraphs 4.50 and 4.51), includes the three nine-hole loops at Stoke Park. They account for 27 of the 63 holes and, once the Green Course is removed, half of what remains. Stoke Park’s published visitor green fees for 2026 are £155 on weekdays and £175 on Fridays and at weekends.² The GNA’s own table records Stoke Park as having “changed model” and gives no price. A course at those prices is not comparable provision for the users of a pay and play centre.
- b. Its study area supply includes Uxbridge Golf Centre, 12 holes. That course closed in January 2025 and, according to its operator’s website, remains closed with no reopening date.³
- c. It records at paragraph 4.13 that the 18-hole South Buckinghamshire course, the county’s only council-run 18-hole course, is to be reduced, but no scenario deducts that reduction. The course now describes itself as 12 holes.⁴ The GNA does not say whether it is counted in the 18-hole figures.
- d. On the GNA’s own sensitivity test, which excludes private members’ clubs, publicly accessible 18-hole provision would fall to 0.18 holes per 1,000 population in 2045 with the Blue Course removed. That is level with the England figure and well below the Buckinghamshire figure of 0.31 (Table 5.21.1). If South Buckinghamshire is within that

² Golf Business News, “Stoke Park opens new clubhouse ahead of welcoming visitors back for new season”, 17 March 2026: visitor green fees for the 2026 spring and summer season of £155 Monday to Thursday and £175 Friday and weekends.

³ uxbridgegolfcentre.co.uk (accessed 24 September 2026): “Course currently closed”. The London Borough of Hillingdon closed the course on 14 January 2025 and in April 2025 approved a 65-year lease to a new operator.

⁴ thesouthbuckinghamshire.co.uk (accessed 24 September 2026), which describes the course as “now 12 holes”.

figure, taking it out would reduce provision to about 0.14, below the national average. On the applicant's own method, the study area would move from above-average to below-average provision of the kind of golf the Blue Course provides.

2.49. The value and quality of this facility have been assessed by the Council. The Open Space, Sports and Recreational Facilities Strategy (2008), the evidence base named in Core Policy 5, classifies the site as a district sports facility and scores it 27 for value against a threshold of 15, and 43 for quality against a threshold of 39 (GNA paragraphs 3.16 and 3.17). The GNA's alternative measure of quality, online user ratings (paragraphs 4.35 and 4.36), is not an assessment, and the GNA accepts at paragraph 4.34 that "no assessments have taken place".

2.50. The GNA also relies on the Draft Stage D Playing Pitch Strategy 2018 to 2036, which found the supply of golf courses sufficient (paragraph 3.56). That draft predates the closure at Uxbridge and the reduction at South Buckinghamshire. The priorities it identified for golf were adventure golf, which this centre provides, and increased participation among women and girls, which depends on accessible entry-level facilities of the kind this centre offers.

2.51. NDMP HC7.1.b requires the loss to be "replaced by equivalent or better provision in terms of quantity and quality, in a location which offers comparable or improved accessibility for the community it serves". Nothing is replaced. Reliance on facilities which already exist elsewhere is not replacement. It is the surplus argument under another name. The public open space within the scheme is required to meet the needs of its own residents under NDMP GB8.1.c and Core Policy 5. It is not a sports facility and it replaces nothing.

2.52. Nor is the provision relied upon of comparable accessibility for the community the centre serves. That community is defined not by a 20-minute drive time but by the way the centre is used: pay and play without a joining fee, an 18-hole course open to visitors, entry-level golf, and a route from range to nine holes to 18 holes on one site. The two alternatives the GNA identifies as nearest (paragraph 6.13) are Stoke Park, at the prices above and operating times within school hours, and Iver, a single nine-hole course. Neither offers an 18-hole course at pay and play prices.

2.53. The loss would fall hardest on junior golf. After this application the centre would have two nine-hole courses and no 18-hole course, and after both applications a single nine-hole course. A junior who learns on the range and a nine-hole course would have no 18-hole course to progress to on site. The GNA does not mention junior golf. Its demand analysis instead relies on a projected fall of almost 16 per cent in the 10 to 19 age group to discount future demand (Table 5.11.1). That is an argument for protecting the facilities through which young people take up the game, not for removing them.

