



## Buckinghamshire Councils Comments on the Stoke Mandeville Neighbourhood Plan Reg16 Submission Consultation



Comments from team	Policy or Para	Page	Comment
Development Management (DM)	Reference to AGT-2 Para 3.1	7	Only the southern part of AGT2 falls within the NP area and it should be noted that the new application red edge should be reflected if the planning application is to be shown.
DM	SEALR Phases 1 and 2 Para 3.3	7	It should be noted that both phases of the SEALR have planning permission and have been implemented.
DM	Settlement development Para 5.2	8	Reference to 'massive growth in housing numbers, but no recent proportionate development of community or leisure facilities' – not sure which planning applications relate to this but they will have required on-site provision or financial contributions to address the needs of the development, subject to being CIL compliant and to any viability issues considered at the time.
DM	The Built Environment Para 6.2, 6.3, 8.1	8, 9	Text comments that VALP allocates 2480 houses in the fields in the Parish and text references AGT1 and AGT2 – VALP D-AGT1 allocates at least 1000 dwellings and D-AGT2 allocates at least 1490 dwellings. Note that only part of AGT2 (18/04346/AOP) falls within NP area (some in Stone with Bishopstone and Hartwell) which should perhaps be clarified (this is mentioned in para 8.1 – approx. 400 are in the parish) Also question how they have calculated the number of dwellings to be provided on AGT2. Should the housing numbers etc be part of the plan? The VALP has housing allocations including for Stoke Mandeville, that is what should be referenced rather than apportioning dwellings to be delivered for AGT1 or AGT2. Also the formula for calculating the population that will arise from the proposed development should be same as VALP.
DM	Growth in population Para 8.1	9	Reference to AGT1 allocation of 1385 homes – where is this number from? VALP allocation refers to 'at least 1000 homes'. Note that submitted planning applications on AGT1 provide potentially up to 1437 dwellings, plus whatever comes forward on the Red House Farm land.

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Planning Policy	10.2	10	<p>The para needs to be amended as follows for accuracy on the SEA/HRA process that has been followed:</p> <p>10.2 Stoke Mandeville Parish Council , for an earlier draft of the neighbourhood plan, undertook a Strategic Environmental Assessment at the recommendation of the former Aylesbury Vale District Council, in consultation with Natural England, Historic England and the Environment Agency. Buckinghamshire Council then re-screened the plan for SEA and HRA in October 2023 and the statutory consultee responses concurred that <del>The screening process determined that</del> there was no necessity for either a Sustainability Appraisal or a Habitats Regulations <del>Strategic Environmental</del> Assessment to be undertaken for <del>with relation to</del> this Neighbourhood Plan</p>
DM	NP powers Para 11.1, 11.2, etc	10	Should they refer to NPPF (2023)?
DM	Community facilities Para 11.9	11	<p>Sport and Leisure Facilities SPG 2004 out of date? Ready Reckoner is being used in the absence of anything else to establish costs etc <a href="https://buckinghamshire.gov.uk.s3.amazonaws.com/documents/Ready_Reckoner_Final_August05_2022.pdf">https://buckinghamshire.gov-uk.s3.amazonaws.com/documents/Ready_Reckoner_Final_August05_2022.pdf</a></p> <p>Also mention AGT1 SPD as these references need for sports facilities.</p>
DM	Para 11.10	11	South Bucks sports facilities? The link also doesn't work.
DM	Green Infrastructure After para 11.12	11	Should reference AGT1 SPD
Planning Policy	11.10	11	Not sure why a South Bucks Sports Facilities Strategy would be relevant to Stoke Mandeville. Suggest just removing the reference as there is no Built Facilities or up to date Playing Pitch Strategy for Aylesbury Vale
Planning Policy	11.3	12	Please insert the Source of the Aylesbury Garden Town Masterplan (2020) as it is very faint and provide a link to it at <a href="#">Our Aylesbury regeneration plans   Buckinghamshire Council</a> . It was the Aylesbury Garden Town Partnership that adopted the Masterplan.



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Planning Policy	Section 9	10-13	The NPPF was significantly updated in December 2023 so the (2021) reference needs updating however the link at 9.4 on p.10 does go to the latest version whenever it gets updated.
DM	Transport and Travel Para 12.2	12	This could also reference VALP policies T1, T2, T3, T4 and T5? Policies T6, T7 and T8 relate to parking, cycle storage and EVC, also reference?
DM	Business Development Para 13.2	13	This could also reference VALP policy E1 as Triangle Business Park is a key employment site; also policies E2, E3 and E4?
DM	Para 13.3	13	Page reference to local centre in SPD incorrect, para ref is correct.
DM	Heritage After para 14.2	13	Heritage is also referred to in SPD – listed buildings and archaeology, therefore should also be referenced here?
DM	Design and Layout of AGT1 Para 15.2	14	Map refers to proposed AGT1 design and layout – should be referred to as the Framework Masterplan, this illustrates how the allocation could come forward, not that it is a proposed form of development (which would need to form part of a planning application).
Planning Policy	15.2	14	Please insert a link to the accessible published SPD from early 2024 though it is the version that was agreed in October 2023 <a href="https://www.buckinghamshire.gov.uk/s3.amazonaws.com">Aylesbury Garden Town -1 Supplementary Planning Document September 2023 (buckinghamshire-gov-uk.s3.amazonaws.com)</a>
DM	NP policies Para 19.10	20	What is the reference to 'Locality'?
DM	GI Para 20.5	22	4 <sup>th</sup> para – reference to 20.6 village fete?
Planning Policy	G11 and Appendix 2	23	Space No.5 - The Bucks Sports and Social Club - the map in Appendix 2 shows the entire site shown for designation which is an attempt to prevent the current planning application. The BS+SC has been disused for several years, it is a not a current facility and has security fencing and boarding to the amenity building windows. The AGT1 SPD Framework Masterplan <a href="https://www.buckinghamshire.gov.uk/s3.amazonaws.com">Aylesbury Garden Town -1 Supplementary Planning Document September 2023 (buckinghamshire-gov-uk.s3.amazonaws.com)</a> clearly shows at 4.1 there will be new sports pitches, public green spaces,

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			<p>play areas and a local community centre that will be in close proximity to Stoke Mandeville village. So the loss of a former facility and sports pitches at Bucks Sports and Social Club would not mean there is no equivalent provision (of what the BS+SC used to provide) in the parish/walkable to the Stoke Mandeville village. For the planning application which is pending please see <a href="#">22/03709/AOP   Outline application with access to be considered for redevelopment of the site comprising up to 100 residential units (Use Class C3) and the provision of green open space, together with associated landscaping and parking, widening of access and alterations to 149-151 Lower Road to accommodate widened access, and an internal link road to Booker Park School   Bucks C C Sports And Social Club Lower Road Stoke Mandeville Buckinghamshire (aylesburyvaledc.gov.uk)</a>. There is also the possibility that (in addition to new provision made on the AGT1 site) that the eventual decision on the planning application would through section 106 contributions) drawn up in line with the Council's Ready Reckoner <a href="https://www.buckinghamshire.gov.uk/documents/20830/Ready_Reckoner_Final_August05_2022.pdf">https://www.buckinghamshire.gov.uk/documents/20830/Ready_Reckoner_Final_August05_2022.pdf</a> and using Adopted VALP Policy I2) make provision to upgrade an alternative sports and leisure facility that may not be in the parish but be within a reasonable distance.</p>
DM	Local Green Spaces Policy	23/24	<p>Overall concern about the inclusion of some of the local green spaces that do not meet the criteria in NPPF.</p> <p>Also site 8 appears to include some of the open space which will be taken up in the development approved as part of phase 1 of the South East Aylesbury Link Road, the area of the Wendover roundabout (other open space is to be provided for the loss of part of the open space taken by the roundabout).</p>
DM	Green Buffer	25	<p>Note Planning Policy comments made on the green buffer between development on AGT1 and Stoke Mandeville village.</p> <p>The importance of a green buffer is accepted but during the progression of the SPD discussions were had about ensuring that exposed rear boundaries of existing properties be protected as much as possible, hence the back to back relationships proposed along with the location of the green buffer.</p>
Planning Policy	GI2 Green Buffer Policy and Policies Map	25 and 44	<p>The Adopted AGT1 SPD (see link above provided in comment to p.14) clearly shows the areas for green space shown as part of the SPD area that will be carrying out Policy D-AGT1 in the VALP and other relevant policies in the VALP. So it does not need to be and should not be in the neighbourhood plan as Green Buffer designations as it prejudices the proper planning of the area in line with the AGT1 Masterplan. It is for the Council to agree in planning decisions in the AG1 area how a development best responds to the SPD and the VALP.</p>

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			<p data-bbox="667 256 1261 300">  04 Framework Masterplan &amp; Design Guidance         </p>  <p data-bbox="667 991 772 1002">Framework Masterplan</p> <p data-bbox="1749 1038 1771 1050">43</p>
DM	Settlement boundary Para 23.1 and 23.2	27	<p data-bbox="651 1066 2033 1214">Settlement boundary doesn't follow site for AGT2 (within the NP area), also includes land which would really be outside of the settlement boundary, such as SEALR phase 2 land and the area around it. Perhaps the allocations should be highlighted as such and it be noted that development is likely to come forward in these areas?</p> <p data-bbox="651 1222 2033 1254">Policy does not acknowledge potential of rural exception sites or justified agricultural workers dwellings.</p>
Planning Policy	GI3	27	<p data-bbox="651 1265 2033 1409">It is considered with all the different character areas of Stoke Mandeville reflecting the very different periods of development that (rather than a single boundary for almost the entire parish including all its green spaces existing and proposed) there should be individual boundaries for the historic village and other built-up areas existing in the parish which have their own identity.</p>



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			It is inappropriate to draw a boundary for AGT1 and AGT2 as those areas don't yet exist yet and largely don't even have planning permission (outline and detailed) for where buildings would go for the entire sites.
DM	Community Facilities Policies Para 24.4	28	References CCG, not ICB.
DM	Para 24.15	29	NP intends to seek medical services are provided within the AGT1 development and not as per D-AGT1 policy, through financial contributions. The NP has to accord with the VALP. The current approach of the ICB is to secure financial contributions towards upgrading existing facilities in this locality and not on-site provision.
DM	Education facilities Para 25.1	30	The provision of new education facilities, where required, need to come forward at the right time in consultation with the Education Dept, this would be secured through the planning application process and associated legal agreements. Normally provision of such facilities, or financial contributions towards facilities, would be provided prior to occupation, not the sale or completion of properties.
DM	Para 25.3	30	Requirements referred to are quite onerous and beyond the scope of the NP?
DM	Medical and Pharmaceutical Facilities Para 26.2, 26.3	31	Reference CCG, not ICB.
DM	Sports and Leisure Facilities Para 27.4	32	Reference to AVDC SPG on Sport and Leisure is out of date. Policy needs to be consistent with VALP Policy I2, Appendix D and the Ready Reckoner.
DM	Para 27.5	32	Sport England are not a statutory consultee for <b>any</b> development – only where applicable.
Planning Policy	CF3	32	The final paragraph of the policy (27.3) - the VALP Policy I2 sets out how development for sport and leisure provision is to come forward. This covers any loss of or redevelopment of existing sites, extension or refurbishment of existing sites or completely new sites. Sport England played a part in contributing to the formulation of the VALP with consultation and its examination by an independent inspector and that plan is adopted now. It is not for the neighbourhood plan to say that the Council in



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			taking planning decisions on new sports facilities should follow Sport England-approved calculations of requirements because that contradicts the VALP Policy I2 on what the methodology is to be followed.
DM	Active Travel Para 29.2, 29.5	35	There is also the Aylesbury Garden Town Local Cycling and Walking Infrastructure Plan (LCWIP) produced to outline a comprehensive cycling and walking network for the town. I would strongly suggest that comments are also sought from the Highways Development Management Team on this NP, if you haven't already. Should the Bucks Sport and Social Club site be included in the list when this site has been closed for several years and is not available for public use?
Highways DM	TT2 – Traffic and Congestion  30.2	37	"These measures and contributions should be outlined in detail in a Travel Plan with a clear implementation time-scale and funding for measures and guarantees that measures are in place before houses can be sold on the development." The measures and contributions should be outlined in detail in a Transport Assessment and Travel Plan
Highways DM	TT2 – Traffic and Congestion  30.4	37	<i>"Provision of two vehicle access points to any development of over 200 houses to avoid traffic congestion from commuter traffic in rush hour."</i>  This is not a policy that Highways DM could support.  Where has the threshold of 200 houses come from and what evidence is there that having two accesses will avoid traffic congestion in rush hour?
DM	Traffic congestion Para 30.2	37	Travel Plans are sought for major developments (VALP Policy T4) and are normally required to be implemented prior to occupation, not before the houses are sold, although a Travel Plan Coordinator should be in place prior to occupation.
DM	Para 30.3, 30.4	37	Contributions will be sought to mitigate any development sought, and projects will be identified in discussion with the Highway Authority and developer, but cannot be sought to rectify historical issues. The list of contributions sought may not be appropriate in all cases. Change wording from 'should' to 'could'? Concern that raising matters better dealt with by VALP. Same for 30.4

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Highways DM	TT3 – Public Transport 31.2	39	<p><i>“Funding support through a Section 106 agreement to set up and cover the first two years’ running costs for a Community Bus or Dial-A-Ride Scheme, either in the Parish or in the Wendover and Villages Community Board area within which the Parish sits.”</i></p> <p>Why for the first two years? Highways DM would generally request five years.</p>
DM	Public Transport Para 31.1	39	Reference to 2500 houses, this specific number of homes is not identified.
DM	Business development Para 32.9	40	A local centre will be provided in AGT1 to include retail, but one is not required by policy for AGT2.
DM	Heritage Para 34.2, 34.3	42	Wording of policy should better reflect that of the VALP policy BE1 and NPPF. Also, impacts on heritage asset itself, not just setting, also archaeology. Should refer to public benefit, not community benefit.
Archaeology	H1	42	<p>This policy seeks to protect heritage assets, but refers only to buildings and structures, and does not include archaeological sites. A heritage policy should include all heritage assets.</p> <p>We would suggest that Policy H1 recommend that development proposals should, as a minimum, consult with the Historic Environment Record (HER) and consider the impact on the whole archaeological resource, and not just buildings and structures. This would be in accordance with paragraph 200 of the NPPF which states that in determining applications “As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. “</p> <p>The document could also include a plan showing the location of the Archaeological Notification Areas which fall within the NP area. For more detail see <a href="#">Map - Buckinghamshire's Heritage Portal</a></p>
Archaeology	334.5	42	<p>Buckinghamshire Council has indeed recently compiled a local list of heritage assets, which will include archaeological sites. Any future nominations to this list will need to be reviewed by an expert panel. Any archaeological sites confirmed on the local list will be taken into consideration in the planning process. For further information, see <a href="#">Home - Buckinghamshire's Local Heritage List (local-heritage-list.org.uk)</a></p>
DM	NP policies map	44	<p>Should the whole of AGT2 be shown, albeit that some is outside of the NP area, for clarity?</p> <p>Areas shown as green buffer, when some should be Local Green Spaces.</p> <p>VALP allocated land for AGT1 includes those areas shown as green buffer.</p>

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DM	Conclusion (and Foreword) Para 37.2	45	Every housing development required to include a minimum of 50% green space, even smaller developments? Change to 'should seek to achieve a minimum of 50% green infrastructure'?
DM	Para 37.3	45	Comment on green buffer as before.
DM	Para 37.4	45	Should clarify that the local green spaces are locally important.
DM	Appendix 2	50	References VALP 2023, not 2021
Planning Policy	Appendix 2	48	Green Spaces 1,2,3,4,5 are all in Buckinghamshire Council ownership. Has the Council's Property section been consulted and have they agreed that the designation is consistent with the present or any committed future uses for the land?
DM		52	Bloor development - Some of the land identified as local green space forms part of the South-east Aylesbury Link Road, Phase 2 site (22/03783/APP). Whilst it will be landscaped and will be open space, it is questioned whether this part should form part of designated local green space.
DM		52	Crest Nicholson Development – The approved development includes vehicular (inc bus) and pedestrian/cycle links up to the site boundary and should the development on AGT1 come forward and the ransom strip in between be overcome, these links would be important to provide accessibility and improved connectivity. They will cut through the local green space identified. Wording should be amended to acknowledge their potential future provision.
DM		53	Land off Patrick Way – part of the west corner forms part of the application site for phase 1 of the SEALR where the Wendover Road roundabout will be constructed. Replacement open space land will be provided as part of the SEALR application (to the south).
DM		56	Land between 15 Swallow Lane and 1 Irvine Drive – Not clear that this is of such importance that it should be designated as a local green space? Not clear that there is a route through to the playing fields? Not a public right of way through and overgrown?
Archaeology	Appendix 3	57	This appendix refers to the Buckinghamshire Local Assets Register. The actual name is the Buckinghamshire Local Heritage List. Point 3 Archaeological Remains, suggests that sites found during the HS2 works are to be added to the national register, or potentially the Local List. This is a misleading sentence. All archaeology found during the enabling works for HS2 have been excavated and reported on. They have since been removed and as such cannot be added to any register.

Our Ref: MV/ 15B901605

02 April 2024



Buckinghamshire Council  
[neighbourhoodplanning@buckinghamshire.gov.uk](mailto:neighbourhoodplanning@buckinghamshire.gov.uk)  
**via email only**

Dear Sir / Madam

**Stoke Mandeville Neighbourhood Plan - Regulation 16 Consultation  
February – March 2024  
Representations on behalf of National Gas Transmission**

National Gas Transmission has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

**About National Gas Transmission**

National Gas Transmission owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

**Proposed sites crossed or in close proximity to National Gas Transmission assets:**

An assessment has been carried out with respect to National Gas Transmission's assets which include high-pressure gas pipelines and other infrastructure.

National Gas Transmission has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.

National Gas Transmission provides information in relation to its assets at the website below.

- <https://www.nationalgas.com/land-and-assets/network-route-maps>

Please also see attached information outlining guidance on development close to National Gas Transmission infrastructure.

**Distribution Networks**

Information regarding the gas distribution network is available by contacting:  
[plantprotection@cadentgas.com](mailto:plantprotection@cadentgas.com)

**Further Advice**

Please remember to consult National Gas Transmission on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:





**Matt Verlander, Director**

[nationalgas.uk@avisonyoung.com](mailto:nationalgas.uk@avisonyoung.com)

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If you require any further information in respect of this letter, then please contact us.

Yours faithfully,



**Matt Verlander MRTPI**

**Director**

**0191 269 0094**

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**For and on behalf of Avison Young**

National Gas Transmission is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

#### Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Gas Transmission's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Gas Transmission have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Gas Transmission's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Gas Transmission's '*Guidelines when working near National Gas Transmission assets*' can be downloaded here: <https://www.nationalgas.com/document/82951/download>

#### How to contact National Gas Transmission

If you require any further information in relation to the above and/or if you would like to check if National Gas Transmission's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: [nationalgas.uk@avisonyoung.com](mailto:nationalgas.uk@avisonyoung.com)

Our Ref: MV/ 15B901605

02 April 2024

Buckinghamshire Council  
[neighbourhoodplanning@buckinghamshire.gov.uk](mailto:neighbourhoodplanning@buckinghamshire.gov.uk)  
**via email only**



Dear Sir / Madam

**Stoke Mandeville Neighbourhood Plan - Regulation 16 Consultation  
February – March 2024  
Representations on behalf of National Grid Electricity Transmission**

National Grid Electricity Transmission has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

**About National Grid Electricity Transmission**

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.

National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.

National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.

