Stoke Poges Parish Council

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PLANNING APPLICATION PL/26/07779/FA

Demolition of the existing changing block and removal of tennis courts at Farnham Park Playing Fields and development comprising enhanced community sports facilities and a community sports hub building including changing facilities and associated ancillary uses such as café and office uses, floodlit 3G football pitch, floodlit padel courts, walking route, landscaping and associated works; Change of use of part of South Buckinghamshire Golf Course (Class F2) to a football training facility (Sui Generis), and development comprising football pitches, a performance centre building, indoor training pitch, spectator seating, maintenance facilities, parking, cycle parking, access roads, service and delivery areas, alterations to the existing access arrangements, public right of way and permissive path works, drainage and attenuation features, floodlighting, landscaping, boundary treatments and associated works; and Reconfiguration and development of the remainder of the golf course to provide a revised golf course layout including a practice range and academy course.

Farnham Park Playing Fields & South Buckinghamshire Golf Course Buckinghamshire SL2 3BP

REPRESENTATION PREPARED BY LEANI HAIM MRTPI, ONH PLANNING FOR GOOD AND COLIN MILES BSc CEng MICE MIHT ON BEHALF OF STOKE POGES PARISH COUNCIL

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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.

The Parish Council's comments on the determination of the application

The Parish Council notes that the Stoke Poges Task Force has asked the Secretary of State to call in the application under section 77 of the Town and Country Planning Act 1990. The Parish Council also notes that, if the Council does not propose to refuse permission, paragraph 11 of the Town and Country Planning (Consultation) (England) Direction 2024 requires it to consult the Secretary of State.

Unless the Secretary of State calls in the application, the Parish Council considers this to be an own-interest application within regulation 6(1)(b) of the Town and Country Planning (Discharge of Local Planning Authority Functions) (England) Regulations 2026. Buckinghamshire Council is the freeholder of the site and sole corporate trustee of the charity that holds it, and granted the applicant's lease in August 2026 (Case for the Development, para 2.7; Planning Statement, para 7.41). It asks the nominated member and nominated officer to refer it to committee, in the interests of transparency and public accountability. If the application is not treated as own-interest, it plainly meets the test in regulation 5(3). It raises issues of economic, social and environmental significance to the local area, and significant planning matters having regard to the development plan, including inappropriate development in the Green Belt and the loss of recreational land.

Whichever route the application takes, the Parish Council has set out its concerns in this representation.

Summary of Representation

- The Parish Council objects to the application. As submitted, it should be refused.

- Elements of the scheme are inappropriate development in the Green Belt. The applicant understates the harm to openness and to the Green Belt purposes, and does not acknowledge the harm to the setting of heritage assets.

- The case for very special circumstances rests on there being no alternative site. The site search has not been published, and its threshold is nearly three times the area the Hub needs.

- The community benefit of the Hub is overstated. Community use would be available only when the Club is not using it.

- None of the benefits relied on is secured. Without that, they cannot carry the weight the applicant gives them.

- The applicant's conclusions on landscape, ecology, noise and lighting depend on assumptions and controls that are not fixed. Key information, including survey results and further assessments, is still outstanding.

- Overspill parking has not been addressed, and the Club cannot enforce parking on the public highway. Water supply for the scheme is not confirmed.

- The reduction in golf has not been assessed against the wider loss of golf proposed in the same area.

- The scheme does not deliver Route 7, the walking and cycling route the Stoke Poges Neighbourhood Plan identifies across the site.

- The Parish Council recognises the investment proposed at Farnham Park. The conditions and obligations in Section 3, and the outstanding information, are the minimum needed before the Council could consider whether the objection is overcome.

1. Relevant Policies

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

- Core Policies 5 – 9 and 13 of the South Bucks Core Strategy 2011 (SBCS)
- Policies GB1, EP3, EP4, TR5 and TR7 of the South Bucks Local Plan saved policies 1999 (SBLP)
- Policies SP7, SP9, SP11 and SP12 of the made Stoke Poges Neighbourhood Plan (SPNP) for that part of the scheme that lies within the designated Stoke Poges Neighbourhood Area
- Policies FAR2, FAR7, and FAR10 of the Farnhams Neighbourhood Plan (FNP) for that part of the scheme that lies within the designated Farnham Royal Neighbourhood Area

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:

- DM3.1.c which requires the local planning authority to take account of representations on the proposals;
- DM6 in using planning conditions and obligations;
- GB6 and GB7 on development in the Green Belt;
- HC4 on new community facilities and HC7 on existing recreational land and facilities;
- DP3 and P3 on design, landscape and amenity;
- HE5, HE6 and HE7 on heritage assets;
- N1 – N3 on the natural environment;
- F8 on water and flooding;
- TR6 and TR8 on transport and access matters.