2.54. The Planning Statement claims compliance with Core Policy 5 (paragraph 6.159). It cannot comply. The policy requires all five of its criteria to be met. The site is not of low value or quality on the Council's own evidence, there is no clear evidence of an absence of local deficiency, and the site is not within a settlement excluded from the Green Belt. Setting the last of those aside, the proposal still fails the first two, which are consistent with NDMP HC7. Core Policy 6 protects existing social and green infrastructure unless it is clear that it is no longer needed or alternative appropriate provision is made elsewhere. Neither is shown.

- 2.55. Policy WEX12.B protects the local community facilities shown on Figure 18 of the Neighbourhood Plan. The golf centre is shown on Figure 18 as a sports facility, and the table supporting the policy records that the centre provides “both a 9- and 18-hole course”, is “well-used by parts of the local community”, and that “Its continued presence in the parish is supported”. The Planning Statement accepts at paragraph 5.22 that the Golf Centre “is identified as one of these facilities which it seeks to retain”.
- 2.56. Policy WEX12.B permits the loss of such a facility only where it is demonstrated that (i) suitable and/or comparable alternative provision is available within the locality, and (ii) for commercial uses, that it is not viable to operate the existing facilities and that the facility has been marketed for at least 18 months, with consideration given to alternative commercial uses. On the first limb, the applicant treats the 20-minute drive time catchment as the “locality” (Planning Statement paragraph 6.159). That catchment extends into Slough, Windsor and Maidenhead and Hillingdon. The Parish Council does not accept that a neighbourhood plan policy protecting the facilities of one parish uses “locality” to mean an area spanning four local authorities. On the second limb, nothing is offered. The golf centre is a commercial facility. No viability evidence has been presented and no marketing has taken place, and the GNA describes the centre as aiming to operate as “a successful business” in which investment has been made (paragraph 2.9). Paragraph 6.157 of the Planning Statement presents the two commercial requirements as alternatives. The policy does not, and in any event, neither is addressed.
- 2.57. Sport England has not assessed the proposal. Its response of 13 August 2026 states that the proposal falls outside its statutory remit and that it “has not provided a detailed response”. It advises that full consideration be given to whether the proposal meets national policy and local plan policies protecting sport and recreation facilities, and that the Council may wish to consider advice from the relevant national governing body. The absence of an objection from Sport England is therefore not evidence that the loss is acceptable. The Parish Council asks the Council to consult England Golf, the national governing body for the sport, before determining the application.
- 2.58. The proposal would result in the loss of recreational land and facilities contrary to NDMP HC7, Core Policies 5 and 6 of the SBCS and Policy WEX12 of the WNP. None of the circumstances in which NDMP HC7 permits such a loss applies. On the Parish Council’s primary case the development is inappropriate, and the loss is “other harm” to be weighed under NDMP GB6.2 alongside the harm to the Green Belt. Were the Council to find that the development is not inappropriate, NDMP S5.5 requires the balance to be struck applying paragraph 2 of NDMP S5. That paragraph provides that the benefits of approving development are likely to be substantially outweighed where a proposal would fail to comply with a national decision-making policy stating that development proposals should be refused in specific circumstances. NDMP HC7 is such a policy: development proposals “should not result in the loss” of recreational land and facilities unless one of its four circumstances applies, and none does. On either test, the Parish Council considers that the loss attracts significant weight as an adverse effect in its own right, and greater weight when the companion application is taken into account.

Transport impacts

2.59. NDMP TR6.1 of the NPPF requires development proposals likely to generate significant amounts of movement to be supported by a transport assessment proportionate to the nature and scale of the development, and by a travel plan indicating how sustainable transport objectives will be delivered, monitored and managed over time. NDMP TR6.3 provides that in assessing movement patterns and potential impacts, including whether they are considered to be severe, reasonable future scenarios should be considered, taking into account impacts at relevant times of the day, potential cumulative impacts, multimodal trip generation and the promotion of sustainable modes of travel, and realising the transport vision for the development itself. NDMP TR6.4 provides that development proposals should be refused if they would have a severe adverse impact on the transport network (in terms of capacity and congestion, including cumulative impacts), or an unacceptable impact on highway safety; taking into account any mitigation measures proposed as well as any wider network improvements, including measures to support sustainable patterns of movement. Policy TR3.1.c requires that any significant adverse impacts on the transport network, in terms of capacity and congestion, or on highway safety, should be mitigated to an acceptable degree using a vision-led approach.