**Proposed development sites crossed or in close proximity to NGET assets:**

An assessment has been carried out with respect to NGET assets which include high voltage electricity assets and other electricity infrastructure.

NGET has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.

NGET provides information in relation to its assets at the website below.

- [www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/](http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/)

Please also see attached information outlining guidance on development close to NGET infrastructure.

**Distribution Networks**

Information regarding the electricity distribution network is available at the website below:

[www.energynetworks.org.uk](http://www.energynetworks.org.uk)

**Further Advice**

Please remember to consult NGET on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:

**Matt Verlander, Director**

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If you require any further information in respect of this letter, then please contact us.

Yours faithfully,



**Matt Verlander MRTPI**

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**For and on behalf of Avison Young**



NGET is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Developers of sites crossed or in close proximity to NGET assets should be aware that it is NGET policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

NGET's *'Guidelines for Development near pylons and high voltage overhead power lines'* promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgrid.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

NGET's statutory safety clearances are detailed in their *'Guidelines when working near National Grid Electricity Transmission assets'*, which can be downloaded here: [www.nationalgrid.com/network-and-assets/working-near-our-assets](http://www.nationalgrid.com/network-and-assets/working-near-our-assets)

#### How to contact NGET

If you require any further information in relation to the above and/or if you would like to check if NGET's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: [nationalgrid.uk@avisonyoung.com](mailto:nationalgrid.uk@avisonyoung.com)



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01 March 2024

## Buckinghamshire – Stoke Mandeville Neighbourhood Plan 2023-2028 Submission Plan

Dear Sir/Madam,

Thank you for allowing Thames Water Utilities Ltd (Thames Water) to comment upon the above.

As you will be aware, Thames Water are the statutory water supply and sewerage undertaker for the majority of Buckinghamshire and are hence a “**specific consultation body**” in accordance with the Town & Country Planning (Local Planning) Regulations 2012.

We have the following comments on the consultation in relation to our water supply and sewerage undertakings:

### **Water Efficiency**

The Environment Agency has designated the Thames Water region to be “seriously water stressed” which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change.

Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 56-014-20150327) and support the inclusion of this requirement in both Local Plan and Neighbourhood Plan Policy.

Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on the our website via the following link:  
<https://www.thameswater.co.uk/Be-water-smart>

It is our understanding that the water efficiency standards of 105 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the

Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.

Within Part G of Building Regulations, the 110 litres/person/day level can be achieved through either the 'Calculation Method' or the 'Fittings Approach' (Table 2.2). The Fittings Approach provides clear flow-rate and volume performance metrics for each water using device / fitting in new dwellings. Thames Water considers the Fittings Approach, as outlined in Table 2.2 of Part G, increases the confidence that water efficient devices will be installed in the new dwelling. Insight from our smart water metering programme shows that household built to the 110 litres/person/day level using the Calculation Method, did not achieve the intended water performance levels.

Proposed policy text:

***“Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption) using the ‘Fittings Approach’ in Table 2.2 of Part G of Building Regulations. Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met.”***

### **General Water and Wastewater Infrastructure Comments**

A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), 2023, states: *“Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...”*

Paragraph 11 states: *“Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:*

*a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects”*

Paragraph 28 relates to non-strategic policies and states: *“Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure...”*

Paragraph 26 of the revised NPPF goes on to state: *“Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary....”*

The web based National Planning Practice Guidance (NPPG) includes a section on 'water supply, wastewater and water quality' and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that *“Adequate water and*

*wastewater infrastructure is needed to support sustainable development”* (Paragraph: 001, Reference ID: 34-001-20140306).

Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the revised NPPF) to establish the following:

- The developments demand for water supply infrastructure;
- The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and
- The surface water drainage requirements and flood risk of the development both on and off site and can it be met.

Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. Details on Thames Water’s free pre planning service are available at: <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Water-and-wastewater-capacity>

In light of the above comments and Government guidance we consider that the Neighbourhood Plan should include a specific reference to the key issue of the provision of wastewater/sewerage and water supply infrastructure to service development proposed in a policy. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs). We recommend that the Neighbourhood Plan include the following policy/supporting text:

***“Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.”***

***“The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”***

### **Comments in Relation to Flood Risk and Sustainable Drainage Systems**

The National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers".

Flood risk sustainability objectives and policies should also make reference to ‘sewer flooding’ and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.

With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.



Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.

SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.

With regard to surface water drainage, Thames Water request that the following paragraph should be included in the Neighbourhood Plan ***“It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.”***

Also to mitigate flood risk both on and off-site: “surface water drainage system discharge rates should be restricted to the equivalent Greenfield Qbar runoff rate or as close as practically possible, but never greater than 2 litres per second per hectare (2l/s/Ha).” in line with CIRIA guidance.

### **Site Allocations**

There are no new allocations in the draft Neighbourhood Plan and the level of information does not enable Thames Water to make an assessment of the impact the proposed development will have on the waste water/sewerage network infrastructure and sewage treatment works. To enable us to provide more specific comments we require details of the type and scale of development together with the anticipated phasing.

We recommend Developers contact Thames Water to discuss their development proposals by using our pre app service via the following link: <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Water-and-wastewater-capacity>

It should be noted that in the event of an upgrade to our sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade. As a developer has the automatic right to connect to our sewer network under the Water Industry Act we may also request a drainage planning condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the development. This will avoid adverse environmental impacts such as sewer flooding and / or water pollution.

We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured wastewater and water supply matters for the development are being addressed.

We trust the above is satisfactory, but please do not hesitate to contact David Wilson on the above number if you have any queries.

Yours faithfully,

David Wilson  
Thames Water Property Town Planner

From: [Diane Clarke on behalf of Town Planning NWC](#)  
To: [Neighbourhood Planning Mailbox](#)  
Subject: [EXTERNAL] Bucks - Stoke Mandeville Neighbourhood Plan Network Rail comments  
Date: 29 February 2024 15:40:15  
Attachments: [image004.png](#)

Please ensure that from now on all planning applications & planning policy notifications are issued to: [TownPlanningNWC@networkrail.co.uk](mailto:TownPlanningNWC@networkrail.co.uk) ONLY

Network Rail is a statutory consultee for any planning applications within 10 metres of relevant railway land (as the Rail Infrastructure Managers for the railway, set out in Article 16 of the Development Management Procedure Order) and for any development likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway (as the Rail Network Operators, set out in Schedule 4 (J) of the Development Management Procedure Order).

Network Rail is also a statutory undertaker responsible for maintaining and operating the railway infrastructure and associated estate. It owns, operates and develops the main rail network. Network Rail aims to protect and enhance the railway infrastructure, therefore any proposed development which is in close proximity to the railway line or could potentially affect Network Rail's specific land interests will need to be carefully considered.

Regarding the comments in the consultation for the draft Stoke Mandeville Neighbourhood Plan:

*"Crossing points over the railway must be instituted for road and bike and walkers,"*

Network Rail would advise the council that any changes to existing crossing points over the railway should not be encouraged.

Where the proposal would result in an increase in the volume & a change in the character of user at a level crossing, closure of the level crossing via s257 of the T&CPA must be included within any planning consent & completed before any of the dwellings or before any business development is occupied. No new level crossings will be permitted.

Where closure of the level crossing is not possible the developer will fully fund all risk mitigation measures as required by Network Rail.

Developers/the council are strongly recommended to approach Network Rail prior to the submission of any planning application/council aspiration for new cycling/walking routes to determine the impacts of their proposal upon the existing operational railway whether for existing crossing points or for new crossings that the developer/council deems are required as a consequence of development/council aspirations. Any new bridge access across the railway would be subject to negotiation with Network Rail and fully funded by the developer.

The screenshot shows a web browser window with the URL [https://yourvoicebucks.citizenspace.com/planning/stoke-mandeville-neighbourhood-plan/user\\_uploads/stoke-mandeville-neighbourhood-plan-...](https://yourvoicebucks.citizenspace.com/planning/stoke-mandeville-neighbourhood-plan/user_uploads/stoke-mandeville-neighbourhood-plan-...). The document content is as follows:

- 17.7** Views to protect from any form of development include views from across Stoke Mandeville of the Chilterns and Coombe Hill.
- 17.8** Specific environmental concerns include the amount of litter and fly tipping within the parish. People would also like more creation of wildlife meadows and corridors and landscaping of public areas.
- Transport and Traffic**
- 17.9** Major traffic concerns include the volume and speed of traffic and the number and size of commercial vehicles passing through the Parish, with many people thinking weight restrictions on traffic would be a good idea.
- 17.10** Station flood emerged as the area generating most concerns.
- 17.11** Specific comments on transport infrastructure from the 2019 Public Consultation included:
  - "All roads around the development are suitable for the use of buses in line with a green strategy."*
  - "Think of noise, pollution."*
  - "Roads should also be straight to ensure that roadside parking does not obscure the view of the road for pedestrians."*
  - "There must be an entry and exit point, a thoroughway through the development. A single access point onto the existing road will cause major congestion."*
  - "Crossing points over the railway must be instituted for road and bike and walkers."*
  - "All developments must have pavements along every road to encourage safe walking."*
  - "Cycle routes should be established off road."*
  - "There should be neighbourhood car parking allocated to ensure that any shortfall in spaces may be managed rather than invading green spaces."*
  - "Trains and traffic are already at capacity."*
- Local Services**
- 17.12** There is a general feeling that it is important that there should always be adequate provision of school places within Stoke Mandeville to accommodate children living in the Parish since the adequate provision of school places for local Stoke Mandeville children fosters a 'Sense of Community.'
- 17.13** People find that although it is quite easy to book an appointment with a doctor, the difficulties are with long waiting times for appointments with already overstretched/overburdened surgeries.

From

Diane Clarke  
Town Planning Technician NW&C  
AssocRTPI  
Network Rail  
Email: [TownPlanningNWC@networkrail.co.uk](mailto:TownPlanningNWC@networkrail.co.uk)

Ref: GA/RW/03421/L004

12 April 2024

Stoke Mandeville Neighbourhood Plan  
Planning Policy Team  
Buckinghamshire Council  
Walton Street Offices  
Walton Street  
Aylesbury  
HP20 1UA

***By E-mail: [neighbourhoodplanning@buckinghamshire.gov.uk](mailto:neighbourhoodplanning@buckinghamshire.gov.uk)***

Dear Sir/Madam

### **Stoke Mandeville Parish Neighbourhood Plan 2023-2028 – Regulation 16 Public Consultation**

I write on behalf of our clients Manor Oak Homes (MOH) to provide our representations to the Stoke Mandeville Neighbourhood Plan. These representations are made in the context of Manor Oak Homes' interest in land at Wendover Road, Stoke Mandeville, the location and extent of which is shown on the site location plan attached at **Enclosure 1**.

#### **Background**

MOH act as promoters of land alongside the owners to secure viable planning permissions and have a successful track record in achieving planning permission for high quality and sustainable residential, commercial, retirement and mixed-use schemes. In the context of their interest in the Stoke Mandeville Neighbourhood Plan their land interests extend to some 17.8ha of land between Wendover Road along its eastern boundary and the railway line to the west. To the north is established residential development and the Stoke Mandeville Railway Station adjoining the north-west corner of the site. To the south is Chiltern View Garden Centre beyond which is the Triangle Business Park.

#### **Representations**

These representations have been prepared with regard to the parts and policies of the Neighbourhood Plan of relevance to MOH's land interests. They have been structured under relevant sub-headings to make it clear which part of the Neighbourhood Plan the comments relate to.

The Exchange | Colworth Science Park  
Sharnbrook | Bedford | MK44 1LZ  
t 01234 867135 | e [info@arplanning.co.uk](mailto:info@arplanning.co.uk) | w [www.arplanning.co.uk](http://www.arplanning.co.uk)

Armstrong Rigg Planning Ltd  
Registered in England & Wales No 08137553. Registered Address:  
The Exchange, Colworth Science Park, Sharnbrook, Bedford, MK44 1LQ.

### **Plan Period**

When we commented on the Regulation 14 stage consultation version of the Neighbourhood Plan, in August 2021, it covered a plan period from 2021-2033, coinciding with the end date of the Vale of Aylesbury Local Plan (VALP).

The front cover of the document indicates this period has now been significantly shortened to a 5 year period between 2023-2028, which we are already part way through.

The reason for such a short plan-period which does not align with the VALP is unexplained. The NPPF indicates that neighbourhood planning gives the communities the power to develop a shared vision for their area<sup>1</sup>, while the NPPG explains that Neighbourhood Planning can be used to set out a positive vision for how they want the community to develop over the next 10, 15, 20 years in a way that meet identified needs and make sense for local people.<sup>2</sup>

To meet national policy and guidance on presenting a positive vision for the area it is considered the plan period should be extended. To retain the current plan-period would indicate that the document would have an unusually short shelf life and/or require early review. This could prove unduly onerous given that the NP indicates at paragraph 19.13 that it has taken over seven years to reach this stage.

### **Foreword (NP, page 4)**

This section of the NP indicates that the main impetus and objective of the document is to prevent development on sites beyond those strategic sites allocated in the VALP and in respect of those allocations seek to cut across these and introduce more onerous requirements (such as those specified at paragraphs 1.5 and 1.6) which do not feature in the same form in VALP strategic policies D-AGT1 and D-AGT2.

In this regard the NP fails to support and undermines the delivery of these well-established VALP strategic policies, contrary to paragraphs 13 and 29 of the NPPF. Neither is the NP considered to offer a positive vision to guide future development which will contribute to the achievement of sustainable development. It is out of step with strategic policies and national policies and advice contained in the NPPF and NPPG respectively and is therefore contrary to the basic conditions (a, d and e).

### **Planning Policy Context (NP, pages 10-13)**

The NP makes repeated references to sections from the NPPF (2021). This has been replaced by the latest version published in December 2023. The references should be checked and updated accordingly.

### **Key Issues for Residents (NP, pages 16 & 17)**

This section of the NP seeks to summarise issues of key concern to residents. Notably it highlights that a significant proportion of residents believe there should be affordable housing in the Parish for local people with a connection to the area.<sup>3</sup> It also indicates new business development should be encouraged.<sup>4</sup>

The failure to allocate sites to meet these needs and indeed imposing limits beyond those of the adopted VALP, including the introduction of restrictive policies (commented on below) run counter to offering the positive vision needed to achieve these objectives.

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<sup>1</sup> NPPF, paragraph 29

<sup>2</sup> NPPG, Ref ID: 41-003

<sup>3</sup> Stoke Mandeville NP, paragraph 17.3

<sup>4</sup> Stoke Mandeville NP, paragraph 17.15

### **Vision and Objectives (NP, pages 18 & 19)**

This section of the NP sets out some objectives. It purports to explain how the NP will help to achieve these, but it is unclear in practice how this is to be achieved and in some cases will frustrate rather than support well established strategic policy objectives. In particular we draw attention to the following:

The reference to the NPPF in paragraph 18.4 and its reference to green infrastructure and housing allocations is misplaced.

References in the same paragraph to protecting loss of rural vistas to housing developments and preventing any further loss to development of rural and other green spaces are unduly negatively framed, are inconsistent with national policy, strategic policies of the VALP and could undermine them, contrary to the basic conditions.

At paragraphs 18.7 and 18.8 the NP indicates that it will require development plans to provide for medical care, schools, sports and leisure communities (paragraph 18.7) and support business development (18.8). No positive vision or means by which the NP will achieve these objectives, in the absence of allocations, is offered.

At paragraph 18.10 it is maintained that the NP will be monitored by Buckinghamshire Council and the Parish Council using data collected in planning monitoring reports and the Parish may, if necessary, undertake a formal review before the end of the plan period, although it is not expected that any such review would take place during the first half of the Plan Period.

It is questioned whether either Buckinghamshire Council or the Parish Council have adequate resources to monitor the plan and in turn whether the Parish would be able to undertake a review of the NP before the end of the plan period. As explained above in our comments on the plan period the end of the proposed plan period 2028 is only 4years away at the time of writing and the NP acknowledges at paragraph 19.13 it has taken over 7years to reach this stage.

Committing to monitoring and review of the NP in such a short time period appears unrealistic.

### **GI1 – Local Green Spaces**

#### **Local Green Spaces Policy (NP, page 23)**

Local Green Space designation conveys the same policy restrictions on land as that of Green Belt and accordingly national policy and guidance applies a high threshold to their designation. In particular:

- Blanket designation of countryside adjacent to settlements will not be appropriate. It should not be used as a back door way of trying to achieve what would amount to a new area of Green Belt by another name.<sup>5</sup>
- It must be demonstrably special to a local community and hold a particular significance.<sup>6</sup>
- Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services.<sup>7</sup>

The policy seeks to designate a plethora of incidental green spaces, some at the edge of new housing development, which are likely to be protected by planning obligations and or planning conditions and which are not considered to satisfy national policy requirements to justify their designation. Of the areas listed only the sites numbered 5: Bucks CC Sports and Social Club; 9: QE2 Recreation Ground and 13: Lower Road, The Village (burial ground and allotments) are considered likely to meet the requirements for designation.

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<sup>5</sup> NPPG Ref ID: 37-015

<sup>6</sup> NPPF, paragraph 102

<sup>7</sup> NPPF, paragraph 101

## GI2 – The Green Buffer

### Green Buffer Policy (NP, page 25)

The wording of the policy cuts across and is more onerous and restrictive than the well established strategic policies of the VALP (D-AGT1 and D-AGT2). These policies were adopted in September 2021 and will rightly be used and relied upon by landowners and developers of the affected sites as the appropriate reference point for conducting viability assessments and long-term master planning.

To introduce more restrictive policies which serve to undermine the strategic policies of the VALP, several years after its adoption, runs contrary to national policy, which in the NPPF advises in respect of strategic policies<sup>8</sup>, that:

*Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; **and should shape and direct development that is outside of these strategic policies.***<sup>9</sup> *Emphasis added*

*Neighbourhood plans should not promote less development than set out in strategic policies for the area, or undermine those strategic policies.*<sup>10</sup>

*Neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area.*<sup>11</sup>

The policy as worded is contrary to national policy. It proposes to introduce more restrictive provisions to well-established strategic policies for the VALP (D-AGT1 and D-AGT2) which in any case impose site specific requirements to guide the future development of the affected sites. The policy should be omitted.

## GI3 – The Settlement Boundary

### Settlement Boundary Policy (NP, page 27)

The introduction of a settlement boundary which proposes to 'prevent development on greenfield land outside areas already allocated for housing in the Adopted Vale of Aylesbury Local Plan 2013-2033,' is not considered necessary given the spatial strategy provided by VALP.

Furthermore it imposes greater restrictions limiting forms of development which national policy and strategic policy of the VALP positively support, i.e the delivery of renewable energy NPPF chapter 14 and VALP strategic policy C3 and forms of housing which national policy (NPPF, paragraphs 73, 82 and 84) and VALP policy (planning policy H2) support.

The policy is not considered to be positively prepared to support sustainable development, nor is it in accordance with national and strategic policies contained in the development plan. As such it fails to meet basic conditions a, d and e.

It is also notable that proposing such a restrictive policy serves to frustrate the delivery of development needs identified elsewhere in the NP. These are considered in more detail later in this letter but include: provision of sport and leisure facilities (CF3); improved transport links and crossing facilities (TT1 & TT2); business development (BD1).