1.3. Paragraph 2 of Annex A (Implementation) to the latest NPPF makes it clear 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. This includes policies in made neighbourhood plans. 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.

1.4. The Planning Statement (paragraph 6.4) asserts that the SBLP is out of date "due to the age of the Local Plan and the fact that it relates to the former South Bucks District Council". That is not the test in the NPPF. The age of a plan, or the authority that adopted it, is not in itself a reason to reduce the weight given to its policies. The saved policies remain part of the development plan, and the weight each carries depends on its consistency with the NDMPs, assessed policy by policy. In this respect, the Parish Council notes that:

a. SBCS Core Policies 6, 7, 9 and 13 are consistent with equivalent NDMP provisions and therefore continue to carry full weight;
b. SBCS Core Policy 5 is partly inconsistent, in requiring proposals to meet all five loss criteria, including that the site lies within a settlement excluded from the Green Belt. It therefore carries full weight for the protection and enhancement principle, and for the criteria on value, quality and local deficiency, which reflect NDMP HC7.1.a. It carries very limited weight for the requirement to meet all five criteria. Any loss of sport and recreation land should therefore be assessed against NDMP HC7;
c. SBCS Core Policy 8 is partly inconsistent, in departing from the balanced judgement required for local heritage assets. It therefore carries full weight for design but very limited weight for local heritage protection;
d. SBLP Policies EP3, EP4 and TR7 are consistent with equivalent NDMP provisions and therefore continue to carry full weight;
e. SBLP Policy GB1 is partly inconsistent, as it reflects older Green Belt categories of acceptable development. These categories carry very limited weight, and the Green Belt assessment should be made against NDMP Policies GB6 and GB7. Its amenity criteria (i) to (iv) are consistent with equivalent NDMP provisions and continue to carry full weight;
f. SBLP Policy TR5 is partly inconsistent, in applying a stricter test for highway capacity than NDMP TR6. It therefore carries full weight for criteria (a) and (c), on highway authority standards and the adverse effects of traffic on amenity and the character of the locality, including rural lanes. It carries very limited weight for criterion (b), on highway capacity;
g. SPNP Policies SP7, SP9 (Clauses A to D) and SP11 are consistent with equivalent NDMP provisions and therefore continue to carry full weight. Clauses E and F of Policy SP9 are not relied upon in this representation;
h. SPNP Policy SP12 is consistent with NDMP P3.2.e and therefore continues to carry full weight. The Plan was prepared and examined against an earlier version of the NPPF, which already required planning decisions to “limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation”. The current NDMP wording is materially the same. In any event, this representation relies principally on Clauses A.i, A.iii, A.iv and B; and
i. FNP Policies FAR2 (Clauses A, B and D), FAR7 and FAR10 are consistent with equivalent NDMP provisions and therefore continue to carry full weight. Clauses C and E of Policy FAR2 are not relied upon in this representation.

1.5. 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

Green Belt

2.1. The applicant accepts that the indoor pitch, the Performance Centre and the canopied padel courts are inappropriate development. It treats the rest of the Hub as appropriate under NDMP GB7.1.f.iv. It describes the harm to openness as “very much at the lower end of the scale” and the conflict with Green Belt purposes as “negligible to non-existent” (Planning Statement, paragraphs 7.30 and 7.34). It relies on very special circumstances based on need, the transformation of the site and community benefits.

2.2. Under NDMP GB6, inappropriate development should not be approved unless the harm to the Green Belt, and any other harm, is clearly outweighed by other considerations. Substantial weight must be given to the harm, including harm to openness. NDMP HC4 gives substantial weight to new community and sports facilities. That weight can only attach to benefits that are secured.

2.3. The Parish Council considers that the harm is understated and that the benefits are not secured.

2.4. The Hub would introduce about 13,865 sqm (GEA) of buildings onto open golf course land. This includes an indoor pitch of about 8,400 sqm and up to 18 metres high. The Parish Council considers the harm to openness to be at least moderate. The Environmental Statement (ES) identifies significant visual effects at Year 1 on the diverted footpath, the golf course, Park Road and the nearest homes. Building on open parkland is also more than negligible encroachment under purpose (c).

2.5. The case for very special circumstances rests on the claim that no alternative site exists. The site search has not been published. It applies a 25 ha threshold, nearly three times the 8.96 ha the Hub occupies, and its geography is inconsistent: Harlington was discounted for lying outside Buckinghamshire, while Sunbury, also outside, was considered. Until the search is published and these points are explained, the claim that there is no alternative can carry no weight, and the need for the Hub on this site has not been shown.