2.60. Saved Policy TR5 of the SBLP requires that, in determining proposals involving new or altered access arrangements, works to the highway, or development generating additional traffic, regard is had to the effects on highway safety, congestion and the environment. Core Policy 7 of the Core Strategy seeks to promote accessibility while supporting a safe and efficient transport network.

2.61. The Parish Council does not advance a wholesale criticism of the applicant's transport work and it is right to record what its advisers accept. The methodology of the transport assessments and the traffic model used can be considered adequate representations of the local highway network. The TRICS trip generation data is acceptable, as are the split of trips into modes of travel and by purpose. Personal Injury Accident records have been examined and no locations were found where highway conditions merited attention to reduce incidents. Stage 1 Safety Audits have been satisfactorily made and their recommendations considered for the site access and other highway proposals. The Parish Council's objection is therefore not that the assessment is wrong. It is that it is incomplete, in identifiable and material respects, and that on the evidence presented the Council is not in a position to conclude that the impacts are acceptable.

2.62. The Parish Council and its members have identified eleven locations in and around the parish which experience adverse traffic conditions in the peak periods. Of those eleven, three are assessed in the Transport Assessment, at Figures 9.1 and 9.4. Eight are not assessed at all. They are:

- the junction of Church Lane and Park Road;
- the junction of Church Lane and Greys Park Road;
- Greys Park Road towards the roundabout at Stoke Green and Stoke Road;
- Stoke Road turning right into Fir Tree Avenue;
- Church Lane turning right into Fir Tree Avenue;
- the junction of Bells Hill turning right into Hollybush Hill;
- the whole of Hollybush Hill at school drop off and pick up times; and
- Rogers Lane from West End Lane to Bells Hill at school times.

- 2.63. Traffic from this site would enter Wexham Street and travel predominantly south towards Slough, past Wexham Park Hospital and the hospital roundabout, and northwards towards Stoke Poges and the A412. Several of the unassessed locations lie on the onward routes through Stoke Poges parish taken by traffic from this site. Of particular relevance to this application is the observation that Wexham Street past the hospital is usually occupied by parked vehicles on the kerbside, with the result that the approach is gridlocked up to the roundabout. That location falls within the area assessed at Figure 9.1, but the assessment does not reflect the on-street parking or the queueing which in practice determine its operation. Local knowledge is also that Hollybush Hill can take forty minutes to traverse end to end at school times because of gridlocked traffic.
- 2.64. NDMP TR6.3 requires impacts to be assessed "at relevant times of the day". The relevant times at these locations are the school drop off and pick up periods, which are not necessarily the network peak hours modelled. The Transport Assessment does not test them. The applicant has used 2031, the estimated year of opening, as the target year for junction capacity assessments. The usual requirement is to model five years after completion of the development, and for major developments of this nature a horizon of up to ten years after completion is commonly used. The assessment therefore tests the network at the moment the development arrives rather than at any point in the period over which its effects will be felt.
- 2.65. The assessment does not include National Road Traffic Forecast growth using Temprow. It assumes that only committed developments will add traffic to the network. It is standard practice to include background traffic growth in future year assessments in addition to committed development traffic. The effect of the omission is to understate future flows, and therefore to understate the residual impact of the development.
- 2.66. At the pre-application meeting of 15 July 2026 the Council requested that traffic modelling should use the Buckinghamshire Strategic Transport Model, BSTM2. The Transport Assessment states, at paragraph 9.10.1, that no detailed information on the model, its scope, inputs or timescales was made available and that the model was not available for use prior to submission, and concludes at paragraph 9.10.2 that "there is no requirement to use the BSTM2 for this development". The Council's own website describes BSTM2 as having been developed "to inform planning applications and support transport assessments", states that developers can apply to use it, and sets out the application process. On the face of the Council's published material the model was available.
- 2.67. A gravity model has been used instead. The Parish Council's advisers consider that BSTM2 would better capture local highway routing, traffic behaviour and modelled congestion, and would more accurately represent the directional split and routing of traffic in this area.
- 2.68. Examination of the existing traffic flow data along Wexham Street shows that the observed directional splits during both the morning and evening peak periods do not reflect the directional distribution assumed for the modelling. That is a foundational input. If the distribution is wrong, the junction capacity results derived from it are unreliable.
- 2.69. The Transport Assessment gives accurate physical descriptions of the local highway network, its infrastructure and its junctions. It does not adequately describe existing traffic

conditions, including queueing, on-street parking problems or link capacity. None of the junction capacity assessments reflects the queueing that residents observe, and none predicts any significant worsening of those conditions as a result of the development. An assessment which does not capture the baseline cannot demonstrate the increment.