In the event the policy is proposed to be retained it should at least be re-worded to bring it in line with national and development plan policy, as follows (deletions shown ~~struck through~~ and additions in **bold**):

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<sup>8</sup> VALP, identifies strategic policies at paragraph 1.24, including all those in chapters 3 and 4 of the VALP

<sup>9</sup> NPPF, paragraph 13

<sup>10</sup> NPPF, paragraph 29

<sup>11</sup> NPPF, footnote 16

*The Neighbourhood Plan defines a Settlement Boundary for Stoke Mandeville. ~~Parish to prevent development on greenfield land outside areas already allocated for housing in the Adopted Vale of Aylesbury Local Plan 2013-2033.~~*

*Proposals for development within the defined settlement boundary will be supported, provided they accord with the other relevant policies of the development plan, including this Neighbourhood Plan. ~~There is a presumption against~~*

***Development of land outside the settlement boundary will only be supported where there are policies in the VALP which permit such development, and/or they accord with the NPPF (December 2023).***~~new homes outside the Settlement Boundary.~~

### **CF1 – Educational Facilities**

#### **Education Facilities Policy (NP, page 30)**

The wording of this policy would prevent the sale of any housing before schools necessary to support its provision are completed and open. There is no recognition that the delivery of schools may not be in the control of the housing developer and that they would necessarily be subject to planning obligations with triggers to time delivery to coincide with projected need.

CIL Regulations and national policy (NPPF, paragraph 57) provide the necessary tests which planning obligations governing matters such as education provision must satisfy. This policy goes beyond these tests, is unreasonable, unfair and unnecessary and should be omitted.

### **CF2 – Medical and Pharmaceutical Facilities**

#### **Medical and Pharmaceutical Facilities Policy (NP, page 31)**

The policy as worded encouraging provision of medical facilities on a Parish wide basis is incompatible with the wording of GI3.

In the event the NP wants to encourage the delivery of such provision it should allocate development sites for its provision.

### **CF3 – Sports and Leisure Facilities**

#### **Sports and Leisure Facilities Policy (NP, page 32)**

The policy as worded encouraging provision of sports and leisure facilities on a Parish wide basis is incompatible with the wording of GI3.

In the event the NP wants to encourage the delivery of such provision it should allocate development sites for its provision.

### **TT1 – Active Travel**

#### **Active Travel Policy (NP, page 35)**

### **TT2 – Traffic Congestion**

#### **Traffic Congestion Policy (NP, page 37)**

These policies seek improvements to transport links to a range of locations, including Stoke Mandeville Railway Station, Chiltern View Nursery, Triangle Business Park and crossings over Wendover Road.

In the event the NP wants to facilitate the delivery of such provision it should allocate development sites, such as our clients land which connects Triangle Business Park and Chiltern View Nursery to the south with Wendover Road along the eastern boundary and Stoke Mandeville Railway Station in the north-west corner. As explained in representations we submitted at the Regulation 14 stage on behalf of MOH their land is uniquely capable of delivering these improvements.



## **BD1 – Business Development**

### **Business Development Policy (NP, page 40)**

This policy is supportive of business development, retail space, pedestrian and cycle access and car parking.

Given the restrictive nature of policy GI3 and in the absence of allocations the NP lacks a realistic means to achieve, support and positively guide such provision.

In our representations to the Regulation 14 consultation version of the NP we drew attention to the way in which our clients land to the east of the railway line and west of Wendover Road can deliver many of the objectives of the NP as expressed through the aforementioned policies CF2, CF3, TT1, TT2, BD1.

We therefore advocated the inclusion of an additional positively worded policy and allocation of our clients land which can provide a means by which these objectives can be realized.

Since we made comments to the Regulation 14 version NP in 2021 a new planning issue has impacted on this part of Buckinghamshire and on neighbouring authorities.

This part of Buckinghamshire now falls within the 12.6km Zone of Influence (ZoI) of the Chiltern Beechwoods Special Area of Conservation (SAC). Housing within the ZoI can only be granted planning permission when supported by suitable Sustainable Alternative Natural Greenspace (SANG) capable of mitigating the recreational disturbance effects of the additional housing on the protected SAC.

At the time of writing no SANG capable of mitigating the effects of new housing development has been secured in Buckinghamshire, yet this important matter fails to get a mention in the NP.

Our clients land is large enough to provide a SANG suitable for mitigating the effects of local future housing growth.

In order to provide a realistic means of achieving the development aims of the NP and provide for SANG in a way which will support sustainable housing growth in the wider area we advocate the inclusion of a positively worded policy capable of providing for these important future needs. The recommended wording is as follows:

#### ***Policy XXX***

***Development of land at site allocation xx between Wendover Road and the railway line which provides for:***

- ***Employment and business uses***
- ***Residential retirement homes/care homes***
- ***Sports and leisure facilities***
- ***Local medical facilities***
- ***Sustainable Alternative Natural Greenspace (SANG) to mitigate recreational disturbance impacts on the Chiltern Beechwoods Special Area of Conservation (SAC)***
- ***Non-vehicular sustainable routes, including a link between Stoke Mandeville station and Triangle Business Park***
- ***Improved pedestrian crossing facilities over Wendover Road***

***Will be supported in principle. Proposals will be expected to be brought forward in accordance an overarching masterplan to demonstrate how these elements will be delivered and phased.***

## **Summary and Conclusions**

Thank you for the opportunity to comment on this submission stage Neighbourhood Plan. Comments made are intended to be constructive and aid the Neighbourhood Plan to achieve its stated aspirations.

The recommended changes are required to ensure the NP satisfies the basic conditions. We would be pleased to engage further in this process and discuss any element of this response with representations of the Neighbourhood Plan group or Buckinghamshire Council.

I trust that the content of this letter is clear. In the event you should have any queries or require any additional information please do not hesitate to contact either myself or my colleague Roger Welchman.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Geoff Armstrong', written in a cursive style.

Geoff Armstrong ([geoff.armstrong@arplanning.co.uk](mailto:geoff.armstrong@arplanning.co.uk))

**Director**

**Armstrong Rigg Planning**

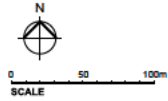
Direct Line: 01234 867130

Mobile: 07710 883907

**Enclosures**

Enclosure 1 – Site Location Plan

**ENCLOSURE 1**  
**SITE LOCATON PLAN**



PLANNING APPLICATION BOUNDARY



Architects · Project Managers · Quantity Surveyors  
 130 New Walk  
 Leicester, LE1 7JA  
 Tel: 0116 204 5800, Fax: 0116 204 5801  
 email: design@rg-p.co.uk, www.rg-p.co.uk

**Project:** A development at Wendover Road,  
 Stoke Mandeville

**Client:** Manor Oak Homes

**Sheet title:** Site Location Plan

**Ref:** 40824/ 001

**Scale:** 1:2500 @ A2

**Date:** November 2016

**Drawn:** AJT

**Checked:** RAW

All dimensions to be checked on site. Do not scale off drawing. This drawing is the copyright of the Architect, and not to be reproduced without their permission. Ordnance Survey map information reproduced with permission of HMSSO Crown Copyright reserved. rg-p Ltd. Trading as rg-p.

To whom it may concern,

I write as the director and managing partner of the Stoke House Farm Partnership regarding the recent communication received, calling for local residents to comment on the Neighbourhood Plan for Stoke Mandeville.

We seek to amend the south-eastern boundary of the Parish Settlement Boundary to include the parcel shaded red on the enclosed plan.

The parcel includes two cottages and an area of pasture. The cottages are nearing the end of their useful life and we have concerns that the current policy GI13 would prevent us from replacing these dwellings in the medium to long term.

Given that the construction of HS2 creates a new definitive boundary, which is not accounted for with the Neighbourhood Plan currently, we do not consider the inclusion of this parcel would have any detriment to the policy aims and objectives of the Neighbourhood Plan, nor will it have any conflict with VALP policies.

I look forward to hearing from you in due course,

Yours sincerely,

Debbie Obied

*Stoke House Farm  
Risborough Rd  
Stoke Mandeville  
Bucks HP22 5UP*



We are in support of the neighbourhood plan especially the green buffer as we will have new properties backing on to us after 21 years of having green open space.

Living on a very busy main road we have enjoyed being able to walk from our garden into the fields away from the pollution.

We are very much aware new properties need to be made available for our over growing population but we do also ask you consider existing property owners too.

Please ensure the infrastructure is also available in readiness prior to selling new properties.

Michelle & Richard Dover

---

I support the plan

Chris dainty

---

I agree with the proposed plan as it stands. We do need the green spaces in the plan and a buffer as proposed and to have an agreed boundary to preserve Stoke Mandeville as a separate village.

Linda Brown

---

I am sending this email to give my support for the Stoke Mandeville Neighbourhood Plan.

Martin Steward 

Regards,  
Martin

---

Hello

I am a resident for the last 8 years in Stoke Mandeville ,and wish to comment on the Neighbourhood Plan that has just been published.

My details are as follows

Barry Maskell



I am generally in support of the Stoke Mandeville Neighbourhood Plan, and believe that it reflects the best interest of the residents.

I accept that development of the area is needed, but it must be controlled.

So this plan is necessary.

There are a number of points in the plan which I am particularly keen to have acknowledged, and acted on, as follows.

1 TRAFFIC Station Road is very dangerous. Fast moving (speeding) heavy traffic and construction lorries together with the very narrow footways means pedestrians and cyclists are fearful when using it because they are so close to these vehicles. This occurs in particular to the railway bridge.

I see reference to a cycle lane in the plan but believe there is no room for one on this Road.

I regularly cycle and walk along the road and therefore speak from experience, This needs addressing urgently.

2 The increasing population in the area has already overloaded public services,such as Doctors,dentists,schools,police.

There needs to be a positive plan to increase these facilities, in conjunction with the Developers contributing toward the cost of these facilities.

3 I am concerned that the Buses that serve the Village will be rerouted when the new Village bypass is completed.

It appears that the Village may be isolated from new routes,which would be detrimental for many local bus users.

I trust my comments and general agreement with the plan,will be noted.

Please keep me informed on future progress via e-mail to [REDACTED]).

Many thanks

Barry Maskell.



What is your full name? - Name	Please indicate whether you support or object to the submitted Neighbourhood Plan. - Support/Object	Please provide your comments, suggested changes or reasons for objecting. - Comments
Paul Walter	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Maureen Reeves	I support the submitted Neighbourhood Plan and would like to provide comments or suggest changes	<p>Stoke Mandeville Allotments.</p> <p>There are two mentions of the allotments in the plan one under section GI1 Local Green Space and secondly under Community Facility Policies. It is the second item I wish to be changed. At the present time the allotments are listed item 24.15 which states the PC owns the land behind the school.. which has been used as allotments for many years. It then goes on to refer to the Adopted Vale of Aylesbury plan in connection with additional educational capacity and health.</p> <p>This surly is linked to item 24.11 and 24.12 above and has no connection to the Allotment land which has already been designated as a Local Green Space.</p> <p>I would suggest that item 24.15 should state that "The Parish Council owns a parcel of land behind the school.. which has provided allotments for many years and is well used by residence with a waiting list.</p> <p>Maureen Reeves Allotment Holder.</p>
Debbie Obied	I support the submitted Neighbourhood Plan and would like to provide comments or suggest changes	<p>Stoke House Farm Partnership seeks to amend the south-eastern boundary of the Parish Settlement Boundary to include the parcel shaded red on the associated plan sent to <a href="mailto:neighbourhoodplanning@buckinghamshire.gov.uk">neighbourhoodplanning@buckinghamshire.gov.uk</a></p> <p>The parcel includes two cottages and an area of pasture. The cottages are nearing the end of their useful life and we have concerns that the current policy GI13 would prevent us from replacing these dwellings in the medium to long term.</p> <p>Given that the construction of HS2 creates a new definitive boundary, which is not accounted for with the Neighbourhood Plan currently, we do not consider the inclusion of this parcel would have any detriment to the policy aims and objectives of the Neighbourhood Plan, nor will it have any conflict with VALP policies.</p>
Kirsty Shanahan	I support the submitted Neighbourhood Plan but do not wish to make any	Not Answered

What is your full name? - Name	Please indicate whether you support or object to the submitted Neighbourhood Plan. - Support/Object	Please provide your comments, suggested changes or reasons for objecting. - Comments
	comments or suggest changes	
James E	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Susan Staff	I support the submitted Neighbourhood Plan and would like to provide comments or suggest changes	I support the neighbourhood plan. I am one of the very few residents who will be immediately impacted by the huge housing development on the land owned by (or originally purchased by) Lands Improvement. During negotiations with them there was very serious discussion and some significant buy-in for the concept of a community orchard to be planted behind our homes, between these and the new development. This is something that I think would benefit all parties and, critically, the environment. We have lost far too much of our natural world recently in terms of hedgerows, trees and open green spaces. I am very pleased to read the concept of the 20m green buffer space and would welcome anything that might make that wider and wrap around (I am the end house (8 Lower Road). This is especially relevant for those houses at my end, which, by the nature of the land, are elevated. The larger the green space the less exposed the inside of our homes will be.
Julia Mackintosh	I support the submitted Neighbourhood Plan and would like to provide comments or suggest changes	The traffic congestion around Stoke Mandeville is an utter disgrace. We have lived here for nearly 20 years but are now considering moving. We feel completely hemmed in and it takes a very long time to cover a short distance. We have HS2 smashing through our village with nothing positive to add for residents except years of disruption. We are no longer a village or community but a forgotten outlier of Aylesbury. The county town is an embarrassment. You can't drive anywhere easily and apart great grammar school education there is nothing to attract new people here. Building companies get permission to build but are not made to take any responsibility for the supporting infrastructure the growing population requires. Whilst I also support the great work the Parish Council do on our behalf it feels like we are shouting into a vacuum. All words and plans but nothing tangibly positive for SM residents.
Ana King	I support the submitted Neighbourhood Plan but do not wish to make any	Not Answered

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	comments or suggest changes	
Jennifer Shaw	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Brian Thomas McGinnity	I support the submitted Neighbourhood Plan and would like to provide comments or suggest changes	<p>The Plan is well-organised and presented. It makes an appropriate distinction between the policies and their supporting text. It includes a series of good maps. It is clear that significant time and resources were invested in the plan preparation process. In particular significant effort and energy has been made in consultations with the residents of Stoke Mandeville (SM) Parish in identifying the issues and objectives that we wish to be included in the Plan. It is a good example of the localism agenda in practice. The Plan is evidently underpinned by community support and engagement.</p> <p>In particular, I welcome and strongly support the following Policies which attempt to mitigate the loss of rural and green spaces as a result of the significant ongoing housing development on agricultural land in the Parish and provide a framework in which the SM can maintain its character and appearance:</p> <p>a) Green Buffer Policy - Section 22.1. This Policy will require development proposals to include the provision of a green buffer between new developments and the existing Stoke Mandeville settlement in accordance with the requirements of the adopted Vale of Aylesbury Local Plan. The green buffer will prevent the complete coalescence of SM and South Aylesbury and maintain as far is possible the semi-rural heritage of SM. It provides privacy and mitigates the loss of amenity for existing SM residents, as required by the National Planning Policy Framework. This policy also ameliorates some of the impact on existing SM residents of having their rural views replaced by housing estates.</p> <p>b) Local Green Spaces Policy - Section 21.1. This Policy designates 15 Local Green Spaces that are demonstrably special to the local community of the Parish. It will ensure that there is at least some preservation of public amenity in terms of designating and protecting specific green spaces, providing places for people to walk and exercise.</p>

What is your full name? - Name	Please indicate whether you support or object to the submitted Neighbourhood Plan. - Support/Object	Please provide your comments, suggested changes or reasons for objecting. - Comments
		<p>It is clear to me that the implementation of the Plan will be a useful addition to the local planning process for the years ahead and supports the aspiration for SM to maintain its character and appearance despite the significant ongoing housing development on agricultural land in the Parish.</p>
Ben Farrow	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Katharine Jackson	I object to the submitted Neighbourhood Plan and will provide comments to explain my reasons	<p>We have many many meetings in relation to this planning application and each time all of our concerns and objections have been totally ignored. The field behind all of our properties has always been designated as 100% green belt land and should NOT be built upon. We have been told by our parish council that this building will go ahead regardless of what the residents think and any objections will be ignored. According to the application there WILL be a green buffer of some 20mtrs between existing properties and any of the new buildings. As the existing</p>

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		infrastructure cannot cope with current work load, therefore the roads must be upgraded before any ground works take place on the new builds.
Mrs C Taylor	I object to the submitted Neighbourhood Plan and will provide comments to explain my reasons	This area of green was used for sports & leisure it is a much needed space for our health & well being. There is no other leisure facility in the area. Children have to play in the street while this area remains fenced off. The club house is a much needed social meeting place many clubs used the hall for activities eg badminton, keep fit, children's activities, parties even a wedding venue, christmas parties etc. While the outside spaces had tennis courts, cricket practice nets, football pitches that are much needed in this area, archery club, rounders. If we loose this green recreational space it will be gone forever with all the houses planned for the surrounding area it will be a much needed green space.
Jemma Summers	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Wendy Sutherland	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Tom Kerr	I support the submitted Neighbourhood Plan and would like to provide comments or suggest changes	I would like to see the green buffers in Stokemandevulle to be at least 25 meters width



What is your full name? - Name	Please indicate whether you support or object to the submitted Neighbourhood Plan. - Support/Object	Please provide your comments, suggested changes or reasons for objecting. - Comments
Michael Glenister	I support the submitted Neighbourhood Plan and would like to provide comments or suggest changes	<p>I broadly support the principles set out in the document.</p> <p>I strongly support Policy GI2 and note that the current planning proposals submitted for housing to the rear of Petersfield and Castlefields do not meet the conditions set out under Green Buffer Policy GI2.</p>
Chris Gilbert	I support the submitted Neighbourhood Plan and would like to provide comments or suggest changes	SBHPC are in full support of the vision laid out in the neighbourhood plan for Stoke Mandeville and would like to offer our congratulations to all involved in the research and publication of such a comprehensive document.
Anthony James Barrows	I support the submitted Neighbourhood Plan and would like to provide comments or suggest changes	<p>The Playing Fields at the Bucks Sports and Social Club need to be kept as playing fields /green space for the benefit of the community, both existing and future</p> <p>The current level of development (housing estate, relief roads, HS2) has resulted in a huge removal of, and access to, green spaces, due to footpath closures and diversions</p> <p>Children, adults, families all need access to green space to destress and enjoy themselves</p> <p>Why should they be forced to drive a couple of miles when green space already exists at the Bucks Sports and Social Club, adding to traffic congestion and pollution</p> <p>By selling off this vital area of green space, Bucks CC will be ill serving the inhabitants of Stoke Mandeville.</p> <p>Please keep our Playing Fields!</p>
Asad Mahmood	I support the submitted Neighbourhood Plan and would like to provide comments or suggest changes	I am a resident of Stoke Mandeville and whilst I would want to preserve every part of our current countryside, I recognize that this is no longer possible. Facing this sad reality, we need a Neighborhood that delivers for the needs of our community and I feel that this current plan does. I am especially keen to see a buffer zone between existing and new developments to ensure that there is no urban sprawl and the unique identity of the current properties is retained. There must be no compromises on this.
Amanda Jane Clifford	I support the submitted Neighbourhood Plan and would like to provide comments or suggest changes	I fully support the proposal for a settlement boundary G13 protecting the open space and views of the Chiltern Hills. This is important for the local community and very important to us as a family living in the parish with open countryside to walk in. It is also very important to maintain a sense of a village community with open space buffers rather than being fully absorbed into Aylesbury town.

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Ian Radcliffe	I support the submitted Neighbourhood Plan and would like to provide comments or suggest changes	I feel the plan could go further in its commitment towards active travel in ensuring there are appropriate cycle paths and pavements to encourage people to walk and cycle and move away from being dependent on cars. I think the plan could go further in its commitment to protecting the green spaces around the village and while the green buffer between the village and AGT1 is set by the avdc plan more protection could be in place on the south and east sides of the village.
Richard Dawson	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Lesley Roberts	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Susan Rooke	I object to the submitted Neighbourhood Plan and will provide comments to explain my reasons	I object to farmland and areas that support local wildlife being turned into housing estates. There are not enough green spaces in the plan.