2.6. The applicant also claims substantial weight for the community benefits of the Hub. Community use would be available only “when not in use by the Club” (Planning Statement, paragraph 7.78), and the Community Use Framework offers access during “school holidays, international breaks, selected weekends” (paragraph 7.83). That is residual access, not a community facility, and it should carry limited weight. The community gain the scheme offers is at Farnham Park, and even that is not secured. The scheme is presented as a package, but the only delivery mechanism offered is an unspecified phasing condition.

2.7. In order for the benefits claimed to carry weight in the balance they must be secured by conditions and obligations. The Parish Council sets out its proposed conditions and obligations in Section 3.

Landscape

2.8. The ES finds that wider landscape effects would be limited, because the boundary woodland would be retained. It identifies significant visual effects at Year 1 for the Hub at site level, the diverted footpath STP/26/1, golf course and clubhouse users, about 100 metres of Park Road at the entrance and the most westerly house on Stoke Court Drive. It concludes that all of these would reduce by Year 15 as planting matures.

2.9. SBCS Core Policy 9 seeks to conserve and enhance landscape character. SBLP Policies EP3 and EP4 require development to be compatible with the character of the locality and to retain and maintain landscape features. SPNP Policy SP12 requires proposals for external lighting to demonstrate a justifiable need, meet ILP guidance and reduce light scatter. Clause B requires details of measures to prevent or minimise light pollution to be submitted with the application. NDMP DP3 and N2.1.a and d require development to respond to its context, conserve natural features of visual value and integrate through landscaping. NDMP P3.2.e requires the impact of artificial light on local amenity and intrinsically dark landscapes to be limited.

2.10. The Parish Council's concern is whether the mitigation the ES relies on for the closest effects will work.

2.11. The ES assumes planting will grow 300 to 400 mm a year, reaching about 4.5 to 6 metres by Year 15. The indoor pitch would be up to 18 metres high and the Performance Centre about 10 metres. On the ES's own figures, planting at Year 15 would be well below the height of both buildings. The Parish Council does not consider that the predicted reduction in effects by Year 15 can be relied on. The significant visual effects identified at Year 1 are likely to persist for the closest receptors, including users of the diverted footpath and the nearest homes. The Parish Council also asks the Council's landscape officer whether the ES's low susceptibility rating is appropriate for the Hub area, where large buildings, fencing and floodlighting would be introduced onto open parkland.

2.12. The ES scopes out night-time effects on the basis that they "would be contained within the Site" (paragraph 6.42). Given the extent of the floodlighting proposed, and the requirements of SPNP Policy SP12 Clause B, the Parish Council asks for a night-time assessment or lit photomontages before determination, so that the effect on the landscape at night can be properly assessed.

Ecology and trees

2.13. The application finds no loss of ancient woodland or veteran trees, with standing-advice buffers applied (AIA, paragraph 2.2.3). It predicts biodiversity net gain of 13.96% in habitat units, 34.98% in hedgerow units and 10.22% in watercourse units (ES, paragraph 4.237). It accepts that lighting would rise "significantly above baseline levels" (paragraph 4.262), and that light-sensitive bat species, including barbastelle, were recorded. It finds no significant effect because floodlights would mainly be used from October to March, with "limited overlap" with the summer active season (paragraph 4.266). It relies on post-development monitoring to "inform" any changes to lighting (paragraph 4.267).

2.14. SBCS Core Policy 9 seeks the conservation and enhancement of biodiversity, and the maintenance of ecological corridors. SPNP Policy SP9 and FNP Policy FAR2 require development within or adjoining the Green Infrastructure Network to maintain and improve its functionality and connectivity. NDMP N2.1 requires development to connect to and strengthen ecological networks, minimise adverse impacts on biodiversity and secure long-term management of features that support nature. NDMP P3.2.e requires the impact of artificial light on nature to be limited.

2.15. The Parish Council's concern is that the ES's conclusion on bats depends on assumptions that are not secured and that key survey information is not yet before the Council.

2.16. Floodlight hours have not been set. The ES conclusion that there would be no significant effect on bats depends on floodlights being used mainly outside the summer months, so it holds only if that pattern of use is fixed by condition. The monitoring the ES proposes would "inform" changes to lighting, but nothing requires those changes to be made if adverse effects are found.