2.70. The traffic flow data for future scenarios in the Transport Assessment does not clearly present the separate trip generations of the Wexham Grange and Gallions Park schemes so that they can be combined. It is also unclear whether the committed development of 317 dwellings and 350 square metres of commercial floorspace at Sefton Park is included in the junction capacity assessments. It is also unclear whether account has been taken of the pending application for up to 50 dwellings on land between Plough Lane and Farthing Green Lane, reference PL/25/6431/OA, which the applicant's own Planning Statement records at paragraph 2.2. NDMP TR6.3 requires reasonable future scenarios to be considered, which extends beyond commitments to development reasonably in prospect.

2.71. This matters particularly here. The applicant's own Environmental Statement treats this application as part of a single project of up to 680 dwellings, on the express basis that the impacts are interrelated. NDMP TR6.3 requires potential cumulative impacts to be taken into account. A reader of this Transport Assessment cannot presently identify what the combined effect of the project would be at any junction.

2.72. The Parish Council does not assert that it has demonstrated a severe adverse impact. It could not do so on the material available, and it does not seek to overstate its case. Its position is that the Council is not in a position to conclude that the impacts of this development are acceptable. The assessment omits background traffic growth, tests a year which is not the appropriate horizon, does not use the strategic model the Council itself requested, proceeds on a directional distribution which does not match observed conditions, does not characterise existing queueing, does not present the cumulative effect of the project of which this application forms part, and does not assess eight of the eleven locations at which conditions are known to be worst, including at the times of day when they are worst. Nor can the adequacy of the mitigation proposed be judged. NDMP TR6.4 requires severity to be assessed taking into account any mitigation measures proposed and any wider network improvements. Mitigation can only be measured against a baseline, and the baseline in this assessment does not reflect the queueing, on-street parking and school-time conditions which residents experience.

2.73. NDMP TR6.4 requires refusal where a development would have a severe adverse impact on the transport network including cumulative impacts. Whether that threshold is crossed is a question this assessment does not answer. The Parish Council invites the Council to require it to be answered before any decision is taken, and submits that in the absence of that work permission should be refused. The Parish Council further notes that NDMP S5.2 provides that the circumstances in which the benefits of approving development are likely to be substantially outweighed by adverse effects include where a proposal would fail to comply with a national decision-making policy which states that development proposals should be refused in specific circumstances. NDMP TR6.4 is such a policy.

2.74. The Parish Council welcomes the junction, crossing, cycling and public right of way improvements offered so far as they go, and sets out below what it asks to be secured. It does not regard them as making this development acceptable.

3. Other matters for consideration

Conditions

- 3.1. The Parish Council's position is that planning permission should be refused, for the reasons set out above. The matters in this section are raised without prejudice to that position. They are raised because the Parish Council considers it would be a failure of its duty to its community to leave them unsaid.
- 3.2. Paragraph 3.22 of the Planning Statement proposes a cascade mechanism for primary school provision. The first limb is a financial contribution towards the expansion of an existing primary school within Buckinghamshire and/or Slough Borough. The second is a financial contribution towards the delivery of a new primary school within Buckinghamshire and/or Slough Borough. The provision of land for a new one form entry primary school on the Safeguarded Land is the third and last limb. Paragraph 3.24 records that "the need or otherwise for this Safeguarded Land would be determined through the planning application process". The Parish Council draws attention to the fact that the Safeguarded Land shown at Appendix 3 to this Planning Statement is not within the application site. The drawing, LEU.01, is titled "Wexham Grange", carries that application's job number, and shows a parcel lying west of Wexham Street within the red line of application PL/26/06177/OA. The primary school provision for this development therefore depends upon a separate application, over which this applicant offers the Council no certainty. If this application were permitted and PL/26/06177/OA were not, the land option would not exist.
- 3.3. On the face of that cascade, the entire educational response to a project of up to 680 dwellings could take the form of a payment towards expanding a school in Slough Borough. Every one of the resulting school journeys would be made from a location whose Connectivity Tool walking score for education is 41 and would in practice be made by car. That outcome would compound the transport effects addressed above rather than mitigate them.
- 3.4. The Parish Council therefore asks that the cascade be reordered and conditioned, so that a financial contribution under the first or second limb is available only where the local education authority confirms in writing, before the completion of any planning obligation, that sufficient additional places can be delivered at an existing or new school which the majority of children from the development could reach on foot, within a defined walking catchment to be agreed. In the absence of that confirmation, the land option should be triggered.
- 3.5. If a school is to be provided on the Safeguarded Land, the Parish Council asks that its position and access be settled so that it serves the existing community as well as the new one. The land lies west of Wexham Street, at the southern extremity of the Wexham Grange site, so that children from this development would cross Wexham Street to reach it. It adjoins the Sports Centre and Wexham Park Hall, and the Parish Council regards that co-location as the strongest feature of the position and one which should be made the most of. Specifically, the Parish Council asks that:

- a. the school be laid out and accessed so that it can be reached on foot and by cycle directly from Wexham Street and from the existing public rights of way network, and not only through the internal streets of the new development;
- b. safe walking and cycling routes to the school be provided and secured for existing residents of Wexham Street, Plough Lane, Farthing Green Lane and Stoke Green, with a controlled crossing of Wexham Street where required;
- c. the opportunity for shared access, parking and servicing with the Sports Centre and Wexham Park Hall be taken, so that the school forms part of a community cluster rather than a facility internal to a new estate;
- d. arrangements for drop off and pick up be designed so that they do not discharge onto Wexham Street in a manner which worsens the conditions identified in this representation; and
- e. the school be secured with a community use agreement, so that its hall, grounds and sports facilities are available to the existing community outside school hours.

3.6. The Parish Council is aware that a number of local schools have objected on the grounds of pressure on school places. The applicant has offered education contributions. If the Council were minded to grant permission, the Parish Council expects the applicant to be held to the full cost of the school places the development generates, whether through land, build or financial contributions. It also expects those obligations to be secured in a planning obligation, triggered before the pupils arrive, and not reduced on viability grounds. Local families should not bear the consequences of a shortfall the development creates.

3.7. The Parish Council also asks that, if the Council were minded to grant permission:

- a. the Buckinghamshire Strategic Transport Model be used, or failing that that the junction assessments be re-run to include at least National Road Traffic Forecast background growth and to model conditions five years after opening;
- b. the eight unassessed locations identified above be assessed, including at school drop off and pick up times;
- c. it be confirmed that all known and committed development, including Sefton Park and the pending application at land between Plough Lane and Farthing Green Lane, is included in the junction capacity assessments;
- d. travel plans be monitored for a minimum of five years from first occupation, with a target of at least a 10 per cent reduction in single occupancy private car trips, consistent with the approach taken elsewhere in Buckinghamshire; and
- e. the junction improvements, pedestrian crossing facilities, speed reduction measures and footway and street lighting improvements proposed, or identified by the Parish Council, be secured through a planning obligation with a timetable for implementation.

3.8. The Parish Council also asks that the improvements to walking, wheeling and cycling which NDMP TR3.1.e contemplates be taken and secured, and in particular:

- a. the off-road walking and cycling links and public right of way improvements which the development is capable of delivering;
- b. improvements to footway condition and street lighting on the routes residents would in fact use; and
- c. developer-funded real time bus information at the bus stops nearest the site.

3.9.The Parish Council also asks that the affordable housing be secured in full, and specifically that:

- a. the rented element be secured at not less than the proportion sought by Policy WEX2 of the WNP;
- b. the affordable home ownership element be delivered through products which the Housing Needs Assessment prepared for that Plan identifies as capable of achieving affordability in this area;
- c. the size mix be secured consistently with Policy WEX2, which seeks a majority of one and two bedroom dwellings; and
- d. no viability review mechanism be included, the applicant having presented the 50 per cent as a benefit of the scheme.

3.10.Finally, the Parish Council asks that, were the Council minded to grant permission, a planning obligation:

- a. prevent any part of the existing course being taken out of use for development until the reconfigured nine-hole course proposed under PL/26/06649/FA has been completed and opened for play;
- b. secure the retained golf facilities, comprising the remaining course, driving range and academy, for pay and play use by the public, with a junior membership category and a junior coaching programme, for a period to be agreed with the Council; and
- c. secure a financial contribution, calculated with the advice of England Golf, towards publicly accessible golf provision in the area to offset the holes lost