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Graham Owen	I support the submitted Neighbourhood Plan and would like to provide comments or suggest changes	<p>The Plan makes an appropriate distinction between the policies and their supporting text. It is clear that time and resources were invested in the plan's preparation process. The Plan is underpinned by community support and engagement.</p> <p>I welcome and support the following Policies which attempts to mitigate the loss of rural and green spaces as a result of the significant ongoing housing development on agricultural land in the Parish and provide a framework in which the SM can maintain its character and appearance:</p> <p>a) Green Buffer Policy - Section 22.1. This Policy will require development proposals to include the provision of a green buffer between new developments of a minimum of twenty metres and the existing Stoke Mandeville settlement in accordance with the requirements of the adopted Vale of Aylesbury Local Plan. The green buffer will prevent the complete coalescence of SM and South Aylesbury and maintain as far is possible the semi-rural heritage of SM. It provides privacy and mitigates the loss of amenity for existing SM residents, as required by the National Planning Policy Framework. This policy also ameliorates some of the impact on existing SM residents of having their rural views replaced by housing estates.</p> <p>b) Local Green Spaces Policy - Section 21.1. This Policy designates 15 Local Green Spaces that are demonstrably special to the local community of the Parish. It will ensure that there is at least some preservation of public amenity in terms of designating and protecting specific green spaces, providing places for people to walk and exercise.</p> <p>It is clear to me that the implementation of the Plan will be a useful addition to the local planning process for the years ahead and supports the aspiration for SM to maintain its character and appearance despite the significant ongoing housing development on agricultural land in the Parish.</p>

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Nicholas Brown	I support the submitted Neighbourhood Plan and would like to provide comments or suggest changes	<p>I wouldn't consider most of the areas described as Green Spaces in the plan to be true green spaces. Most could only be described as natural boundaries, too small for development or alternative use anyhow. Although all of these patches of greenery need to be protected, the Parish council should be looking ahead to protecting the true green spaces that will be emerging with the implementation of HS2, the SEALR and especially the SM bypass. There will inevitably be developers eager to infill the gaps between HS2 and the Eastern side of Station Road between the Risborough Road and Wendover roads, all of the land comprising of the former pig research centre within which sits the Fremantle care home on Risborough Road and glaringly obviously the fields along Marsh Lane surrounding and opposite what will become the new burial ground. I can see a strong argument for limited and appropriate redevelopment of the brown field site that was the former pig research centre which is in fact currently owned by the Land Link development company but if this becomes extensive housing then every effort must be made to prevent infill from this area, along what will be the new A4010 bypass at the back of The Goat Centre commercial area, all the way towards the new Mandeville Park Estate.</p> <p>I also feel that the Parish Council should be much more proactive in fighting to keep the existing footpaths and bridleways south of the village open for use. I appreciate that we have lost the majority of these for good with HS2 but every available option should be pursued for developing a network of public footpaths/cycle routes South East of the village to allow access towards the Chilterns/Kimbles/Bishopstone and potentially from the Woolpack pub, along the back of the houses on Station/Hampden Roads down to the cycle path paralleling the Wendover Road. Station Road is not suitable in any way for a retrofitted cycle path to join together the existing cycle routes between the Lower and Wendover Roads.</p>
Peter Rayner	I support the submitted Neighbourhood Plan and would like to provide comments or suggest changes	<p>I support the whole plan but would like to highlight several policies where I have the strongest support.</p> <p>I very strongly support policy GI2 - The Green Buffer. A green buffer between the existing settlement and new development was specified in the VALP but there was no clear map. The map in the Neighbourhood Plan shows the green buffer where I believe it should be.</p> <p>I strongly support the green infrastructure policy GI1 - Local Green Spaces as it is important to preserve these to prevent increasing the density of housing and continue to provide a public amenity.</p> <p>I also strongly support the 3 community facility policies CF1, CF2 and CF3 as it is important that new medical,</p>

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		educational and sports facilities are provided for the large number of new residents if the planned housing developments go ahead.
Laurence Prestage	I support the submitted Neighbourhood Plan and would like to provide comments or suggest changes	The Stoke Mandeville Neighbourhood Plan protects the valuable green spaces in Stoke Mandeville, and also protects the last areas of countryside to the south and west of the parish. It also includes policies for dealing with traffic congestion and public transport - these policies are essential given the huge increase in population in AGT1 and AGT2 that the Parish is having to absorb in the next few years. In Stoke Mandeville Village there are some significant heritage assets that date back more than a century which must be preserved for future generations and these are protected in the Preservation Policy in the Neighbourhood Plan.
Wendy Prestage	I support the submitted Neighbourhood Plan and would like to provide comments or suggest changes	The Stoke Mandeville Neighbourhood Plan protects the valuable green spaces in Stoke Mandeville, and also protects the last areas of countryside to the south and west of the parish which I feel is really important if Stoke Mandeville is to retain some countryside and not become just a suburb of Aylesbury. The policies on traffic congestion is important because we are expected to take 100's of new residents in the coming years and will have to deal with a massive increase of vehicles on roads that are already really busy.
Neil Knowlton	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered



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Angela Knowlton	I support the submitted Neighbourhood Plan and would like to provide comments or suggest changes	I think it is vital to protect green spaces, as there is yet further pressure from developers on fields to the south of the village. So many local rural walks from the village have been destroyed by ring road work, housing developments and hs2 that to enjoy a walk often requires a car journey. Those walks and green spaces left MuST be preserved. In addition traffic issues in the village are extremely frustrating and on occasion it's taken me 30 minutes to get out of the village centre on my daily commute. Once again the preservation of green spaces & no additional housing within the parish are necessary to avoid any additional congestion.
Edwin Robert Kendrick	I support the submitted Neighbourhood Plan and would like to provide comments or suggest changes	I think that the former Bucks CC Sports & Social Club Playing Field should be preserved as a green space and I strongly support the Parish Council's efforts to acquire the field and former clubhouse for community use.
Mark Clifford	I support the submitted Neighbourhood Plan and would like to provide comments or suggest changes	I would like to add my full support and backing of the neighbourhood plan, what is very important to myself and my family, living in the parish is the settlement boundary that has been identified in this plan. I feel this is a very important factor. One of the reasons we chose to live in the parish is the open countryside and views of the Chilterns, the rural nature of the parish is vital to us and the walks we can take in the open countryside, which contributes to our health and wellbeing.
Barry Clarke	I support the submitted Neighbourhood Plan and would like to provide comments or suggest changes	I fully understand the needs for further housing however it is so important we keep the rural feel of Stoke Mandeville rather than being consumed by Aylesbury. The areas outside the permitted boundaries for further development must be respected for the biodiversity of wildlife and well being of residents within the parish. There will not be many many green rural spaces left and these must be saved
Stephen Woollard	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Wendy Woollard	I support the submitted Neighbourhood Plan but do not wish to make any	Not Answered

What is your full name? - Name	Please indicate whether you support or object to the submitted Neighbourhood Plan. - Support/Object	Please provide your comments, suggested changes or reasons for objecting. - Comments
	comments or suggest changes	
Elizabeth Tice	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered

<p>Robert Sawers</p>	<p>I object to the submitted Neighbourhood Plan and will provide comments to explain my reasons</p>	<p>1. The LTP states the following "All new development must provide appropriate on- and off-site infrastructure (in accordance with the Infrastructure Delivery Plan) in order to: Vale of Aylesbury Local Plan 49 a. avoid placing additional burden on the existing community b. avoid or mitigate adverse social, economic and environmental impacts and c. make good the loss or damage of social, economic and environmental assets. In planning for new development, appropriate regard will be given to existing deficiencies in services and infrastructure provision. Development proposals must demonstrate that these have been taken into account when determining the infrastructure requirements for the new development. Development proposals must provide sufficient bin storage. The provision of infrastructure should be linked directly to the phasing of development to ensure that infrastructure is provided in a timely and comprehensive manner to support new development." I do not believe that the development planned meets the above requirements.</p> <p>2, The plan continues with the following " As a new 'Garden Town' Aylesbury will be a focus for: new infrastructure, including health, education and community infrastructure, open space and recreation, and emergency and public services." The planned development will not deliver any of the above and in fact will cause a detrimental effect on air quality, natural habitat for birds and wildlife and add to an already congested road infrastructure with the addition of 1000 vehicles.</p> <p>3. Quality Standard</p> <ol style="list-style-type: none"> <li>1. Contribute to the management, conservation and improvement of the landscape</li> <li>2. Contribute to the protection, conservation and management of historic landscapes, archaeological and built heritage assets</li> <li>3. Maintain and enhance biodiversity and ensure that development and its implementation results in a net gain of biodiversity as identified in Biodiversity Action Plan habitats and species plans</li> <li>4. Deliver the enhancement of existing woodlands and create new woodlands and tree features</li> <li>5. Create new recreational facilities, particularly those that present opportunities to link urban and countryside areas</li> <li>6. Take account of and integrate with natural processes and systems</li> <li>7. Be managed to provide cost-effective and multi-functional delivery and funded in urban areas to accommodate nature, wildlife, historic and cultural assets, economic benefits and provide for sport and recreation activities</li> <li>8. Designed to high standards of sustainability to deliver social, economic and environmental benefits</li> </ol> <p>I would argue that the proposed development does not deliver the quality standard expected from the LTP particularly points 1,2,3,4,5,7 and 8. Given that I question the ESG policy of the council.</p>
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What is your full name? - Name	Please indicate whether you support or object to the submitted Neighbourhood Plan. - Support/Object	Please provide your comments, suggested changes or reasons for objecting. - Comments
Jenna Mitchell	I support the submitted Neighbourhood Plan and would like to provide comments or suggest changes	<p>Significant consideration needs to be had over not just schooling, doctors and pharmacies but also the hospital and police. The hospital currently (as the NHS as a whole) cannot cope its demand as they closed Wycombe. But more housing will bring an increase in demand on an already breaking system.</p> <p>The police service again is also working on a fractured and under resourced system more investment needs to be had here also, they cannot cope with the current demand.</p> <p>Station Road congestion needs to seriously addressed. Traffic as a whole in the town at the moment is a joke, not withstanding more cars on crumbling roads.</p> <p>I support and do not approve of any permitted buildings south of the village, our views and peace are already being destroyed by the installation of the HS2.</p> <p>I agree schooling needs to be a priority, we have lived in the village for over 14 years and both my children have to go to Bedgrove due to the village school being too small for the ever increasing younger families in the area. We need our own health facilities and a rival store to the pot office which is often over priced.</p> <p>We need to stay as a separate village and not be grouped together with the town - the identity is what keeps us unique and sort after. Group us it's Aylesbury and house price will fall, and we will just be another borough of London, which is basically what Aylesbury town is turning into.</p>

<p>GRAHAM WILLIAM STEWART</p>	<p>I object to the submitted Neighbourhood Plan and will provide comments to explain my reasons</p>	<p>I have thought long and hard before objecting to the NP as it stands. It's nearly there, but there are just too many flaws and omissions to support it. If these are addressed, or reasons provided as to why not, I would be happy to support it.</p> <p>In passing, my husband tells me that the councillor who chairs the NP Steering Group has been encouraging residents (both in public meetings and privately) only to submit comments to this forum if they are positive. Naughty!</p> <p>Some general comments first: The NP as a whole represents a significant scaling back of the previous proposals. While those were arguably over-ambitious, I think many looking at this NP will want a clearer explanation of the reasons for those changes, rather than having them tucked away in supplementary documents.</p> <p>In addition, the engagement described with local businesses, interested parties and landowners largely relates to the previous proposals. There is little indication of attempted re-engagement or support for these proposals (while accepting that they may be perfectly content with them).</p> <p>The (eventual) construction of HS2 will lead to fundamental changes to the environment and layout of the parish. The NP does little to acknowledge those or to indicate potential opportunities for improvements to be made once the construction phase is complete. Equally the relief road.</p> <p>Specific comments: Contents page Appears not to match the document eg page 14 does not contain any reference to AGT1 Garden Town Principles</p> <p>5.2 I visit The Hawthorns estate regularly and there are no green buffers between it and existing housing</p> <p>6.2 A slightly misleading statement given that (as is acknowledged and explained later in 8.1) not all 2480 houses are within the parish</p> <p>11.10 I would have assumed that the authors would have checked that hyperlinks worked, but this one (there may be</p>
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		<p>others) does not link to an existing page</p> <p>16.8 / 16.9 This is the rather oblique reference to the scaling down of plans. Why not be more transparent about what has been removed?</p> <p>Sections 17 and 18 A very good summary of the key points and how they are to be addressed</p> <p>21.4 While I accept the sentiment behind all these designations, it's hard to recognise the 'beauty' of the green spaces in the new developments (to justify those designations) and there seems little merit in the designation of the land at Swallow Lane / Irvine Drive - it doesn't at first sight meet the necessary conditions.</p> <p>GI2 How does this policy stack up against the latest proposals for AGT1, which have just been highlighted via yellow planning notices on Lower Road?</p> <p>23.5 Noted in passing that the councillor who chairs the NP Steering Group lives on the south-east boundary of the village and has been particularly active in opposing any form of development there. Might this policy be subject to challenge from potential developers on the basis of personal interests?</p> <p>24.13 The former Methodist church appears to be the venue for another church these days</p> <p>25.3 There is no reference to secondary school provision in this section, which would seem equally relevant</p> <p>CF2 Very good - exactly what is required</p> <p>27.3 This isn't a policy as it is written. The words 'will be supported' should be added</p>
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		<p>28.2 The second bullet point doesn't make sense - should the first 'that' read 'the'?</p> <p>28.3 As I understood it, speeding is not the big issue it was once thought to be. Certainly not here on Lower Road given all the construction work.</p> <p>29.2 It seems hard to justify the inclusion of John Colet School in this list when the majority of that journey will be outside the parish boundaries, and the part which is would be catered for by the inclusion of the Triangle Business Park. Equally, it's hard to see many cyclists and pedestrians choosing to make purchases from Chiltern View Nursery, given the nature of the goods available there</p> <p>29.4 I would ask you to reflect on the practicality of this with regard to Station Road. At the church end, there is no spare space between the pavement and existing property boundaries to be able to widen the footpath or create designated cycle lanes. And good luck asking someone to foot the bill for widening the railway bridge</p> <p>TT3 This section makes no mention at all of trains. It should also mention the potential issue of the stopping up of Risborough Road for existing bus routes.</p> <p>31.2 You need to be a little careful about funding bus services to new developments. A bus running from AGT1 to/from Aylesbury Town Centre may attract enough passengers from points along that route to adversely impact the profitability of existing services, leading to their withdrawal. If or when the funding ceases, there are then no services in place.</p> <p>31.3 Why are 'Oxford, via Haddenham' and 'Tring and Berkhamsted' listed here when there are no existing bus links there from the parish and residents would not reasonably expect to travel there without changing at Aylesbury Bus Station?</p>
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		<p>H1 The previous suggestion of a Conservation Area seems to have been removed. This looks like a more sensible proposal.</p> <p>35.4 Given its revival, should The Bull be added to this list? It's my understanding that the owners of properties have the right to object to being listed. Is that correct, and if so, should the wording reflect that?</p> <p>Appendix 3 I'm afraid that mention of these three bus shelters and two notice boards as being of great character merit (as opposed to just being useful, which I dare say they are) had me checking that it was not April 1st</p>
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What is your full name? - Name	Please indicate whether you support or object to the submitted Neighbourhood Plan. - Support/Object	Please provide your comments, suggested changes or reasons for objecting. - Comments
Mungo Joseph Duncan	I support the submitted Neighbourhood Plan and would like to provide comments or suggest changes	<p>I believe that having been developed through extensive consultation with residents across the Parish and by authors who strongly understand the community, this Neighbourhood Plan strongly reflects the needs, wishes and aspirations of our local but widely spread community.</p> <p>This community has been overwhelmed by developments, with over a thousand new homes over the past few years and a further 2500 to come, with HS2 affecting us daily and cutting the SW of the community off from the countryside, with SEALR further cutting the village in two. We desperately need quality of life measures, we need balance between further residential development and additional industry or business, we need considered &amp; sensible infrastructure improvements defined &amp; agreed by the community rather than faceless unelected &amp; unaccountable civil servants (and rubber-stamped by Party apparatchik councillors) who have rarely if ever even been to this village.</p> <p>We need for this Neighbourhood Plan to be accepted in toto so that we can for the first time actually take practical responsibility for our own community and to a greater extent define our own future without being at the mercy of every virtue-signalling scheme adopted by Bucks Council for the sake of popularity.</p>
Itzel Rivas	I support the submitted Neighbourhood Plan and would like to provide comments or suggest changes	I used to live in Chequers Court and the area would have been a lifesaver during lockdown. I'm very pleased to see the hard work that has gone into this plan and hope that it will be successful. Aylesbury needs community spaces to strengthen bonds between neighbours and this area will definitely achieve that goal.

What is your full name? - Name	Please indicate whether you support or object to the submitted Neighbourhood Plan. - Support/Object	Please provide your comments, suggested changes or reasons for objecting. - Comments
Nick Hills	I support the submitted Neighbourhood Plan and would like to provide comments or suggest changes	<p>I live in the Stoke Leys area of the Parish and have a comment to make in respect of protecting green space and recreational areas for the community, and in particular the former Bucks Sports and Social Club Fields.</p> <p>This is a much valued and needed area of recreation that used to be enjoyed by all of the community. As a local resident I have been fortunate to remember when access to the green space wasn't restricted. The positive impacts on health and wellbeing were immeasurable at the time. I used it to enjoy a whole range of activities with family and friends, including football, cricket, rounders, kite flying, blackberry picking, dog walks, fitness, and general relaxation.</p> <p>Although we had to accept the closure of the Sports and Social club, that was also enjoyed by many, it wasn't the most important thing to the community. We still had access to the fields, and it is this space that is the most important. As I have already mentioned the benefits were immeasurable at the time. But since the whole site was ruthlessly fenced off, restricting access, during a time of the Covid Pandemic, the impact on my own health and wellbeing has been considerable. Not just because I couldn't use it for myself, but also having nowhere, other than the impractical and dangerous streets, for my children to go and play. This essentially kept them housebound which is not acceptable. You may think this is an over-exaggeration but I promise you it's not, it was a terrible terrible time. This space is so important to us now, but more importantly for our children and future generations. There just isn't another facility like this that can be used by the community, without the need of having to driving to other community centres in Stoke Mandeville, Aston Clinton, and Weston Turville.</p> <p>This green space has so much potential to be developed into a thriving community hub of it's own, that will support the existing residents and the new developments in the area that are already under construction. With little investment and time the facility could step out of the shadow of the existing club and be the heartbeat of the community. Something providing a range of social, sporting, leisure, and wellbeing activities that will serve and support all needs, and something that we can be proud of.</p> <p>The positive impact on retaining and developing the space for recreational use by the community must surely</p>

What is your full name? - Name	Please indicate whether you support or object to the submitted Neighbourhood Plan. - Support/Object	Please provide your comments, suggested changes or reasons for objecting. - Comments
		outweigh the need for a handful of houses in an already overdeveloped area of Stoke Mandeville Parish.