2.17. The Council's Senior Ecology Officer has placed a holding objection on the application (23 October 2026). The officer requires detailed bat and reptile survey results, and evidence of great crested newt District Licence registration, before determination. The officer also advises that Natural England must be consulted. The Parish Council supports the holding objection.

2.18. Other mitigation is left to future strategies, including for bats, invertebrates, great crested newts and long-term habitat management.

Noise

2.19. The ES concludes that noise from the use of the pitches and padel courts would not be significant at the nearest homes. That conclusion assumes half the pitches are in use at once (paragraph 9.97). The hours of use for the floodlit pitches and padel courts have not yet been set. The ES does not assess match days, spectators, any public address system or fixed plant, although the show pitch has a spectator stand and rooftop plant and heat pumps are proposed. Padel noise is assessed using a football noise figure (paragraph 9.56).

2.20. SBLP Policy EP3(f) does not permit uses that would harm the amenities of nearby properties through noise or disturbance. Policy GB1 criterion (i) requires development not to adversely affect the amenities of nearby properties. NDMP P3.2.b and d require noise to be avoided or mitigated to an acceptable level, and the character of tranquil areas to be maintained.

2.21. The Parish Council's concern is that the ES conclusions depend on assumptions that are not secured and on gaps in the assessment.

2.22. The conclusions hold only if pitch use and hours are fixed by condition. Padel produces a distinctive, repetitive impact noise that a football noise figure is unlikely to represent, so a padel-specific assessment should be provided. The assessment should also cover match

days, spectators, any public address system and fixed plant. The text and the table also disagree on which homes are most affected (R05 at paragraph 9.103, R03 at Table 9.17), and this should be corrected.

Lighting

2.23. Floodlighting is proposed for the Hub show pitch and 3G pitch, the Farnham Park 3G pitch and the padel courts. The Planning Statement says hours of use are "to be discussed with the Council during the determination of the Application" (paragraph 8.149). The Lighting Assessment reports compliance against pre-curfew limits only (paragraph 8.148). The application does not refer to SPNP Policy SP12.

2.24. SPNP Policy SP12 requires proposals for external lighting to demonstrate a justifiable need, meet ILP guidance and use energy-efficient lighting that reduces light scatter. Clause B requires an appropriate lighting scheme to be secured by condition. SBLP Policy EP3(f) and NDMP P3.2.b and e require artificial light to be avoided or mitigated so that it does not harm local amenity, intrinsically dark landscapes or nature.

2.25. The Parish Council accepts that floodlighting a training ground is normal and is not in itself a reason to resist the scheme. Its concern is that the hours and controls on which the assessment depends are left open.

2.26. Floodlight hours and a curfew should be fixed. Compliance should also be shown after the curfew, not only before it. Local experience supports firm controls: floodlight hours at the existing padel courts were extended by a later variation (PL/23/3905/VRC). The Parish Council asks to be involved in setting the hours and consulted on any later change.

Heritage

2.27. ES Chapter 7 finds minor adverse effects on the setting of Stoke Park registered park and garden (Grade II) and conservation area, Stoke Poges West End conservation area, and nearby listed buildings, including Gateside Lodge and its gates and railings, Tithe Farmhouse, and the rustic arch formerly belonging to Stoke Court. The Planning Statement says the significance of these assets would be "preserved" (paragraph 8.44). Archaeological evaluation is still "being undertaken" (paragraph 8.42). The mound at Yew Place, a non-designated asset, faces "partial or complete loss".

2.28. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires special regard to be had to the desirability of preserving the setting of listed buildings. NDMP HE6 requires substantial weight to be given to the conservation of designated heritage assets and treats any harm as "a matter of considerable importance and weight". NDMP HE7 requires a balanced judgement where non-designated assets are harmed. SPNP Policy SP7 requires the same balanced judgement for the Local Heritage Assets identified in the Neighbourhood Plan. The ES identifies several of these along Park Road, including the Stoke Park Farm wall, the Orangery, the former Market Garden Building and Garden Cottage, but does not refer to Policy SP7.

2.29. The Parish Council's concern is that the harm the ES identifies is not acknowledged in the planning case.

2.30. Harm that the applicant's own ES identifies cannot be described as preserving significance. It must be given considerable importance and weight. It also forms part of the "any other harm" to be weighed in the Green Belt balance. The ES notes that the effects on setting depend on how activity, lighting and noise are controlled, so the controls sought under those issues matter here too. The results of the archaeological evaluation should be available before determination.