4. Conclusion

The applicable test

- 4.1. The Parish Council's primary position is that the site is not grey belt, and that the development is not in a sustainable location within NDMP TR3. On either conclusion, NDMP GB7.1.g is not satisfied, no other category in NDMP GB7 applies, and the development is inappropriate development in the Green Belt.
- 4.2. The applicable test is therefore that at NDMP GB6.2. Permission should not be granted unless the harm to the Green Belt by reason of inappropriateness, together with any other harm, is clearly outweighed by other considerations, and substantial weight must be given to the Green Belt harm. The burden of demonstrating that lies on the applicant.
- 4.3. Only if the Council were to reject both of those submissions would the balance at NDMP S5.5 arise, under which permission should be granted unless the benefits would be substantially outweighed by adverse effects assessed against the national decision-making policies.
- 4.4. The Planning Statement contains no very special circumstances case. Paragraph 7.10 asserts in a single sentence that the test at paragraph 153 of the former Framework "is additionally passed", while stating that the applicant "does not consider this to be necessary/engaged". No harm is identified, weighed or set against any consideration. Should the Council conclude that the development is inappropriate, it will have no case before it to assess.

The benefits of the scheme

- 4.5. *The delivery of market housing.* The Parish Council accepts that this is a genuine benefit and that, in the context of a housing land supply of 0.97 years in the former South Bucks area, it attracts significant weight. It does not accept the description of the location as "highly sustainable", for the reasons above.
- 4.6. *Affordable housing.* Paragraph 7.6 describes the 50% offer as "significantly exceeding the requirements of adopted planning policy and guidance", by comparison with the 40 per cent in Core Policy 3. That comparison is with the wrong figure. Policy GB8.1.a.ii requires, on Green Belt sites, a contribution 15 percentage points above the highest existing requirement, capped at 50 per cent. Forty plus fifteen is fifty five; the cap brings it to fifty. The scheme offers the minimum the NPPF requires for a site of this kind, and no more.
- 4.7. Further, compliance with the Golden Rules is a condition of the exception at GB7.1.g.iv, not a consideration weighing in favour of permission. Were it otherwise, every Green Belt scheme complying with GB8 would thereby establish very special circumstances, which cannot be the intention of a policy whose premise is that inappropriate development is by definition harmful.
- 4.8. The Parish Council makes a more fundamental point about the weight this benefit can carry. A percentage of affordable housing is a measure of tenure, not of affordability. Paragraph 7.8 of the Planning Statement relies upon a "chronic housing affordability crisis in the area". The Housing Needs Assessment prepared for the Wexham Neighbourhood

Plan by AECOM, which forms part of the Plan's evidence base, establishes that most of what the statutory definition calls affordable housing would not address that crisis here. No affordable home ownership product is affordable to a household on the lower quartile earnings in this area, whether one earner or two. The only tenures that deliver affordability to households on lower quartile earnings are Affordable Rent and Social Rent. It follows that the weight properly attaching to this benefit depends entirely on the tenure composition of the 50 per cent, and not on the 50 per cent itself. A scheme delivering its affordable housing predominantly as shared ownership at conventional shares would make no contribution to the affordability crisis on which the applicant relies.

- 4.9. On that question the Planning Statement commits to nothing. Paragraph 7.6 states that "tenure split and mix of affordable homes will be discussed and agreed with the Council". Policy WEX2 of the Neighbourhood Plan sets an indicative mix of 30 per cent one and two bedroom homes, 50 per cent three bedroom and 20 per cent four or more bedroom, and noting that paragraphs 6.57 to 6.59 of the Planning Statement recite Policy WEX2 and then address only the affordable percentage. The Council is asked to attribute significant weight to a benefit whose composition is undetermined, in circumstances where its own development plan evidence shows that half of the indicative composition would not be affordable to local households.
- 4.10. The size mix is likewise unaddressed. Policy WEX2 seeks a majority of one and two bedroom dwellings, and the Assessment identifies smaller units as a route to improving affordability. These are outline applications with all matters reserved except access. Nothing before the Council secures the mix, and nothing can, absent a condition or planning obligation.
- 4.11. Finally, NDMP GB8.3 permits a viability assessment demonstrating that it would not be possible to comply with the Golden Rules where a proposal is for a strategic site. The 50 per cent is therefore not immune from later reduction. The Parish Council's position is that the delivery of affordable housing is a real benefit and attracts weight, but that the weight is moderate rather than significant, and is contingent. It asks that, were the Council minded to grant permission, the affordable housing be secured in full, with the rented element secured at not less than the proportion sought by Policy WEX2, with the ownership element delivered through products the Assessment identifies as capable of achieving affordability in this area, with a size mix consistent with Policy WEX2, and without any viability review mechanism. Absent those securities, the weight properly attaching to this benefit is limited.
- 4.12. *Public open space and play facilities.* Provision of accessible green space is required by NDMP GB8.1.c. It is a condition of the exception relied upon, not a benefit. The Parish Council also observes that the land in question is open at present and is crossed by public rights of way. It is not a replacement for the golf course it would displace. It is open space for the residents of the development, not a sports facility, and cannot satisfy NDMP HC7.1.b or HC7.1.d.
- 4.13. *Biodiversity net gain of a minimum of 10 per cent.* This is the statutory minimum under the Environment Act 2021 and is mandatory. Delivery of a legal requirement attracts no weight as a planning benefit. The Parish Council notes that Policy WEX6 of the WNP encourages a 20 per cent net gain where achievable, which is not offered.