What is your full name? - Name	Please indicate whether you support or object to the submitted Neighbourhood Plan. - Support/Object	Please provide your comments, suggested changes or reasons for objecting. - Comments
Sabrina Cox	I support the submitted Neighbourhood Plan and would like to provide comments or suggest changes	<p>Residents need to be given more control over the conversion of land around them.</p> <p>The complete lack of planning for green spaces, sport facilities, and local social areas between Aylesbury and Stoke Mandeville shows that those not living in the area are making decisions.</p> <p>Stoke Leys are fighting to keep their only local green space. The fields between the town and the village are currently two massive building sites. By supporting the Neighbourhood Plan, the residents are given a voice.</p> <p>Putting the residents voice back into the developments is vital.</p>
Paul Martin Giddings	I support the submitted Neighbourhood Plan and would like to provide comments or suggest changes	This area is so desperately in need of both green space, sports facilities and a community meeting hub. Support amongst every resident in the surrounding area is 100% behind the neighbourhood plan.
Ann giddings	I support the submitted Neighbourhood Plan and would like to provide comments or suggest changes	It's vitally Important that the Bucks Sports and Social Club is kept as a very much needed green space. With thousands of houses proposed for our area, Sports and leisure areas and facilities should be priority.
Joanne Field	I support the submitted Neighbourhood Plan and would like to provide comments or suggest changes	The health benefits from green spaces saves the NHS millions each year with proven benefits to peoples health and wellbeing. At a time when obesity is an epidemic and youngsters are being sucked even deeper into an addictive world of gaming and social media, it has never been more important for us to have open green spaces.
Mrs M Sanghani	I object to the submitted Neighbourhood Plan and will provide comments to explain my reasons	<p>Preserve green area.</p> <p>Currently too much traffic</p> <p>Stoke Mandeville is a village and should not be developed anymore.</p> <p>Have any thoughts been put into the damage that will do to the infrastructure.</p>

What is your full name? - Name	Please indicate whether you support or object to the submitted Neighbourhood Plan. - Support/Object	Please provide your comments, suggested changes or reasons for objecting. - Comments
Santosh Kirve	I support the submitted Neighbourhood Plan and would like to provide comments or suggest changes	I support the Stoke Mandeville Neighbourhood Plan as it reflects the interests and aspirations of our local community. We feel that our parish has been targeted by development from all sides and the neighbourhood plan is trying to maintain sports and recreational facilities and green space for its residents as well as creating much-needed additional healthcare infrastructure and educational and employment opportunities within the parish. The parish Council has done an amazing job creating this master plan and we wholeheartedly support it.
Narotam Lathia	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Suzanne Knox	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	
Elizabeth Arman	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Paul Arman	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Natalie Arman	I support the submitted Neighbourhood Plan but do not wish to make any	Not Answered

What is your full name? - Name	Please indicate whether you support or object to the submitted Neighbourhood Plan. - Support/Object	Please provide your comments, suggested changes or reasons for objecting. - Comments
	comments or suggest changes	
James Arman	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Adam Bruton	I support the submitted Neighbourhood Plan and would like to provide comments or suggest changes	Open green space for use by all. Adoption of the land by the local parish and no more houses on this crowded site is the priority.
Darren K Smith	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Jo Smith	I support the submitted Neighbourhood Plan and would like to provide comments or suggest changes	I particularly support the retention of open green spaces. Without the use of the BCC sports ground the hospital end of the parish is sadly lacking in open green spaces which is impacting on families and children. The parish desperately needs to retain and improve on green space.
Sarah Hills	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Andy Hubblid	I support the submitted Neighbourhood Plan but	Not Answered

What is your full name? - Name	Please indicate whether you support or object to the submitted Neighbourhood Plan. - Support/Object	Please provide your comments, suggested changes or reasons for objecting. - Comments
	do not wish to make any comments or suggest changes	
Nigel Glover	I support the submitted Neighbourhood Plan and would like to provide comments or suggest changes	The Neighbourhood Plan is an impressive document. it is well written and presented and makes a strong case for the preservation of Stoke Mandeville village as a physically distinct community rather than another suburb of Aylesbury. The policies put forward accommodate the inevitable development of the South side of Aylesbury but mitigate the impact on the rural environment . As a long term resident of the I believe it is vitally important the village retains its character and integrity and does not as and the housing development does not result in the coalescence of the village and South Aylesbury. The location of the proposed green buffer separating new development from the existing settlement is particularly welcome.
Lorraine Vaillant - Glover	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered
Patricia Wood	I support the submitted Neighbourhood Plan and would like to provide comments or suggest changes	A comprehensive and well written plan. Well done to all those involved.
Lesley Turner	I support the submitted Neighbourhood Plan but do not wish to make any comments or suggest changes	Not Answered

Planning Policy Team  
Buckinghamshire Council  
Walton Street Offices  
Walton Street  
Aylesbury  
Bucks  
HP20 1UA

Our ref: APL-043E  
Your ref:

Date: 18 April 2024

Dear Sir/Madam,

**D-AGT1 Consortium Response to Consultation on the Stoke Mandeville Parish Neighbourhood Plan 2023-2028**

These representations to the consultation on the Stoke Mandeville Parish Neighbourhood Plan 2023-2028 ('the SMNP') are submitted by the principal landowners and promoters of the D-AGT1 allocation site in the adopted Vale of Aylesbury Local Plan (namely Lands Improvement, CALA, Blenheim Strategic Partners LLP and Redrow Homes) herein referred to as 'the Consortium'.

The Consortium has actively engaged with the Parish Council, particularly through the workshop process that informed the production of the Aylesbury Garden Town 1 SPD which was adopted in October 2023. The Consortium fully understands why the Parish Council wish to produce a Neighbourhood Plan for the area and the Consortium supports the principle of having a Neighbourhood Plan across the Parish. However, having reviewed the SMNP and accompanying documentation, the Consortium considers that the SMNP deviates away from the adopted Vale of Aylesbury Local Plan ('the VALP') and the adopted Aylesbury Garden Town 1 SPD ('the SPD').

A Neighbourhood Plan needs to meet the Basic Conditions, which are:

1. The Neighbourhood Plan has regard to national policies and advice contained in guidance issued by the Secretary of State. (e.g., National Planning Policy Framework and Guidance).
2. The making of the Neighbourhood Plan contributes to the achievement of sustainable development.

3. The making of the Neighbourhood Plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).
4. The making of the Neighbourhood Plan does not breach, and is otherwise compatible with, EU obligations (particularly, the Strategic Environmental Assessment Directive), Environmental Impact Assessment Directive, and the Habitats and Wild Birds Directives).
5. The making of the Neighbourhood Plan is not likely to have a significant effect on a European site (as defined in the Conservation of Habitats and Species Regulations 2010), either alone or in combination with other plans or projects.

For the reasons set out in these representations, the Consortium object to the SMNP and consider it does not meet the Basic Conditions for the following reasons:

- The Neighbourhood Plan fails to comply with the strategic Policies of the VALP, in particular policies D1 and D-AGT1;
- Much of this failure to comply relates to the SMNP proposal to introduce a green buffer (Policy GI2) in a different location to that shown in the SPD.
- The Neighbourhood Plan does not contribute to the achievement of sustainable development as it does not positively plan for sustainable development and instead includes policies that would have the opposite effect in many instances;
- Policies within the SMNP, such as CF1 include requirements that either are not practical and enforceable, such as houses not being sold until schools are ready to take pupils or are not justified e.g. Policy TT2 seeking additional contributions and measures that are not proportionate.
- The SMNP is not consistent with national policy and advice and does not meet the Basic Conditions tests.

The Consortium wishes to work positively with the Parish Council to resolve these matters and the following analysis sets out several ways in which the SMNP should be amended to help it meet the Basic Conditions tests.

## Background

The Consortium worked collaboratively with Buckinghamshire Council ('BC') for a number of years to prepare the SPD for the D-AGT1 allocation area, as required by the VALP. Throughout this process, the Consortium has proactively engaged with the Parish and several Workshops (both high level and technical) took place. There was then a formal round of public consultation on the draft SPD, followed by revisions and updates to the SPD which was finally adopted by BC in October 2023.

The SPD was subject to full, thorough, public scrutiny by the Parish, local residents and technical consultees, prior to adoption.

The SPD is a policy requirement of Policy D-AGT1 in the VALP and, to have been adopted, needed to be in conformity with the policies contained within the VALP. The purpose of the SPD is to provide an overarching planning and masterplan framework to help guide and inform future planning applications and decisions within the D-AGT1 allocation area. The SMNP should, therefore, be consistent with both the VALP and the SPD (given the



relationship between the SPD and the VALP), and should not introduce contradictory policies. To do so would fail Basic Condition 2, as it would not contribute to the achievement of sustainable development (being contradictory to adopted policy and guidance), and Basic Condition 3, being not in conformity with strategic policies in the VALP.

### The SMNP – Overview Point

As set out earlier in these representations, it is a requirement of any Neighbourhood Plan to meet the Basic Conditions test. Of particular relevance in this instance is Condition 3, wherein the Neighbourhood Plan must be in general conformity with the strategic policies contained in the development plan for the area. In this instance, the Vale of Aylesbury Plan forms the development plan for the area, and thus the SMNP must be in general conformity with the strategic policies of the VALP.

Chapter 4 of the VALP is entitled “Strategic Delivery”. The policies contained within this chapter are, therefore, clearly strategic policies and thus the SMNP must be in general conformity with these policies. A failure to do so would result in the SMNP failing the Basic Conditions test. For the reasons set out in the following analysis, several of the policies are not in general conformity with the strategic policies of the VALP, principally Policy D-AGT1.

The matters raised in this response, and changes proposed, could be made without undermining the Parish’s main aims of producing a Neighbourhood Plan. The removal of Policy GI2, and amendments to Policies CF1, CF2, CF3, TT1, TT2 and BD1 would result in a Plan that would meet the Basic Conditions test. These matters are set out in more detail in the following sections.

### Green Infrastructure Policy GI2 – The Green Buffer

Policy GI2 proposes a “green buffer” of more than 20m in width, along the entire southern and parts of the eastern and western boundaries of the AGT1 site. It states that this buffer is in response to Policy D-AGT1 in the VALP, and, that the SPD does not provide such a buffer.

The SPD, however, does include a buffer. Section 4.2.1 of the SPD provides clear guidance and proposals for a “Strategic Buffer” that will “*preserve the separate identity of Stoke Mandeville village, whilst providing an attractive resource for its residents*”.

The green buffer in Policy GI2 is not landscape led, nor does it follow sound principles. It has been designed solely to provide open space behind back gardens of existing residents, and does not have regard to principles of good design. If the buffer proposed in GI2 was implemented, it would result in back gardens on to public open space, which can result in poor design through inconsistent back garden boundary treatment. Furthermore, there is the risk of crime through ease of access from the open space to back gardens. Finally, the buffer does not consider the existing brook that runs through the eastern parcel of AGT1 and how the buffer would relate to that feature.

The buffer identified in the SPD was designed following consultation and design workshops, and is part of a wider landscape led design for the AGT1 area. It follows the route of the watercourse, using that to create a buffer that is an attractive and

welcoming feature of the development, rather than as a ‘dividing’ feature which the SMNP appears to propose.

Policy GI2 would result in a poor design, and would not, therefore, contribute to achieving sustainable development in social or environmental respects. The SMNP therefore fails Basic Condition 2.

Furthermore, it contradicts with the adopted SPD. Policy D1, a strategic policy within the VALP, requires the production of an AGT1 Masterplan SPD. This requirement is further explained in the accompanying text to Policy D1, with Policy D-AGT1 then identifying what the allocation is required to provide. The SMNP therefore fails Basic Condition 3 as well. **Policy GI2 (and the accompanying text and references) must, therefore, be removed from the SMNP.**

#### *CF1 – Educational Facilities and CF2 Medical and Pharmaceutical Facilities*

Policy CF1 requires that houses cannot be sold until schools are ready to take pupils. This is an overly onerous requirement, and one that is out of the control of the developer as they are not responsible for opening of schools. This is not a sound approach, and fails Basic Condition 3 being not in accordance with the strategic policies in the development plan.

Again, the SPD considers the issue of Infrastructure Delivery (Section 5.3), with an Infrastructure Delivery Framework to be produced which will identify the trigger points for infrastructure delivery. **Policy CF1 (and the accompanying text and references), should, therefore, be removed from the SMNP.**

Policy CF2, meanwhile, duplicates policy requirements in the VALP. Policy D-AGT1 requires a financial contribution towards medical facilities to be provided elsewhere, and so there is no need for Policy CF2 to be included in the SMNP. **Policy CF2 should be deleted.**

#### *Policy TT1 Active Travel and TT2 Traffic Congestion*

Policies TT1 and TT2 are not in general conformity with Policy D1 and D-AGT1 of the VALP (and the D-AGT1 SPD). They are not based on evidenced needs which justify why the development should contribute to the named improvements, and Policy TT2 would, in our view, fail the CIL 122 Regulations test as the proposed improvements are not directly related or proportionate to the development.

As well as repeating policies/requirements in the Development Plan, these policies are not in general conformity with the VALP and therefore fails the Basic Conditions test. **Policy TT1 should be amended to make it clear that developments are encouraged to provide these improvements, but it is not a requirement. Policy TT2, however, should be removed from the SMNP.**

#### *Policy BD1*

The Consortium understands the Parish’s aspirations for new café and restaurant facilities within the Parish. However, the proposed wording of Policy BD1, and in particular paragraph 32.8 which states that it is a “condition for new development within AGT-1 and AGT-2” to provide such facilities is not based on evidence and is not in accordance with Policy D-AGT1 or the SPD.

The evidence base for the Local Plan did not identify a need for such facilities, and, given the relative population and availability of facilities elsewhere, it is questionable whether such facilities would be viable in this location. The SPD includes a requirement (paragraph 4.5.9) for a Local Centre, which would include shops and/or hot food and takeaway (such as a café), and it will be for the market to dictate the form this facility then takes. The SMNP is overly prescriptive by requiring space for both a café and restaurant in this location.

The policy and accompanying text should, therefore, be amended to refer to the SPD and state that there is a desire to see such facilities, and developments within D-AGT1 will be encouraged to include such facilities in accordance with the SPD.

### Summary

In summary, therefore, the Consortium recognises the significant amount of hard work undertaken by the Parish Council and associated colleagues and congratulates all of those involved.

It is, however, the Consortium view that the SMNP currently fails the Basic Conditions test for Neighbourhood Plans in several areas. Many of these matters can be swiftly rectified by removal of matters relating to the D-AGT1 site and instead a simple reference back to the VALP and the SPD as the correct policy framework for covering such issues.

We would be happy to discuss any of the points set out in these representations if that would assist the Parish Council, Buckinghamshire Council and the future Examiner in amending the Plan.

We trust that these representations will be taken into full consideration and reserve the right to appear at the Examination.

Yours faithfully

A large black rectangular redaction box covering the signature area.

Mark Schull

Arrow Planning Limited on behalf of CALA Homes, LIH, Blenheim Strategic Partners LLP and Redrow Homes

Planning Policy Team  
Buckinghamshire Council  
Walton Street Offices  
Walton Street  
Aylesbury  
Bucks  
HP20 1UA

Our ref: APL-444

Your ref:

Date: 18 April 2024

Dear Sir/Madam,

## **Land & Planning Collective Response to Consultation on the Stoke Mandeville Parish Neighbourhood Plan 2023-2028**

These representations to the consultation on the Stoke Mandeville Parish Neighbourhood Plan 2023-2028 (‘the SMNP’) are submitted by Arrow Planning, acting as part of the Land and Planning Collective, on behalf of Mr and Mrs Bone, the owners of Wendover Road Business Centre which includes Chiltern View Nursery, Enterprise Skip Hire, Hippo Waste and the Chiltern View Café.

The businesses making up the Business Centre are significant local employers. Indeed, the ‘Business and Farming Evidence Paper’ (‘BFEP’) that has informed the SMNP recognises this with over 50 employees identified across the various companies. The Business Centre, and our clients as local employers, play a vital role within the local community and economy by providing local job opportunities and local services and facilities.

A Neighbourhood Plan needs to meet the Basic Conditions, which are:

1. The Neighbourhood Plan has regard to national policies and advice contained in guidance issued by the Secretary of State. (e.g., National Planning Policy Framework and Guidance).
2. The making of the Neighbourhood Plan contributes to the achievement of sustainable development.
3. The making of the Neighbourhood Plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).

4. The making of the Neighbourhood Plan does not breach, and is otherwise compatible with, EU obligations (particularly, the Strategic Environmental Assessment Directive), Environmental Impact Assessment Directive, and the Habitats and Wild Birds Directives).
5. The making of the Neighbourhood Plan is not likely to have a significant effect on a European site (as defined in the Conservation of Habitats and Species Regulations 2010), either alone or in combination with other plans or projects.

For the reasons set out in these representations, Mr & Mrs Bone object to the SMNP and consider it does not meet the Basic Conditions. The Neighbourhood Plan does not contribute to the achievement of sustainable development as it does not positively plan for sustainable development and instead includes policies that would have the opposite effect in many instances, thereby failing Basic Condition 2.

Our client wishes to work positively with the Parish Council to resolve these matters and the following analysis sets how the SMNP should be amended so that it would comply with Basic Condition 2.

## Background

The July 2021 Draft SMNP covered a longer period (2021-2033) and presented an “ambitious, but realistic” plan for the Neighbourhood Area. This ambition is sadly lacking in the submitted version that is now on consultation.

Both the 2021 and submission versions of the SMNP include the recognition (paragraph 17.15 in the SMNP) that local people felt that new business development should be encouraged. This reflects the findings identified in the BFEP, which forms part of the evidence base for the SMNP. Paragraph 34 of the BFEP identified local views that more job opportunities are needed in the Parish. The analysis in paragraph 39-42 of the BFEP found that “employment is relatively significantly harder to find in Stoke Mandeville than other local Parishes.....Local opinion is strongly in favour of more jobs in the Parish.....**These key issues need to be addressed in the Neighbourhood Plan**” (emphasis added).

The 2021 version proactively sought to address these findings and analysis, proposing new employment allocations on land next to Wendover Road Business Centre and Triangle Business Park. Figure 1, below is an extract from the 2021 Plan showing this allocation under Policy KSPB3:



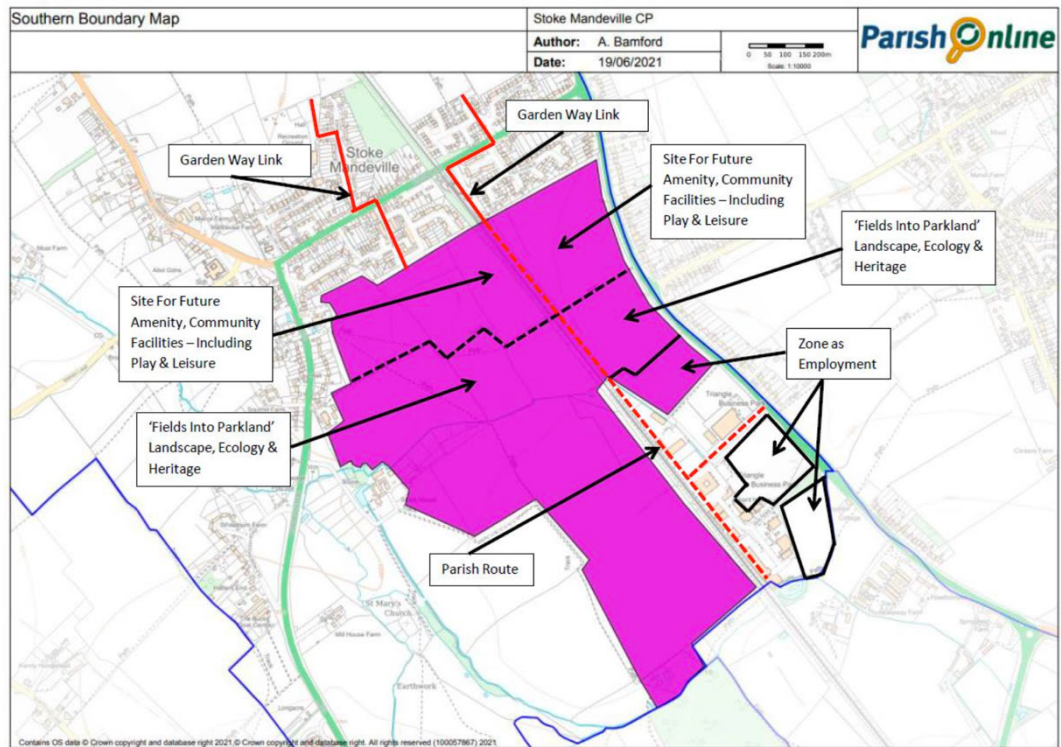


Figure 1: Extract from July 2021 Neighbourhood Plan

Policy KSPB3 stated:

*“The land within the Southern Boundary shown on the policy map is designated for employment and business use”.*

This allocation has, sadly, been removed from the submission SMNP. This is considered further below.