Sport, golf and community use

2.31. The applicant relies on NDMP HC7.1.b for Farnham Park, and on HC7.1.d for the golf course, where the Hub would replace part of the course with alternative sports provision (Planning Statement, paragraphs 7.110 and 7.111). The application treats South Buckinghamshire Golf Course as an 18-hole course to be reduced to a 12-hole course, with a 6-hole academy course and a practice range. The Golf Needs Assessment finds local supply and demand to be "currently around the right level – any significant loss of provision would tip this towards demand outweighing supply".

2.32. NDMP HC7.1.d permits the loss of recreational land only where the benefits of the alternative provision clearly outweigh the loss. NDMP HC4 gives substantial weight to new or improved community facilities. SBCS Core Policy 5 seeks to protect and enhance sport and recreational facilities. FNP Policy FAR7 identifies Farnham Park Playing Fields as a local community use.

2.33. The Parish Council's concern is that the golf baseline is not accurately described, that the cumulative loss of golf is not assessed, and that none of the golf or community benefits is secured.

2.34. The application describes South Buckinghamshire Golf Course as an 18-hole course, but it is not operating as such at the moment. The Council should be clear which baseline it is using. Either way, 18-hole capacity has already gone in practice, which makes early delivery of the replacement facilities more important.

2.35. The applications at Gallions Park and Wexham Grange (PL/26/06178/OA and PL/26/06177/OA) would remove 18 of Wexham Park Golf Centre's 27 holes, including its only 18-hole course, within the same catchment. The applicant's own ES lists those schemes as cumulative development (paragraph 9.112), but the Golf Needs Assessment does not consider them. Given the assessment's own finding that any significant loss would tip the balance, the judgement under HC7.1.d should be made with the combined loss in view. The Parish Council asks for the assessment to be updated with a cumulative scenario, confirmation that Uxbridge Golf Centre, closed since January 2025, is not counted as available supply, confirmation that Stoke Park, with green fees of £155 to £175, is not counted as available supply, and for England Golf to be consulted, given that the assessment is said to have been prepared under its guidance.

2.36. The Parish Council made the same point in reverse on those applications, whose needs assessment does not deduct the reduction at South Buckinghamshire. If all three proposals

proceed, the area would have no pay-and-play 18-hole course for juniors to progress to, and Wexham Park is an England Golf Junior Hub.

2.37. The golf benefits claimed for beginners, juniors and families depend on pay-and-play access, pricing and programmes, none of which is committed. Community access to the Hub is residual, and the Community Use Framework does not cover the Farnham Park 3G pitch or padel courts. Existing clubs and golfers also need continuity of use while the works take place.

Drainage and water

2.38. The ES predicts a beneficial effect on surface water flooding. Peak irrigation demand is 941 m^3 a day, or 29,195 m^3 in August, and relies on new applications for mains supply. If mains supply is not available, the fallback is a borehole, or failing that a redesign of the drainage strategy with "a significant increase in pitch infrastructure costs" (ES, paragraphs 5.51 to 5.53). Thames Water advises that the foul water network, the sewage treatment works and the water supply network cannot currently accommodate the development. It notes that the development may lead to low or no water pressure (15 October 2026), and that network modelling can take 9 to 12 months.

2.39. SBCS Core Policy 13 requires all new development to be water efficient. SBCS Core Policy 6 requires development to provide for the infrastructure needs arising from it. NDMP F8 requires sustainable drainage, and NDMP P3.2.f requires impacts on water quality to be assessed and mitigated.

2.40. The Parish Council raises no challenge on flood risk, which is a matter for the Lead Local Flood Authority. Its concern is that water supply for the scheme is not confirmed, and that existing residents should not bear the consequences.

2.41. The Parish Council supports the conditions Thames Water requests, but they deal with the consequence, not the problem. Thames Water says network modelling can take 9 to 12 months and will not begin until permission and a phasing plan are in place. The irrigation demand of up to 941 m^3 a day depends on a mains supply that is not confirmed, and the fallback options would require the drainage strategy to be redesigned. On the information available, the Council cannot be satisfied that the scheme can be supplied without affecting water pressure for existing residents. Supply should be confirmed before determination.

Rights of way and SPNP Route 7

2.42. Footpath STP/26/1 would be diverted around the Hub, and footpath STP/27/2 would be stopped up. Permissive paths are also proposed. The landscape plans appear to show an eastern access to the site retained, but they do not make clear whether it would have the status of a public right of way. The application does not refer to Route 7 in the SPNP.