- 4.14. *Construction employment and expenditure by future residents.* Temporary, modest in scale, and common to development generally. The second limb duplicates the housing benefit already counted.
- 4.15. *Compliance with the Golden Rules.* Listed at paragraph 7.8 as a sixth, separate benefit. It is the label for the affordable housing and open space items already counted, and its inclusion double counts them.

The adverse effects

- 4.16. *Harm to the Green Belt.* Substantial, for the reasons set out above. It attracts substantial weight under NDMP GB6.2 and does not appear in the applicant's balance at all. Paragraph 7.7 of the Planning Statement states that, subject to mitigation, "no other harms have been identified". That is wrong. On the Parish Council's case the development is inappropriate, and harm by reason of inappropriateness attracts substantial weight. Independently of that, a conclusion that development is not inappropriate is not a conclusion that it causes no harm. Land which is open ceases to be open when it is built upon, and the NPPF directs that substantial weight be given to harm to the Green Belt including harm to its openness.
- 4.17. *Transport.* The applicant records no adverse transport effect. That conclusion rests on a Transport Assessment which omits background traffic growth, tests the year of opening rather than five or ten years after completion, does not use the strategic model the Council requested at the pre-application meeting of 15 July 2026, proceeds on a directional distribution inconsistent with observed flows on Wexham Street, does not characterise existing queueing, and assesses eight of the eleven locations of established local concern not at all, including at the school drop off and pick up times when conditions are worst. The Council cannot record zero harm on the strength of an assessment which does not test for it.
- 4.18. *Loss of recreational land and facilities.* The application would reduce a well-used public golf course from 18 holes to nine and, with the companion Wexham Grange application, remove 18 of the centre's 27 holes. The applicant treats the loss as having no material impact. For the reasons set out above, no surplus has been clearly shown and nothing is replaced, contrary to NDMP HC7, Core Policies 5 and 6 of the SBCS and Policy WEX12 of the WNP. This attracts significant weight.
- 4.19. *Conflict with the development plan.* The proposal conflicts with saved Policy GB1 of the SBLP, the development falling within none of its exceptions and, for the reasons given above and within none of the exceptions at NDMP GB7. It conflicts with Core Policy 7 of the Core Strategy, which seeks to promote accessibility to services and facilities. It conflicts with Policy WEX1 of the Wexham Neighbourhood Plan, which permits development outside the defined Rural Settlements only where it falls within an exception to inappropriate development under the NPPF, demonstrates very special circumstances, or is a strategic allocation, and which requires all proposals to restrict, individually or cumulatively, physical and visual coalescence and loss of separate identity, further coalescence between the parish settlements and Slough being strongly resisted. The Planning Statement does not mention Policy WEX1 at any point. It also conflicts with Core Policies 5 and 6 of the SBCS and with Policy WEX12 of the WNP, the golf centre being a community facility shown on Figure 18 of that Plan and none of the requirements of Policy WEX12.B being met

4.20.*Cumulative effects.* The applicant's Environmental Statement treats this application as part of a single project of up to 680 dwellings whose impacts are interrelated. Section 7 of the Planning Statement balances 450. No balance of the project has been presented to the Council. The only document before the Council which assesses the project as a whole is the Golf Needs Assessment, and it does so in order to conclude that removing 18 of the centre's 27 holes would have no material impact.