### Sustainable Development

As set out earlier in these representations, it is a requirement of any Neighbourhood Plan to meet the Basic Conditions test. Of particular relevance in this instance is Condition 2, wherein the Neighbourhood Plan must contribute to achieving sustainable development.

Paragraph 8 of the NPPF (December 2023) states that the economic objective of achieving sustainable development is

*“to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;”*

The SMNP fails to meet the economic objective of sustainable development. The evidence base (BFEP) identifies a clear need for new employment within the Parish. This evidenced need was considered of such importance that the previous iteration of the Plan proposed allocations to address this need. The submission version, despite relying upon the same evidence base, fails to address this evidenced, and locally



supported, need. **The SMNP does not meet the economic objective of sustainable development, and therefore fails Basic Condition 2.**

Instead, the SMNP has moved to a position of restricting and preventing development, rather than grappling with the issue of identified economic needs and local job opportunities. The requirement for “cafes and restaurants as well as food and other shops” will create some jobs, but will not provide job opportunities for light commerce, industry, research and skills-based jobs, all of which are identified in the BFEP (paragraph 34).

To make the SMNP meet the Basic Conditions tests, therefore, new employment allocations are necessary. Given it has already been subject to public consultation, and is based on sound principles, it is proposed that Policy KSPB3 is reinstated (and retitled) within the SMNP and the allocations proposed on the SMNP policies map. The land in question, subject to the previous proposed allocation, is excellently located being immediately adjacent to the existing employment sites and the Wendover Road, a major arterial road. Moreover, there are excellent public transport links with bus stops on Wendover Road outside the Business Centre, and a dedicated cycle way which connects to Station Road, with the railway station a short distance.

The land is, therefore, sustainably located and represents a logical location for a new employment allocation that would meet identified local needs. The SMNP does not currently include any allocations to meet these needs, and fails the Basic Conditions test without this amendment.

### Summary

In summary, therefore, the SMNP fails to plan appropriately for identified local employment needs. As a result, the SMNP fails the Basic Conditions test for Neighbourhood Plans. This can be rectified by reinstatement of the proposed employment allocation adjacent to Wendover Business Centre, as identified in Policy KSPB3 in the July 2021 version of the SMNP. A failure to do so would mean the SMNP does not contribute to achieving sustainable development.

We would be happy to discuss any of the points set out in these representations if that would assist the Parish Council, Buckinghamshire Council and the future Examiner in amending the Plan.

We trust that these representations will be taken into full consideration and reserve the right to appear at the Examination.

Yours faithfully

A large black rectangular redaction box covering the signature of Mark Schull.

Mark Schull

Arrow Planning Limited, acting as part of the Land & Planning Collective on behalf of Mr & Mrs Bone



## Stoke Mandeville Neighbourhood Plan Submission Consultation

### Objection by Juniper Investments Limited to Policy GI2

1. Juniper Investments Limited (Juniper) own land within the general extent of the Aylesbury Garden Town allocation D1-AGT1 identified pursuant to Policy D1 of the Vale of Aylesbury Local Plan (VALP). There is a requirement that a neighbourhood plan should be in general conformity with, rather than conflict with, the local plan and not to provide an unnecessary additional level of detail to that already set out in the strategic policies of the local plan.
2. Against this context, Juniper's objection to the Stoke Mandeville Neighbourhood Plan Submission Consultation (NP) is directed at Policy GI2 which is concerned with the establishment of a Green Buffer within the VALP D1-AGT1 allocation. It is unnecessary for there to be such a policy in this Neighbourhood Plan.
3. Pursuant to VALP Policy D1 and the reference in the explanatory text at paragraph 4.39, As is, Buckinghamshire Council has adopted the AGT1 Masterplan Supplementary Planning Document for AGT1 (SPD). The existence of the SPD is recognised in NP paragraphs 15.1 and 15.2 where an extract showing the masterplan of the VALP D1-AGT1 allocation is provided. This masterplan includes a green buffer area between the proposed built forms of development and Stoke Mandeville.
4. Paragraph 22.6 of the Neighbourhood Plan explains that Policy GI2 is required because there is no Green Buffer shown in the VALP or the SPD. However, this is factually incorrect because such a Green Buffer is demonstrably included in the SPD. In any event, the stated rationale for including NP Policy GI2 does not stand-up to scrutiny.
5. Reference is made in NP paragraph 22.1 to the proposed Green Buffer primarily providing for privacy and mitigating the loss of amenity for existing residents, as required by the National planning Policy Framework (NPPF). However, there is no such reference in the NPPF (nor the VALP) to the need for a Green Buffer to provide privacy for existing residents and to mitigate the loss of amenity associated with a proposed development. Extending the role of the Green Buffer undermines its original planning purpose.



6. The purpose of the Green Buffer between the new development and Stoke Mandeville as expressed in the VALP (reference is made to a Buffer) and SPD (the term Strategic Buffer is used) is to maintain the setting and individual identity of the settlement of Stoke Mandeville (this is helpfully set out at NP paragraph 22.5). The purpose of the Green Buffer as stated in NP Policy GI2 and the explanatory text is inconsistent with, and not in general conformity with, the VALP and the associated SPD.
7. The provision of the Green Buffer and providing separating between Stoke Mandeville and the built development associated with the VALP D1-AGT1 proposal is secured via criterion (o) and the masterplanning included in the SPD (the Strategic Buffer). It is unnecessary to introduce an additional level of detail another layer through this Neighbourhood Plan which goes beyond the references to a buffer in the VALP and its associated SPD.
8. In addition to the principle of including an unnecessary layer of policy duplicating the VALP and its associated SPD (paragraph 22.2), as drafted NP Policy GI2 conflicts with the requirements of the VALP and the SPD.
9. NP paragraph 22.4 introduces new criteria which go beyond the VALP requirements. There is no requirement in VALP D1-AGT1 that the Green Buffer has to be publicly accessible because this is not the purpose of the buffer. Indeed, the SPD refers to a substantial swathe of public open space and retained agricultural land which will preserve the separate identity of Stoke Mandeville (Section 4.2.1). No all the buffer has to be public open space.
10. Any public access to the Green Buffer (other than statutory rights) is dependent upon the ability of the landowners and promoters of the built development of the VALP D1-AGT1 allocation to both control the land and provide publicly accessible open space. This Neighbourhood Plan cannot require public access to privately owned land. It could potentially seek to require the promoters of the VALP D1-AGT1 to include the Green Buffer as part of a comprehensive application. In any event, there is a demonstrable conflict between NP Policy GI2 and the strategic policy of the VALP regarding public access.
11. Currently, the promoters of VALP D1-AGT1 have not engaged with Juniper to secure public access to the company's land with the Green Buffer, including any links into Stoke



Mandeville, as part of the wider public open space offering associated with the proposal. As such, Juniper's land would remain in agricultural use as envisaged by the SPD. It is assumed that if Stoke Mandeville Parish Council wants to secure public access to the Green Buffer then arrangements would be made to either purchase the land or financially compensate Juniper. This is not a matter for the Neighbourhood Plan.

12. Further, is there any logical planning reason why gardens should not be included in the Green Buffer? Where such strategic buffers exist elsewhere in the country, and even in Green Belts, gardens are included as part of the buffers and they have an open character that would, in this case, contribute to the setting of Stoke Mandeville.
13. Paragraph 22.3 of NP Policy GI2 lacks clarity and is somewhat meaningless. Any planning applications within the VALP D1-AGT1 allocation would be assessed against the up-to-date policies of the VALP. As already highlighted, there is provision in VALP D1-AGT1 for a buffer between the proposed built forms of development and Stoke Mandeville. Again, this specific policy criterion is unnecessary.
14. The change to the Neighbourhood Plan sought by Juniper is the deletion of Policy GI2.

Version: Final  
Date: 18 April 2024

# STOKE MANDEVILLE NEIGHBOURHOOD PLAN (REGULATION 16 CONSULTATION)

response on behalf of Richborough

JBB8650.C8529  
18 April 2024



## REPORT

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### Document status

Version	Purpose of document	Authored by	Reviewed by	Approved by	Review date
draft	Representations	DRO	PH	PH	8.4.23
Final	following client review	DRO	PH	PH	18.4.24

### Approval for issue

Paul Hill [PH] 18 March 2024

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**Prepared by:**

**RPS**

**Prepared for:**

**Richborough**

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**APPENDIX 1** Representations to Stoke Mandeville Pre-submission (Regulation 14) consultation on behalf of Richborough , August 2021

**Appendix 2** Resignation Email from former Chair of SMNP Steering Group



# 1 INTRODUCTION

- 1.1 RPS has been instructed by Richborough (“RE”) to prepare a response to the submission (Regulation 15) version of the Stoke Mandeville Neighbourhood Plan (‘SMNP’) issued for consultation by Buckinghamshire Council (‘BC’) in accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations (“the Regulations”). The SMNP has been submitted to BC by Stoke Mandeville Parish Council (‘SMPC’) and is dated 20 February 2024.
- 1.2 RE has an interest in Land east of Risborough Road, Stoke Mandeville (‘the Site’) which lies within the SMNP designated area. In this context, RE has been engaged with the SMNP process, given its major interest in the Site, and submitted representations to the previous consultation at Regulation 14 pre-submission stage in August 2021.
- 1.3 A copy of the previous representations is appended to this submission (**Appendix 1**). Chapter 4 of those representations had identified concerns with the consultation process and the lack of constructive engagement carried out by SMPC with the landowners and RE on matters relating to the emerging SMNP. Appendix 1 also encloses a copy of Richborough’s Vision Document for its land interests on the southern side of Stoke Mandeville.
- 1.4 Following the close of the Regulation 14 consultation, RPS/Richborough were contacted by the SMNP Steering Group in 2022. There then followed meetings with the Steering Group who were looking to make positive new allocations in the SMNP. This included detailed discussions on how Richborough’s land interests could be part of a wider masterplanning for the village with the potential allocation of land for development. However, despite this constructive and forward-thinking approach by the SMNP Steering Group, unfortunately we received notification (**Appendix 2**) that the Chair and other colleagues had resigned. Following this it is noted the SMNP has taken a new direction with a new membership and no longer includes any new allocations (beyond existing VALP allocations). In this instance, it must be noted that the SMNP does not contain policies and allocations to meet its identified housing requirement (see paragraphs 67-68) which means the SMNP does not benefit from the protections under national policy<sup>1</sup>.
- 1.5 Furthermore, given the lack of new additional development allocations, RPS agrees that a Strategic Environmental Assessment (SEA) is screened out at this stage<sup>2</sup>. However, should the Examiner decide to recommend that the allocation of land is necessary to ensure the SMNP meets the basic conditions, then RPS suggests the SMNP should be taken back to the draft Plan (Regulation 14) stage where the assessment and selection of alternative site options can be considered and consulted upon. In this context, the Land east of Risborough Road, Stoke

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<sup>1</sup> NPPF 2023 paragraph 14

<sup>2</sup> As confirmed at paragraph 48 of the *Stoke Mandeville Neighbourhood Plan– Updated Draft Initial Revised Draft before Submission Strategic Environmental Assessment and Habitats Regulations Assessment Screening Final Screening Outcome October 2023*

Mandeville should be included in this exercise, as previously addressed in the Regulation 13 Response and Vision Document included at **Appendix1**.

- 1.6 RPS has reviewed the draft Regulation 15 policies against the basic conditions and provides responses to those policies as necessary. RE formally requests that the examination of the SMNP takes place via a hearing and not via written representations, on the basis that it is necessary to ensure adequate examination of certain issues and to allow for a fair chance to put forward its case (as per Paragraph 9(2) of Schedule 4B TCPA 1990).

## 2 NATIONAL POLICY FRAMEWORK FOR NEIGHBOURHOOD PLANNING

- 2.1 This section highlights the key elements of national policy and practice guidance that the Parish Council as the Qualifying body should have had regard to in the preparation of the SMNP.

### The Basic Conditions

- 2.2 Paragraph 37 of the National Planning Policy Framework (December 2023) explains that:

*“Neighbourhood plans must meet certain ‘basic conditions’ and other legal requirements before they can come into force. These are tested through an independent examination before the neighbourhood plan may proceed to referendum.”*

- 2.3 The basic conditions are set out in Paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended) and supported by the Neighbourhood Plan chapter of the PPG. They are as follows:

*(2) A draft order meets the basic conditions if—*

*(a) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order;*

*(b) having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order;*

*(c) having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order;*

*(d) the making of the order contributes to the achievement of sustainable development;*

*(e) the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);*

*(f) the making of the order does not breach, and is otherwise compatible with, EU obligations; and*

*(g) prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order.*

### National policy and guidance - summary

- 2.4 The Neighbourhood Plan chapter of the Planning Policy Guidance (PPG) is extensive and is a mandatory material consideration under Basic Condition 8(2)(a). Both the NPPF and the PPG make clear that particular caution should be applied where a qualifying body seeks to introduce any policy which conflicts or impacts upon a strategic site allocated in the adopted development plan, thereby giving rise to a conflict with basic condition 8(2)(e) as well as 8(2)(a) and (d). These references (non-exhaustively) are set out below.

2.5 Paragraph 13 of the NPPF explains the key role that neighbourhood plans play in achieving the presumption, stating:

*“The application of the presumption has implications for the way communities engage in neighbourhood planning. Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.”* (RPS emphasis)

2.6 Paragraph 18 makes clear that neighbourhood plans can only contain non-strategic policies. Paragraph 28 makes clear that those non-strategic policies cannot conflict with the strategic policies. Paragraph 29 of the NPPF clearly explains that neighbourhood plans should not promote less development than set out in the strategic policies for the area or undermine those strategic policies.

2.7 The NPPF and the PPG further explain that a neighbourhood plan must be supported by sufficient and proportionate evidence. This applies with particular force for any land within a strategic allocation. NPPF 31 makes clear that:

*“The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.”* (RPS emphasis)

2.8 NPPF 16(a) and 16(d) and the PPG both state that policies must be clear and supported by sufficient and appropriate evidence. If they are not clear and robustly evidenced, they will not contribute to the achievement of sustainable development and will be inconsistent with planning practice guidance<sup>3</sup>:

***“How should the policies in a neighbourhood plan be drafted?”***

*A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.”* (RPS emphasis)

2.9 Consequently, ensuring the policies brought forward through the SMNP are clearly evidenced and justified will help support the objective of contributing to the achievement of sustainable development, in accordance with paragraph 16(a) of the NPPF.

2.10 It is also worth noting that the SMNP does not propose a housing requirement and does not seek to allocate additional land for housing beyond that which is already allocated through the VALP (a brief summary of the VALP as it relates to the Stoke Mandeville parish area is provided in the next section of this submission). Under these circumstances, the provisions under paragraph 14 of the

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<sup>3</sup> Paragraph: 041 Reference ID: 41-041-20140306 Revision date: 06 03 2014

NPPF are not applicable for the purposes of determining planning applications for residential development within the parish. This means that in situations where the presumption in favour of sustainable development has been triggered, the fact a neighbourhood plan is in place does not itself mean the presumption is disengaged. Notwithstanding the representations made here, given Richborough's engagement with the previous SMNP Steering Group, who were looking to make positive allocations beyond the VALP, it is requested the Examiners Report confirms this position.

- 2.11 Section 4 of this submission makes further reference to national policy and guidance specifically in respect of the SMNP Basic Conditions Statement (BCS).

## 3 DEVELOPMENT PLAN CONTEXT

### Vale of Aylesbury Local Plan

- 3.1 Under criteria (e) of the basic conditions test, the SMNP must be in 'general conformity with the strategic policies contained in the development plan'. In this case, the strategic policies are those in the Vale of Aylesbury Local Plan 2013-2033 (VALP). The VALP sets out the overall scale and distribution of growth, including site allocations, across the district up to 2033.
- 3.2 Stoke Mandeville neighbourhood plan area is located to the south of Aylesbury town. The northern boundary of the parish that defines the neighbourhood plan area incorporates a number of existing suburban estates to the south of the town, as well as a number of strategic allocations identified in the VALP comprising Aylesbury Garden Town (AGT). Stoke Mandeville parish is an area that is not detached from the rest of the district but is very much connected to the district's principal urban area. The parish is not located in the Green Belt.
- 3.3 Stoke Mandeville settlement is located centrally within the neighbourhood plan area further to the south but is well connected to Aylesbury town with good access provided by the rail station. **Policy S2 (Spatial strategy for growth)** identifies the Stoke Mandeville as one of 12 'Larger Villages' in the district. Table 2 of the VALP defines large villages as, '*Larger, more sustainable villages that have at least reasonable access to facilities and services and public transport, making them sustainable locations for development. The plan allocates sites at some of the larger villages.*' The VALP identifies 375 dwellings at Stoke Mandeville settlement, comprising existing commitments and completed development.
- 3.4 In addition, a significant amount of residential development is assigned to other sites within the parish and which form part of the Aylesbury Garden Town (AGT). Policy S2 directs around 16,200 dwellings to the AGT over the plan period. The AGT comprises two strategic allocations; Aylesbury South (AGT-1); and Southwest Aylesbury (AGT-2). Aylesbury South allocation is located within Stoke Mandeville neighbourhood plan area. Policy D1 (Delivering Aylesbury Garden Town) (D-AGT1) plans for the delivery of around 1,000 dwellings on the Stoke Mandeville part of the AGT.
- 3.5 It is clearly evident that the area to the south of Aylesbury, and which lies predominantly in Stoke Mandeville parish, has a critical role in helping to meet the wider needs of the district and achieve sustainable development as defined in the VALP strategy. This is a factor should be taken into account in preparing the policies and proposals for the SMNP.

### Buckinghamshire Plan

- 3.6 Buckinghamshire Council, including the former Aylesbury Vale District Council, is now working on an emerging Buckinghamshire Local Plan (BLP). Once adopted, this will replace the adopted VALP.
- 3.7 An early engagement questionnaire survey consultation was held in February 2022 to start early discussions and find out the issues that local residents and organisations think are important in

shaping the future of the area. A further questionnaire consultation concerning a *Vision and Objectives consultation for Development and Transport for Buckinghamshire 2023* was ended in June 2023. Alongside this, a 'call for sites' exercise was undertaken during May and September 2022 to inform an update to the Housing and Employment Land Availability Assessment (HELAA). In addition, scoping work has been carried out on the approach to Sustainability Appraisal and Appropriate Assessment (Under the Habitats Regulations), but it is unclear whether these have been consulted on.