2.43. SPNP Policy SP11 requires development within or adjacent to the Local Access Network to sustain and, where practicable, enhance its functionality. It does not support proposals that harm the network's function or connectivity. Appendix E (section 4.3.2) identifies Route 7, a new footpath along the edge of the golf course from the end of Stoke Court Drive to

the existing footpath at the southern end of Parsonage Lane. The route would give "an almost traffic-free route" to Farnham Royal, which "at present is impossibly dangerous unless in a motor vehicle". Section 6.4 lists this route as a priority for planning obligations. FNP Policy FAR10 sets the same requirement for the Farnham Royal part of the site. NDMP TR8 requires development to protect and enhance rights of way, and to take opportunities to extend, link and improve routes.

2.44. The Parish Council's concern is that the scheme protects the network only in part and misses the one opportunity the SPNP identifies on this site.

2.45. Route 7 crosses council-owned land within the application site, and the scheme reconfigures the very land it would cross. This development is the opportunity to deliver it. The route should be dedicated as a public footpath as a minimum, and as a cycleway if achievable, as the Neighbourhood Plan intends. It should be surfaced for bikes, buggies and wheelchairs, and include a safe crossing of the widened Hub access road, subject to a Road Safety Audit. Any eastern access replacing STP/27/2 should also be a public right of way, not a permissive path. The diverted STP/26/1 should be fully surfaced. Local people should be involved in the detailed design.

Transport

2.46. The Transport Assessment concludes that the traffic impact "is minimal and would not have a severe adverse impact on the transport network". The junction modelling uses 2029, the expected year of opening. The ES says all assessments considered the cumulative schemes, including Sefton Park, Gallions Park and Wexham Grange, but the Transport Assessment does not show how that traffic has been added. The Framework Travel Plan provides for five years' monitoring but sets no targets. A Car Park Management Plan is submitted.

2.47. SBCS Core Policy 7 seeks a safe and sustainable transport network, using travel plans and parking management. SBLP Policy TR5 requires development to meet highway authority standards. It also requires that traffic does not harm the amenities or character of the locality, including rural lanes. SBLP Policy TR7(d) seeks to avoid non-residential on-street parking in residential areas. NDMP TR6.3 requires reasonable future scenarios and cumulative impacts to be assessed. NDMP TR6.1.b requires a travel plan showing how sustainable transport objectives will be delivered, monitored and managed.

2.48. The Parish Council's advisers accept the Transport Assessment's methodology, trip generation, mode split, distribution, accident review and Stage 1 Road Safety Audit. The Parish Council accepts the conclusion that the impact would not be severe, provided the applicant confirms that the conclusion still holds on the points below, including the assumptions identified in paragraph 2.50. The Parish Council's advisers also find no significant additions to traffic on Bells Hill/Grays Park Road, West End Lane or Park Road. Where junctions exceed capacity, most already do so before development traffic is added.

2.49. The usual requirement is to test the network five years after opening, so a 2034 assessment should be provided. The applicant should confirm how cumulative development traffic has been included. The site is not well located for sustainable travel: the DfT Connectivity Tool gives an overall score of 54. Most trips will come from further afield,

and the bus routes and stops do not match where visitors will travel from. The car-based mode split used in the assessment reflects this and should be acknowledged. The Travel Plan should therefore set a target of at least a 10% reduction in single-occupancy car trips, as would normally be expected in Buckinghamshire.

2.50. The Car Park Management Plan shows Hub demand exceeding its own 116 spaces at peak times, relying on spare capacity in the golf car parks. The Plan does not cover Farnham Park, where the new floodlit facilities may extend use into the evenings. Its only measure for local streets is advice to users not to park off-site, and the Club has no power to enforce parking on the public highway. If overspill occurs, the remedy would be waiting restrictions, which would urbanise rural lanes and whose cost would fall on the public purse rather than the applicant. The Parish Council does not accept that overspill has been addressed. In line with SBLP Policy TR7(d), a full plan is needed covering both sites and match and event days, with monitoring of local streets, and the applicant should fund any restrictions found to be needed.

2.51. The parking and traffic forecasts for the Hub rely on a draft training and match schedule which, for safeguarding reasons, is not published. The Transport Assessment says it has been discussed with the Council (paragraph 6.1.3). The Parish Council asks the Council to confirm that it has verified the schedule and the assumptions derived from it, and to explain in the officer's report what was agreed. The worst case assessed covers only maximum spectator numbers at U18 and U21 games (paragraph 6.3.4). It does not test:

- fewer people per car than the car-sharing rates the Travel Plan describes as targets;
- peak weekend golf demand;
- community use and events;
- Farnham Park.

The applicant should test the busiest realistic combination of these. The Car Park Management Plan should identify overflow parking within the site, so that any demand above the forecasts is kept off local roads. Use of the Hub should be limited by condition to the levels assessed.