The balance

4.21. On the harm side of the balance stands the loss of 28 hectares of open land, and with the companion proposal at Wexham Grange 43.7 hectares, carrying northwards the projection of development which already extends from Slough along Wexham Road to Wexham Park Hospital. That harm attracts substantial weight. To it must be added the transport harm which the applicant's assessment does not test for, the loss of 18 holes of a well-used public golf centre without any surplus being shown or any replacement being made, the conflict with the development plan including with a neighbourhood plan made three months ago, and the absence of any assessment of the cumulative effects of the project of which this application forms part.

4.22. On the other side, the only benefit attracting significant weight is the delivery of market housing. The affordable housing attracts moderate weight, and moderate weight only if secured in the form which the development plan evidence shows to be effective. The remaining matters relied upon are requirements of the policy under which permission is sought, statutory obligations, or duplications.

4.23. Taken together, these considerations do not clearly outweigh the harm identified. Very special circumstances do not exist.

4.24. Were the Council to conclude that the development is not inappropriate, the Parish Council would submit in the alternative that, applying NDMP S5.5, the benefits are substantially outweighed by the adverse effects when assessed against the national decision-making policies in the NPPF.

4.25. The Parish Council requests that planning permission be refused.

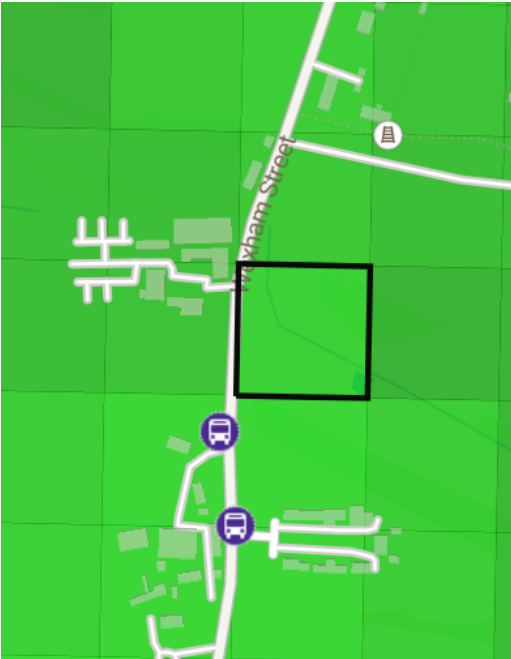
Guidance

[Connectivity Tool \(/\)](#) > [Map \(/app\)](#) > Score breakdown

Explore the score

Please see [Interpreting Connectivity Scores \(/help/interpreting-connectivity-scores\)](#) for guidance

Square ID	498950_183150
Local authorities	Buckinghamshire
Latitude	51.538588
Longitude	-0.574666



Overall

Type	National score	National Distribution
Overall (except driving)	53	Low (20-30%)
Public transport	58	Low (20-30%)
Walking	43	Very low (10-20%)
Cycling	66	Below average (30-40%)
Driving	86	Slightly below average (40-50%)

Education

Type	National score	National Distribution
Overall (except driving)	54	Low (20-30%)
Public transport	66	Below average (30-40%)
Walking	41	Low (20-30%)
Cycling	76	Slightly above average (50-60%)
Driving	87	Very high (80-90%)

Leisure

Type	National score	National Distribution
Overall (except driving)	40	Very low (10-20%)
Public transport	46	Very low (10-20%)
Walking	30	Lowest (0-10%)
Cycling	54	Very low (10-20%)
Driving	77	Very low (10-20%)

Health

Type	National score	National Distribution
Overall (except driving)	53	Below average (30-40%)
Public transport	60	Below average (30-40%)
Walking	43	Low (20-30%)
Cycling	66	Slightly below average (40-50%)
Driving	89	Very high (80-90%)

Shopping

Type	National score	National Distribution
Overall (except driving)	48	Very low (10-20%)
Public transport	52	Very low (10-20%)
Walking	41	Very low (10-20%)
Cycling	61	Very low (10-20%)
Driving	83	Very low (10-20%)

Residential

Type	National score	National Distribution
Overall (except driving)	62	Below average (30-40%)
Public transport	61	Slightly below average (40-50%)
Walking	59	Low (20-30%)
Cycling	73	Slightly above average (50-60%)
Driving	93	High (70-80%)

Workplaces

Type	National score	National Distribution
Overall (except driving)	59	Slightly above average (50-60%)
Public transport	62	Slightly above average (50-60%)
Walking	46	Below average (30-40%)
Cycling	66	Above average (60-70%)
Driving	86	Very high (80-90%)