- 3.8 The preparation of the BLP is therefore still at a very early stage. Furthermore, there is no clear timetable setting out the various stages in the process or the timeline for their completion<sup>4</sup>. Nonetheless, given the SHNP is being progressed at the same time as the BLP and intends to cover the period to 2040, also to align with the BLP plan period, it is critical that the Parish Council and the local authority work together on a shared evidence base to ensure there is no potential for conflicts to arise between the two plans as they move forward<sup>5</sup>.

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<sup>4</sup> A timetable for the BLP must be set out in an up-to-date Local Development Scheme (LDS)

<sup>5</sup> Paragraph: 009 Reference ID: 41-009-20190509 Revision date: 09 05 2019



## 4 BASIC CONDITIONS STATEMENT

4.1 Every neighbourhood plan must be supported by a Basic Conditions Statement (BCS) which is likely to be the main way that a qualifying body (Stoke Mandeville Parish Council) can seek to demonstrate to the independent examiner that its draft neighbourhood plan meets the basic conditions<sup>6</sup>. Practice guidance makes clear this is necessary in accordance with the neighbourhood planning regulations:

***What must a qualifying body do to demonstrate that its neighbourhood plan or Order meets the basic conditions?***

*A statement (a basic conditions statement) setting out how a draft neighbourhood plan or Order meets the basic conditions must accompany the draft neighbourhood plan or Order when it is submitted to the local planning authority (see regulation 15(1)(d) and regulation 22(1)(e) of the Neighbourhood Planning (General) Regulations 2012 (as amended))<sup>7</sup>.*

4.2 RPS has reviewed the BCS and wishes to highlight to the examiner a number of concerns with it. These concerns are focused on the basic conditions (a), (d) and (e).

### **(a) Regard to national policy**

4.3 Paragraphs 3.2 to 3.4 of the BCS states:

*“The National Planning Policy Framework updated 2021 (hereafter referred to as the Framework) sets out the Government’s main planning policies for England and how they are expected to be applied. Further advice can also be found in the Government’s online national Planning Practice Guidance (hereafter referred to as Guidance) first published in April 2014.*

*The neighbourhood plan has, therefore, been prepared with regard to national policies as set out in the Framework and is mindful of the Guidance.*

*The neighbourhood plan has had regard to paragraphs 183 to 185 of the Framework...”*

4.4 Table 1 of the BCS provides some commentary on the regard that has been had to national policy in preparing the SMNP.

4.5 Table 1 of the BCS has included references to the NPPF dated July 2021 as the basis for the assessment under this basic condition. This is important given the date of the publication date of the SMNP is 20 February 2024, which post-dates this version. Under these circumstances, in order to meet this basic condition the BCS should reference the latest version of the NPPF. However, the BCS refers to a version of the NPPF that has now been superseded by the December 2023 version. The BCS has not met this basic condition as it has referred, incorrectly, to an earlier version of the NPPF that is now not of relevance to the making of the SMNP.

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<sup>6</sup> Paragraph: 066 Reference ID: 41-066-20140306 Revision date: 06 03 2014

<sup>7</sup> Paragraph: 068 Reference ID: 41-068-20140306 Revision date: 06 03 2014

- 4.6 Furthermore, planning practice guidance provides clear advice for qualifying bodies on what the BCS should contain. With regards to national policy, under the question ‘Which national policies are relevant to a neighbourhood plan or Order?’<sup>8</sup>, the PPG states:

*“A qualifying body is advised to set out in its basic conditions statement how they have had regard to national policy and considered whether a particular policy is or is not relevant. A qualifying body is encouraged to set out the particular national policies that it has considered, and how the policies in a draft neighbourhood plan or the development proposals in an Order take account of national policy and advice.” (RPS emphasis)*

- 4.7 Table 1 of the BCS covers four aspects; ‘Policy Number’; ‘Policy Title’; ‘Framework References’; and ‘Comment on Conformity in the Neighbourhood Plan’. These aspects are then presented against the various policy areas, comprising ‘CF – Community Facilities Policies’; ‘GI – Green Infrastructure Policies’; ‘Transport and Travel’; ‘Business Development’; and ‘Heritage’.

- 4.8 In respect of the SMNP policies, the BCS only includes ‘references’ to specific paragraphs and sections of the (incorrect) NPPF. However, it does not provide any explanation as to how SMPC has had regard to national policy or why a particular policy in the NPPF is or is not relevant to the SMNP. Furthermore, the BCS does not explain how the specific policies in the SMNP have taken into account the relevant national policy and advice. RPS notes there is cursory consideration to the (incorrect) NPPF under the CF Community Facilities policies only.

- 4.9 The lack of clarity and detail required with regard to national policy and advice demonstrates a significant failing in the BCS, in particular the requirement under the regulations<sup>9</sup> to explain how the proposed neighbourhood development plan meets the requirements of paragraph 8 of Schedule 4B to the 1990 Act.

### **(d) Achievement of sustainable development**

- 4.10 Planning Practice Guidance, under the question ‘What must a qualifying body do to demonstrate that a draft neighbourhood plan or Order contributes to sustainable development?’<sup>10</sup> states:

*“A qualifying body should demonstrate how its plan or Order will contribute to improvements in environmental, economic and social conditions or that consideration has been given to how any potential adverse effects arising from the proposals may be prevented, reduced or offset (referred to as mitigation measures).*

*In order to demonstrate that a draft neighbourhood plan or Order contributes to sustainable development, sufficient and proportionate evidence should be presented on how the draft neighbourhood plan or Order guides development to sustainable solutions.”*

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<sup>8</sup> Paragraph: 070 Reference ID: 41-070-20190509 Revision date: 09 05 2019

<sup>9</sup> The Neighbourhood Planning (General) Regulations 2012, regulation 15(1)(d)

<sup>10</sup> Paragraph: 072 Reference ID: 41-072-20190509 Revision date: 09 05 2019

4.11 Table 2 of the BCS provides an analysis of each draft policy against the three dimensions of sustainable development. Nevertheless, RPS has reviewed the draft SMNP policies and has identified a number of concerns where, in our view, the SMNP is not supporting the achievement of sustainable development. These are set out in the following sections of this submission in respect of those policies.

### **(e) General conformity with the strategic policies of the development plan**

4.12 On general conformity, Planning Practice Guidance states under question ‘*What is meant by ‘general conformity’?*’<sup>11</sup>:

*“When considering whether a policy is in general conformity a qualifying body, independent examiner, or local planning authority, should consider the following:*

- *whether the neighbourhood plan policy or development proposal supports and upholds the general principle that the strategic policy is concerned with*
- *the degree, if any, of conflict between the draft neighbourhood plan policy or development proposal and the strategic policy*
- *whether the draft neighbourhood plan policy or development proposal provides an additional level of detail and/or a distinct local approach to that set out in the strategic policy without undermining that policy*
- *the rationale for the approach taken in the draft neighbourhood plan or Order and the evidence to justify that approach” (RPS emphasis)*

4.13 Paragraphs 3.20 of the BCS states:

*“The neighbourhood plan has been prepared to ensure its general conformity with the development plan for the Vale of Aylesbury District. The following tables thereby set out how each policy in the neighbourhood plan is in general conformity with the appropriate strategic policies in the development plan (VALP).”*

4.14 Table 1 of the BCS also provides some commentary on general conformity with the VALP strategic policies. Nonetheless, RPS has some concerns with respect to the approach taken on certain policy areas in light of the guidance highlighted above.

4.15 Under Community Facilities policies, Table 1 of the BCS states:

*“This Neighbourhood Plan will meet the needs of Stoke Mandeville Parish for community facilities and set out policies and a sustainability plan where the VALP and associated Supplementary Planning Documents fall short in requiring development proposals to include the provision of local services such as medical care, schools and sports & leisure facilities in a timely fashion, i.e. before houses on the development are sold.” (RPS emphasis)*

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<sup>11</sup> Paragraph: 074 Reference ID: 41-074-20140306 Revision date: 06 03 2014

- 4.16 The SMNP is effectively seeking to address what SMPC consider to be deficiencies in the strategic policies with regards to the provision of community facilities. However, seeking the provision of community facilities 'before houses on the development are sold' goes beyond the adopted strategic policies in the VALP (Policy S5 Infrastructure). If made, such change in approach would in our view represent a clear conflict with the strategic policies, which the BCS has not clarified or considered in any detail. Similarly, SMPC provides no evidential basis to support this approach. On this basis, RPS contends the BCS has not adequately demonstrated the SMNP is in general conformity with the strategic policies of the development plan.
- 4.17 RPS provides further detailed responses to draft Policies CF1 and CF2 on this matter in sections 6 and 7 of this submission.
- 4.18 Taken together, **the factors set out above demonstrate a significant lack of explanation and justification in the BCS to demonstrate how the SMNP has met the basic conditions, as required under the neighbourhood planning regulations.**
- 4.19 The following sections of this submission provide detailed responses on those individual draft policies where concerns are raised regarding the basic conditions.

## 5 POLICY GI3: SETTLEMENT BOUNDARY

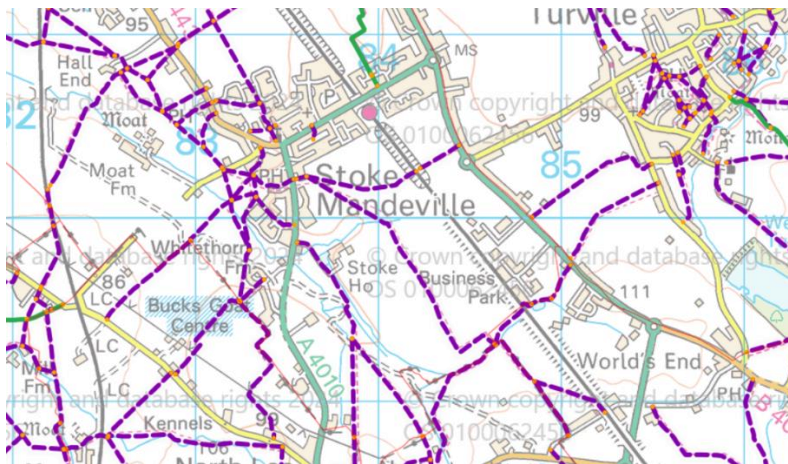
- 5.1 There is no policy or guidance at national policy or strategic policies that explains how settlement development boundaries should be defined in neighbourhood plans. Nonetheless, any attempt to define a new settlement boundary must be based on 'adequate and proportionate'<sup>12</sup> and 'appropriate' evidence in order that the proposal is justified. Without this, the policy will not meet the basic conditions.
- 5.2 SMPC is seeking to define a 'settlement' boundary along the southern edge of the existing built-up area of Stoke Mandeville settlement with the purpose of restricting any further development from occurring on land outside the boundary beyond that which is currently allocated or permitted.
- 5.3 Paragraph 23.3 of the SMNP sets out the justification for the new boundary, and states:
- "This policy aims to:*
- Limit development to the housing allocations in the made VALP 2013-2033 in order to provide further protection for agricultural and other greenfield land which provides green space around the main settlement and the allocated housing sites.*
  - Protect the views across the Chilterns for residents on the south side of the village.*
  - Preserve the public amenity of the rural landscape and access to green space for all residents using the public rights of way to walk across the fields in the Parish."*
- 5.4 In relation to the first point, development on greenfield land and access to green space are not mutually exclusive objectives - they can be integrated to ensure they can both be delivered on the same site. In terms of agricultural land, neither national nor local policy expressly protects agricultural land for development for its own sake.
- 5.5 On the second point, it is wholly inappropriate to seek to use planning policy to maintain or safeguard the vested interests of a particular group of individuals. This is not only contrary to national policy (paragraph 11a) and local policy (Policy S1) both of which advocate the achievement of sustainable development, it is arguably unfair to those other residents living elsewhere in the parish and owners of land within the parish and the district, who do not currently live in this part of the village, but who nonetheless may be in need of suitable housing.
- 5.6 Furthermore, the Chilterns Area of Outstanding Natural Beauty (AONB) is not located within the neighbourhood plan area, and there is existing development that lies closer to the AONB than the line of built-up development looking southwards from the settlement. Limiting growth on land at a greater distance to simply protecting existing views has not been evidenced.
- 5.7 On the third point, it has not been shown in any part of the SMNP or the supporting evidence that promoting public amenity and access to the adjacent countryside can only be achieved through

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<sup>12</sup> NPPF 2023, paragraph 31

defining a new, tightly drawn boundary around Stoke Mandeville settlement. As illustrated below, there are numerous public rights of way along the southern side of the settlement that allow people to access the wider countryside. Accessibility to the countryside in this part of the parish will not be undermined or prevented should a settlement boundary not be defined.

**Figure 5-1 Public Rights of Way Map – Stoke Mandeville**



Source: [Public Rights of Way - Public rights of way map \(buckscc.gov.uk\)](http://publicrights.ofwaymap.buckscc.gov.uk)

5.8 Paragraph 23.5 of the SMNP states:

*“There have already been speculative planning applications for development in areas south and south-east of Stoke Mandeville Village which are not included in the VALP Housing allocations, and this Policy aims to add weight to the VALP in providing further protection for that agricultural land which provides green space and views across the Chilterns for residents on the south side of the village, and also for residents using the public rights of way to walk across the fields.”*

5.9 Nonetheless, paragraphs 7 and 11 of the NPPF promote the achievement of sustainable development, but it does not define sustainable development as only being achievable on sites allocated in the development plan and neither does the NPPF preclude development on unallocated land.

5.10 As highlighted in the previous section, SMPC should also have had regard to the emerging BLP and the fact that Stoke Mandeville settlement is designated as a 'Larger Village' under strategic Policy S2. It is potentially the case that further growth will be directed to the Stoke Mandeville area to support growth over the period to 2040 (the proposed plan period for the BLP). This has been ignored and the draft policy seeks to apply a blanket restriction on any further housing development beyond those sites already allocated or permitted within the area. The result could be that the policy becomes out of date very quickly or conflicts with an emerging strategic policy. This is not the purpose of the neighbourhood planning process, which should complement current policy and be suitably responsive to emerging strategic policy.

5.11 Taken together, the SMNP has not had regard to national policy which promotes the achievement of sustainable development and does not establish any outright prohibition on development simply

because it is located beyond a settlement edge. In addition, for the reasons set out above, the justification given in the SMNP for defining the new settlement boundaries is considered to be inadequate. **The policy fails the basic conditions (a) and (d).**



## 6 POLICY CF1: EDUCATIONAL FACILITIES

- 6.1 This policy relates to AGT-1 and AGT-2 and the provision of new education facilities to meet the demand generated from that developments, which the SMNP acknowledges (at paragraph 25.4) will address the education demand generated by those specific developments. However, as drafted, it could be interpreted that this criteria are relevant to all development on other non-allocated sites. As the policy appears to be specifically related to the AGT allocated land, any further development outside these allocated sites would only be required to make contributions commensurate with the education demand generated by those developments, in line with paragraph 57 of the NPPF which outlines the scope of developer contributions.
- 6.2 In addition, this is also a negatively worded policy framed along the line of a 'Grampian' condition. The policy, as drafted, seeks to restrict the sale of new homes until the new schools have been 'built and ready for use' and that conditions must be agreed between the LEA (BC) and the applicant pursuant to this. It is wholly unreasonable to require a development to effectively deliver new education provision up front without any consideration of how this would impact on overall economic viability of development, contrary to paragraph 34 of the NPPF. This also goes beyond the requirements in the adopted strategic policies of the development plan.
- 6.3 As a consequence, the manner in which this policy is framed is particularly onerous on any potential developer bringing forward residential development within the SMNP area and provides no flexibility to allow for the educational needs of new resident children to be met through alternative means prior to completion of the new schools. Furthermore, the policy provides no evidence which demonstrates that the proposed requirements would not undermine the deliverability of development, contrary to national policy.
- 6.4 Furthermore, the policy would require any new development to '*meet the educational requirements (whether inside or outside the parish)*'. Again, this is wholly unreasonable and goes beyond the scope of three tests when seeking planning obligations as set out in national policy (para 57 and footnote 24) and under the CIL Regulations 122(2).
- 6.5 Taken together, the policy is confusing and has not paid sufficient regard to national policy outlined above. Similarly, the policy goes beyond the scope of the strategic policies of the development plan and would potentially obstruct or delay the achievement of sustainable development and the delivery of much needed housing in the district. **The policy consequently fails the basic conditions (a), (d) and (e).**
- 6.6 RPS recommends the policy is deleted.
- 6.7 Alternatively, if the Examiner is minded recommending retaining the policy, RPS suggests the following modification should be made (new text in *underline*):
- 'Development proposals within AGT-1 and AGT-2 which will result in the completion..'*

## 7 POLICY CF2: MEDICAL AND PHARMACEUTICAL FACILITIES

7.1 This policy is positively worded and is permissive in nature and scope where certain criteria are met. In general terms, the policy supports *'an increase in community medical facilities capacity within the parish or in an immediately adjacent parish where there is support from the Buckinghamshire NHS Healthcare Trust or CCG for its implementation'*. Where on-site provision within the parish is not possible, the second criteria seek a *'commitment'* from developer to *'fund new medical facilities capacity within the parish or within an immediately adjacent parish'*. Consequently, this policy seeks to establish a wide scope for new health care provision for people living within the SMNP area.

7.2 Paragraph 26.1 of the SMNP states that

*"Current local medical services are oversubscribed and are failing to provide the service the community requires. There are currently no general practitioner, dental or pharmaceutical services located within Stoke Mandeville Parish."*

7.3 However, the evidence set out in the Public Facilities Paper (PFP) does not support this assertion. Notably, Annex 5 of the PFP lists a number of medical practices accessed by residents of Stoke Mandeville, which states:

*"The websites of all practices currently (December 2019) state that all practices are accepting new patients."*

7.4 This statement would seem to contradict the earlier statement that services are 'oversubscribed'.

7.5 Similarly, Annex 5 also mentions the national average ratio of patients to GPs as a comparison with local rates. However, this does not in itself justify the need for additional medical facilities for current or future residents of the parish.

7.6 In this context, any non-strategic policy within the SMNP that seeks additional contributions towards community and social infrastructure must accord with national policy and strategic policies dealing with infrastructure contributions in the district. All policies related to planning obligations must accord with paragraph 57 (and footnote 24) of the NPPF and the three tests under CIL Regulations.

7.7 Policy S5 (Infrastructure) of the VALP states that:

*"All new development must provide appropriate on- and off-site infrastructure (in accordance with the Infrastructure Delivery Plan) in order to:*

*a. avoid placing additional burden on the existing community*

*b. avoid or mitigate adverse social, economic and environmental impacts and*

*c. make good the loss or damage of social, economic and environmental assets.*

*In planning for new development, appropriate regard will be given to existing deficiencies in services and infrastructure provision. Development proposals must demonstrate that these have been taken into account when determining the infrastructure requirements for the new development."*

- 7.8 The adopted VALP provides a suitable basis for determining the need for new or enhanced infrastructure at the planning application stage. Any contributions sought through Policy CF2 of the SMNP can only seek to address additional demand generated through new development, and not require contributions to address existing shortfalls in current provision (apparent or otherwise). Any contribution must be necessary, directly related to development, and fairly and reasonable related in scale and kind to the development, in line with national policy.
- 7.9 To seek a 'commitment' to funding new facilities as a matter of principle goes beyond the requirements set out in the strategic policies and has no regard to national policy dealing with developer contributions. Furthermore, the evidential basis for such a 'commitment' has not been adequately justified. **Policy CF2 fails the basic conditions (a and e).**
- 7.10 Consequently, the draft policy needs to be substantially rewritten or, preferably, deleted.