2.52. The Transport Assessment predicts no additional traffic on West End Lane. Local knowledge is that drivers already use a route via Templewood Lane, Duffield Lane, Rogers Lane and West End Lane to avoid congestion on Beaconsfield Road (A355), and that route leads directly to the Park Road entrance to the site. These are narrow rural lanes, and SBLP Policy TR5(c) requires that traffic does not harm the amenities or character of the locality, including rural lanes. The Parish Council asks the applicant to test whether Hub traffic, particularly staff, players and visitors arriving from the A355, would use this route at peak times. If it would, appropriate measures should be secured. These could include routing directions in the Travel Plan and the Construction Traffic Management Plan, and monitoring of traffic on West End Lane.

3. Conditions and obligations

3.1. The benefits relied on in the case for very special circumstances can carry weight only if they are secured. NDMP DM6 provides that obligations should be used only where a condition cannot address the matter. The Council is the freeholder, and an obligation entered into by the applicant would bind only its leasehold interest. The Parish Council therefore asks that the community benefits are secured by condition wherever possible, so that they run with the land. Where an obligation is needed, the officer's report should explain how it would continue to bind the site if the lease ends or is transferred.

3.2. The Parish Council asks that the following are secured by condition:

a. **Phasing.** The Farnham Park community works, and the reconfigured 12-hole course, academy course and range, are completed before the Performance Centre is occupied. Until then, the existing golf course remains open for public pay-and-play.
b. **Community Use Agreement.** An agreement in Sport England form, covering the Hub and the Farnham Park 3G pitch and padel courts. It should set minimum hours, pricing, priority for local clubs and schools, and annual monitoring.
c. **Future growth.** Removal of permitted development rights for new buildings, hardstanding and additional external lighting.
d. **Hours and lighting.** Hours of use and a floodlight curfew for all floodlit pitches and the padel courts, including weekends and bank holidays, with tighter limits from May to August consistent with the ES ecology assumptions. The scheme should include:
    i. automatic switch-off;
    ii. building, car park and path lighting switched off outside operating hours;
    iii. retention of the padel canopies;
    iv. a post-installation lighting survey.

    The hours to be fixed by condition, so that any later change requires a planning application.
e. **Noise.** A Noise Management Plan covering pitch scheduling, match and event days, any public address system and a complaints contact. It should also set a fixed plant noise limit and grounds maintenance hours.
f. **Landscape.** Advance structural planting in the first planting season, using larger stock facing the indoor pitch. It should also cover:
    i. retention of the boundary tree belts;
    ii. recessive, non-reflective finishes;
    iii. approved fencing and netting details.

    Replacement of failed planting, and long-term landscape management aligned with the Habitat Management and Monitoring Plan.
g. **Ecology.** A sensitive lighting strategy with dark corridors. Post-development bat monitoring, with a binding requirement to amend lighting if adverse effects are found. Also the bat, invertebrate and great crested newt mitigation strategies, and a biodiversity Construction Environmental Management Plan.
h. **Heritage.** An archaeological written scheme of investigation, if the evaluation is not complete before determination.
i. **Water.** The Thames Water conditions on foul water, sewage treatment and water supply. A water supply and irrigation strategy approved before commencement,

showing no reduction in water pressure for existing residents. A lifetime SuDS management plan.

j. **Rights of way.** Detailed design of Route 7 and the diverted STP/26/1, prepared in consultation with the Parish Council and local people. The diverted STP/26/1 fully surfaced.
k. **Construction.** A Construction Traffic Management Plan routing vehicles away from unsuitable local lanes, with working hours and community liaison. A construction phasing plan keeping existing Farnham Park users and golf play operating throughout the works.
l. **Car parking.** A final Car Park Management Plan for both the golf course and Farnham Park, approved before the Hub is occupied. It should cover:
    i. match and event days, and the shared use of the golf car parks at peak golf times;
    ii. monitoring of parking on nearby residential streets, including Park Road, Stoke Court Drive and West End Lane, and around Farnham Park;
    iii. remedial measures if overspill occurs;
    iv. review if the use of the site changes;
    v. identified overflow parking areas within the site.
m. **Sustainable travel.** Site access improvements, cycle parking, EV charging and car sharing measures delivered as proposed.
n. **Operational limits.** Use of the Hub to be in accordance with an approved operating schedule, setting limits on simultaneous sessions, matches and spectator numbers. Events outside the schedule should require separate approval. Compliance should be monitored through the Car Park Management Plan and Travel Plan.

3.3. The Parish Council asks that the following are secured by planning obligation:

a. **Route 7.** Route 7 dedicated as a public footpath as a minimum, and as a cycleway if achievable. Surfaced for bikes, buggies and wheelchairs, including a safe crossing of the Hub access road subject to a Road Safety Audit, and delivered before the Hub is first occupied. Any eastern access replacing STP/27/2 also dedicated as a public right of way. The permissive paths kept open to the public, and maintained, for the life of the development. Where a path forms part of a through route, it should be dedicated as a public right of way.
b. **Golf.** The 12-hole course, academy course and range kept open for public pay-and-play use for the lease term, with affordable pricing and a junior category, so that the benefits claimed for beginners, juniors and families are delivered. No further reduction of golf without planning permission.
c. **If the training use ends.** Transfer of the facilities to community sport, or removal and restoration.
d. **Travel Plan.** Routing directions for Hub traffic away from West End Lane and the connecting lanes, and monitoring of traffic on West End Lane. Monitoring for at least five years, a target of at least a 10% reduction in single-occupancy car trips, remedial measures if it is not met, and the academy minibus service.
e. **Habitat management.** A 30-year Habitat Management and Monitoring Plan, including rhododendron removal from Old Orchard Wood, with monitoring reports shared with the Parish Council. Public access to the informal recreation space in the northern part of the site, as offered in the Design and Access Statement, should be secured along defined routes compatible with the plan.

f. **Contributions.** The sustainable travel and off-site highway contributions in the applicant's heads of terms, with the measures they fund identified in the agreement. The Parish Council asks that improvements to the Local Access Network within the parish are considered, including at the Key Locations identified under SPNP Policy SP11.D and the routes listed at section 6.4 of the Neighbourhood Plan. It also asks to be consulted on the measures chosen.

g. **Parking restrictions.** Funding for monitoring on-street parking, and for any Traffic Regulation Order and associated works found to be needed as a result of overspill, so that the cost does not fall on the parish or its residents.

3.4. The Parish Council asks to be consulted on the draft conditions and the draft agreement before determination.

4. Conclusion

The applicable test

4.1. The applicant accepts that elements of the scheme are inappropriate development in the Green Belt. Under NDMP GB6, permission should not be granted unless the harm to the Green Belt, and any other harm, is clearly outweighed by other considerations. Substantial weight must be given to the harm to the Green Belt. NDMP HC7.1.d also requires the benefits of the alternative sports provision to clearly outweigh the loss of golf.

The benefits of the scheme

4.2. The Parish Council recognises that the scheme offers significant benefits:

- a Category 1 training facility and academy for the wider area's only professional football club;
- investment in the facilities at Farnham Park;
- a floodlit 3G pitch, a new community sports hub and padel courts;
- a more accessible golf offer;
- biodiversity net gain above the statutory minimum.

4.3. Under NDMP HC4 these benefits attract substantial weight only where they are secured.

The adverse effects

4.4. Against those benefits, the Parish Council considers that the following must be weighed:

- harm to the Green Belt by reason of inappropriateness, at least moderate harm to openness, and encroachment into the countryside;
- significant visual effects that are unlikely to reduce as the ES predicts;
- harm to the setting of designated heritage assets, which is a matter of considerable importance and weight;
- a reduction in golf provision, in a catchment where further losses are proposed;
- effects from lighting, noise and traffic, whose acceptability depends on controls not yet secured;
- a missed opportunity to deliver Route 7, contrary to SPNP Policy SP11.

The balance

4.5. Whether the benefits clearly outweigh the harm depends on them being secured and on the harm being properly assessed. As submitted, the scheme secures none of the benefits on which its case for very special circumstances rests. Information the Council needs to assess the harm is also still outstanding:

- publication of the full site search, with an explanation of its threshold;
- the bat and reptile surveys and the great crested newt licensing evidence;
- the Natural England consultation;
- a night-time landscape assessment;
- confirmation that the floodlighting complies with post-curfew limits;

- a padel-specific noise assessment, and assessment of match days, spectators, any public address system and fixed plant;
- the 2034 transport assessment, with confirmation of how cumulative traffic has been included and testing of the West End Lane route;
- confirmation that the Council has verified the training and match schedule, and a test of parking and traffic at the busiest realistic level of use;
- a cumulative golf scenario and consultation with England Golf;
- confirmation of water supply;
- the results of the archaeological evaluation.

4.6. On the material before the Council, very special circumstances have not been demonstrated. The Parish Council objects to the application, and as submitted it should be refused under NDMP GB6. The outstanding information, and the conditions and obligations in Section 3, are the minimum needed before the Council could consider whether the objection is overcome.