## 8 POLICY TT1: ACTIVE TRAVEL

8.1 The first paragraph of the policy requires:

*"Proposals for Major Development within the NDP area must provide a detailed Travel Plan."*  
(RPS emphasis)

8.2 Paragraph 117 of the NPPF already encourages the preparation of travel plans at the planning application stage where development will 'generate significant amounts of movement'. It states:

*"All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed."*

8.3 Policy T4 of the VALP (at Table 18) defines the thresholds at which travel plans are required, and which simply refers to the necessity for a travel plan under certain circumstances. The term '*detailed*' as drafted in Policy TT1 is arbitrary, subjective and arguably unnecessary, and is also not defined in the policy. The use of said term is unjustified and lacks sufficient precision to be effective for the decision-maker at the planning application stage, which does not accord with the requirement under paragraph 16 of the NPPF for policies to be '*clearly written and unambiguous, so it is evident how a decision maker should react to development proposals*'. In this way, the policy does not accord with national policy and without sufficient clarity undermines the achievement of sustainable development.

8.4 On this basis, as written, **the policy fails the basic conditions (a), (d) and (e)**. RPS recommends the word '*detailed*' should be deleted from the policy.

## 9 POLICY TT2: TRAFFIC CONGESTION

9.1 The first paragraph of the policy states:

*"Development proposals which include measures and contributions to improve traffic flow or reduce traffic through Station Road and Lower Road at peak times will be supported. These measures and contributions should be outlined in detail in a Travel Plan with a clear implementation timescale and funding for measures and guarantees that measures are in place before houses can be sold on the development."*

9.2 The reference to *'in detail'* mirrors the use a similar caveat 'detailed' proposed under Policy TT1, which RPS has objected to. Along these lines, RPS objects in principle to the use of the term *'in detail'* in relation to travel plans under Policy TT2; the basis for the objection is the same and is provided in our response to Policy TT1. However, Policy TT2 also seeks to impose a blanket restriction on the sale of any new homes which do not first provide details on funding arrangements and guarantees that measures will be in place prior to sale (of any dwellings).

9.3 Practice guidance provides a considerable amount of advice for local authorities and neighbourhood planning bodies on the scope and content of travel plans. It states:

*"Travel Plans should where possible, be considered in parallel to development proposals and readily integrated into the design and occupation of the new site rather than retrofitted after occupation."* (PPG ID-042-003) Paragraph: 003 Reference ID: 42-003-20140306 Revision date: 06 03 2014

9.4 On this basis alone, it is unreasonable and not necessarily helpful to stipulate the full implementation of travel plans prior to occupation (which can only happen after a property is sold directly to an occupier, or sold to a third party, for example a registered provider).

9.5 In terms of their preparation, paragraph 117 of the NPPF makes clear that travel plans are an important part of the planning application process. Practice guidance advises that:

*"The anticipated need for a Travel Plan should be established early on, preferably in the pre-application stage but otherwise within the application determination process itself.*

*Consideration should be given at the pre-application stage to:*

*the form and scope of the Travel Plan;*

*the outcomes sought by the Travel Plan;*

*the processes, timetables and costs potentially involved in delivering the required outcomes (including any relevant conditions and obligations);*

*the scope of the information needed; and*

*the proposals for the on-going management, implementation and review processes."*

(Paragraph: 010 Reference ID: 42-010-20140306 Revision date: 06 03 2014

- 9.6 The advice from both national policy and guidance is clear - travel plans are a matter for the planning application process.
- 9.7 Similarly, Policy T4 of the VALP (Table 18) defines the thresholds at which a travel plan will be required, which are to be considered and applied at the planning application stage. This is entirely sensible given the specific issues of relevance to a travel plan will not be known until development proposals have reached a certain level of detail and have been subject to the necessary discussion and engagement between parties, ideally at the pre-application stage. Any specific requirements in terms of outcomes, timescales, and costs are more appropriately a matter for relevant conditions and obligations. Seeking to pre-determine the scope of travel plans through the neighbourhood plan clearly contradicts the nature and purpose of the advice in the strategic policies.
- 9.8 Furthermore, travel plans can only impose requirements where these are consistent with government policy on planning obligations (Paragraph: 011 Reference ID: 42-011-20140306 Revision date: 06 03 2014) as per paragraph 57 of the NPPF. The requirement for *'clear implementation timescales and funding for measures and guarantees that measures are in place before houses can be sold on the development'* as drafted in Policy TT2 is wholly restrictive, unreasonable and unjustified, and goes beyond the legal tests under the CIL Regulations as framed in national policy.
- 9.9 On this basis, Policy TT2 fails the basic conditions (a), (d), and (e).
- 9.10 The third paragraph of draft Policy TT2 then states that:
- "And measures should include:*
- Provision of two vehicle access points to any development of over 200 houses to avoid traffic congestion from commuter traffic in rush hour."*
- 9.11 The strategic policies in the VALP do not prescribe any particular number of vehicular access points related to the number of dwellings to be delivered as part of new development. Paragraph 114 of the NPPF advises that applications for development should ensure that *'safe and suitable access to the site can be achieved for all users'*. The SMNP transport-related policies are supported by a Roads and Infrastructure Paper (RIP). The RIP provides no evidence to justify the inclusion of criteria which should specify thresholds for the number of vehicular access points to be provided on new developments. The criteria, as drafted, is overly prescriptive and is not justified on available evidence. The criteria are not in general conformity with the strategic policies of the development plan and regard has not been had to national policy. **Policy TT2 fails the basic conditions (a, d, and e).**

## 10 POLICY H1: HERITAGE PRESERVATION

10.1 The first paragraph of the policy states:

*"Any development proposed on, adjacent to or which may have any impact on the views or setting of a Designated or Non-Designated Heritage Asset must demonstrate that the community benefit of such a development outweighs the harm done to the Asset or Assets affected, in order to be supported."*

### Proposals affecting heritage assets.

10.2 Paragraph 194 of the NPPF requires an applicant to describe the 'significance' of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. It is unclear what the evidential basis is for the specific aspects in the draft policy highlighted above. The approach in national policy to the assessment of impact on heritage assets at the planning application stage is clearly one that is based on 'proportionality' and any potential impacts should focus on the 'significance' of the assets identified.

10.3 The draft criteria in Policy H1, as highlighted above, seeks to treat all heritage assets in the same way. It is written as a blanket policy applicable to all heritage assets regardless of their importance or significance. This approach disregards national policy.

10.4 Similarly, Policy BE1 of the VALP is clear that 'significance' is the key factor in judging the heritage impact from new development, including setting:

*"All development, including new buildings...should seek to conserve heritage assets in a manner appropriate to their significance, including their setting...". (RPS emphasis)*

10.5 It is clear that Policy H1 ignores this important and necessary caveat by going beyond the strategic policies of the development plan.

10.6 For these reasons alone, the policy has not had due regard for national policy and is not in general conformity with the strategic policies of the development plan, and so **fails the basic conditions test (a) and (e)**.

### Considering potential impacts

10.7 Paragraphs 205-209 of the NPPF establishes the policy tests for considering the potential impacts on designated and non-designated heritage assets resulting from new development. Paragraphs 205 to 208 deal with designated heritage assets; paragraph 209 covers non-designated heritage assets.

10.8 It is critical that any policy dealing with potential impacts on the historic environment draws a suitable distinction between these two categories of asset. In this regard, Policy BE1 of the VALP addresses this distinction, by stating , in respect of non-designated heritage assets:



*"Proposals which affect the significance of a non-designated heritage asset should be properly considered, weighing the direct and indirect impacts upon the asset and its setting."*

10.9 There is no specific requirement in the strategic policies to '*demonstrate that the community benefit of such a development outweighs the harm done to the Asset or Assets affected*' as put forward in the SMNP under Policy H1.

10.10 In respect of designated heritage assets, Policy BE1 of the VALP is clear that consideration of 'community benefits' is of particular relevance, stating:

*"The council will:*

*a. Support development proposals that do not cause harm to, or which better reveal the significance of heritage assets*

*b. Require development proposals that would cause substantial harm to, or loss of a designated heritage asset and its significance, including its setting, to provide a thorough heritage assessment setting out a clear and convincing justification as to why that harm is considered acceptable on the basis of public benefits that outweigh that harm or the four circumstances in paragraph 133 of the NPPF all apply. Where that justification cannot be demonstrated proposals will not be supported, and*

*c. Require development proposals that cause less than substantial harm to a designated heritage asset to weigh the level of harm against the public benefits that may be gained by the proposal, including securing its optimum viable use...." (RPS emphasis)*

10.11 The 'public benefits' balancing exercise when assessing potential impact on significance clearly relates to designated heritage assets. The test for non-designated heritage assets is different. Policy H1 ignores this distinction and so does not have regard for national policy and is not in general conformity with the strategic policies of the development and, by doing so, does not promote the achievement of sustainable development. **The policy fails the basic conditions tests (a), (d), and (e).**

## 11 SUMMARY AND CONCLUSION

- 11.1 RPS has prepared responses to the submission (Regulation 15) version of the Stoke Mandeville Neighbourhood Plan (SMNP) on behalf of Richborough. The responses are made in the context of the basic conditions in accordance with paragraph 8(2) of schedule 4B of the Town and Country Planning Act 1990.
- 11.2 In summary, a number of concerns have been identified, as follows:
- Significant failings in the scope and coverage of issues dealt with in the Basic Conditions Statement (BCS), notably an incorrect approach taken with regards to national policy and advice, and concerns regarding the explanation provided in the BCS on general conformity of certain draft SMNP policies with the strategic policies of the development plan (VALP).
  - Under Policy Gi3, in proposing new settlement boundaries the SMNP has not had regard to national policy which promotes the achievement of sustainable development and does not establish any outright prohibition on development simply because it is located beyond a settlement edge. In addition, for the reasons set out above, the justification given in the SMNP for defining the new settlement boundaries is considered to be inadequate and ignores the potential for future development to be brought forward in this location through the new Buckinghamshire Local Plan.
  - A number of draft policies, notably Policy CF1 and CF2, are seeking to establish policy requirements for the provision of new community facilities that go beyond the strategic policies (notably Policy S5) and national policy on dealing with developer contributions and are which are not supported by adequate evidence.
  - Certain elements of the transport policies (Policy TT1 and TT2) are not justified and have not had regard to national policy, notably in respect to the preparation of travel plans and proposed thresholds for vehicle access points.
  - The heritage policy (Policy H1) seeks to establish blanket protections for all heritage assets in the SMNP area, regardless of their significance. This goes beyond national policies and the strategic policies of the development plan.
- 11.3 For the reasons set out in this submission, RPS contends that the Stoke Mandeville Neighbourhood Plan **has not met the basic conditions** under paragraph 8(2) of schedule 4B of the Town and Country Planning Act 1990 or regulation 15(1)(d) of the Neighbourhood Planning Regulations 2012.

# STOKE MANDEVILLE NEIGHBOURHOOD PLAN 2021-2033 (REGULATION 14)

Representations on behalf of Richborough Estates

JBB8650.C7785

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12 August 2021

## REPORT

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### Document status

Version	Purpose of document	Authored by	Reviewed by	Approved by	Review date
3	NDP Reps	DO	PH	PH	12.8.21

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### Approval for issue

PH	[PH]	12 August 2021
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## Appendix

1. Vision Document – RE Vision Document – Land to the East of Risborough Road 2019
2. Correspondence with Parish Council

# 1 INTRODUCTION

1.1 This submission is in response to the Stoke Mandeville Neighbourhood Plan (Regulation 14) 2021-2033 ('SMNP') published by Stoke Mandeville Parish Council ('THE PARISH') for consultation. It has been prepared on behalf of Richborough Estates ('RE'), who has an interest in Land East of Risborough Road, Stoke Mandeville ('the Site'). Its initial proposals for the site are summarised in its 2019 Vision Document.

1.2 The land being promoted by RE is shown below.

**Figure 1-1 Land East of Risborough Road Site Location Plan**



1.3 The submission is structured to cover the following broad topics:

- Summary of the SMNP proposals affecting the Site (defined as 'Southern Boundary');
- The justification for the proposals for the Southern Boundary.
- Consultation and engagement on the emerging proposals for the Southern Boundary.
- Deliverability of the proposals

1.4 Following receipt of this submission, RE would welcome further discussions with the Parish on the emerging proposals with respect to the Site.

## 2 PROPOSALS FOR THE SOUTHERN BOUNDARY SITE

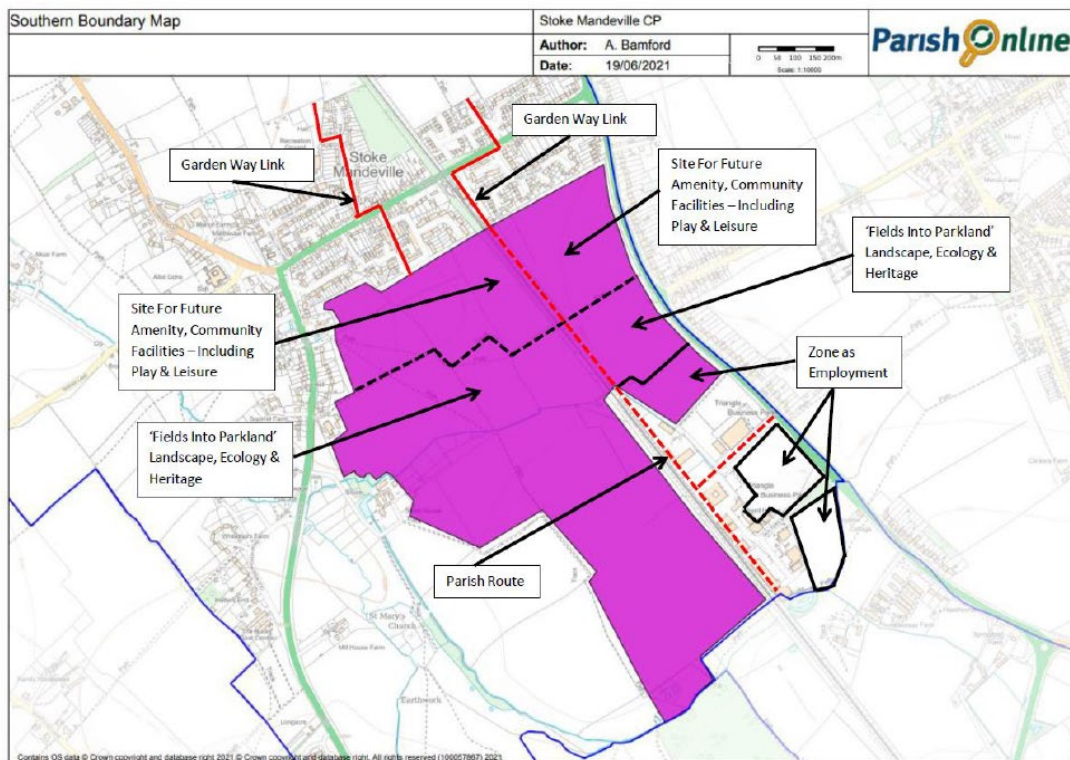
### Plan Structure

2.1 The plan is made up of a series of policies, described as ‘keynote’ and ‘supporting’. The keynote policies are based on a breakdown of the Parish into sub-areas, that the Parish describe as comprising a ‘Parish Masterplan’. A number of supporting policies are also included which relate to more generic topic areas. The policies when taken together, the Parish claim, will achieve the vision for the Parish, and which form the route map for moving from the Stoke Mandeville of today to the Stoke Mandeville of the Future.

### Keynote Policies for Southern Boundary (SB)

2.2 Section 5 of the SMNP presents the policy approach with respect to the proposed Southern Boundary (SB). The approach comprises six proposed policies. The policies are accompanied by a proposals map, which is represented below (the site is shaded in purple).

**Figure 2-1 Southern Boundary Proposals map**



2.3 In summary, the SMNP proposed to allocate the SB site for the following uses:

- Policy KPSB1 – the policy does not support residential development on the site. The majority of the site is allocated for ‘landscape and leisure use’.
- Policy KPSB2 – proposed to allocate the site for ‘ecology, landscape and heritage’ use with the intention that it should be primarily used to substantially increase biodiversity over



time by such measures as the conversion of fields to parkland, the planting of new woodland and the creation of other species-rich habitats.

- Policy KPSB2A – proposes the allocation of additional land adjacent to the business park for ‘business and employment’ use (duplicates Policy KPSB3).
- Policy KPSB3 – proposes the allocation of additional land for ‘employment and business’ (duplicates Policy KPSB2A). Proposes to allocate land for ‘community facilities including a large park’.
- Policy KPSB4 – proposes the allocation of land for ‘community facilities and community use’, with the intention that over time it should be acquired and used to provide appropriate community facilities such as ‘a major new park’ appropriate to a Garden Parish, with landscape features, planting and trees, green open space, natural play areas, and water features.
- Policy KPSB5 – supports the creation of a number of ‘non-vehicular routes’ across the SB site.

2.4 The supporting text (on page 25) that precedes the proposed policies seeks to establish the reasoned justification. It states:

*“Given the clearly-evidenced need for land in the Southern Boundary to be used primarily for landscape and ecology and community/amenity use to redress loss or deficiencies elsewhere in the parish, and given the existence of two very large strategic housing sites within the parish, it is both inappropriate and unnecessary for any further land to be developed for housing within the Southern Boundary.”* (RPS emphasis)

2.5 Consequently, the Parish has based its approach, including its rejection of any further housing development in Stoke Mandeville, very much in response to what is claimed an apparent need for the uses highlighted above. RPS has therefore assessed the evidence base published in support of the SMNP with respect to the justification for the uses proposed. This is addressed in the next chapter.

### 3 JUSTIFICATION FOR THE PROPOSALS

3.1 National policy is very clear that the justification relied upon by plan-makers when preparing their plans needs to be robust. Paragraph 31 of the NPPF (2021) clarifies:

*"31. The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals."* (RPS emphasis)

3.2 As highlighted, the need for proper justification applies to policies in all plans, including those proposed in neighbourhood plans.

3.3 In this regard, RPS has assessed the various evidence base documents relied upon by the Parish to underpin the policies for the SB site. These are addressed in turn.

#### **Biodiversity & Climate Change Evidence Paper [EBCC]**

3.4 This evidence paper looks at biodiversity within the Parish and future issues, which the Parish claim need to be taken into account in the Plan. The EBCC therefore provides the key evidence to inform the proposal to allocate part of the SB site for landscape and ecology purposes.

3.5 In terms of biodiversity, part 1 (section 2) of the EBCC states that

*"Biodiversity has diminished greatly in recent years, with the huge increase in housing within the Parish...."*

3.6 However, the next paragraph of the paper goes on to contradict this by stating that,

*"... Recent surveys by Bucks County Council (now Buckinghamshire Council) (BBONT and RSPB), show a fairly wide range of both fauna and flora within the Parish (See list in Annex 1)...."*

3.7 Annex 1 of the EBCC provides an extensive list of fauna and flora recorded in the area, suggesting that the Parish is not unduly deprived of biodiversity. Therefore, on the basis of this evidence, there does not appear to be a pressing problem or evidential basis with respect to the presence of biodiversity in the Parish, even when taking account development coming forward in the area. It should also be noted that any development coming forward would itself have incorporated appropriate mitigation, including the provision of 'measurable net gains consistent with the aims of national policy (NPPF 2021, paragraph 180). A requirement for 10% Biodiversity Net Gain (BNG) will become mandatory on all relevant developments once the Environment Bill is eventually enacted. Given the requirements for ecological mitigation of the two existing development sites, this cannot be cited as a basis for inappropriately putting private land to such uses.

3.8 Part 7 of the EBCC then presents a commentary on animals (fauna) within the area. The map on page 10 shows the presence of 'notable species' recorded as present in the area, recorded in 2011 by Aylesbury Vale District Council (now Buckinghamshire Council). The Parish nevertheless

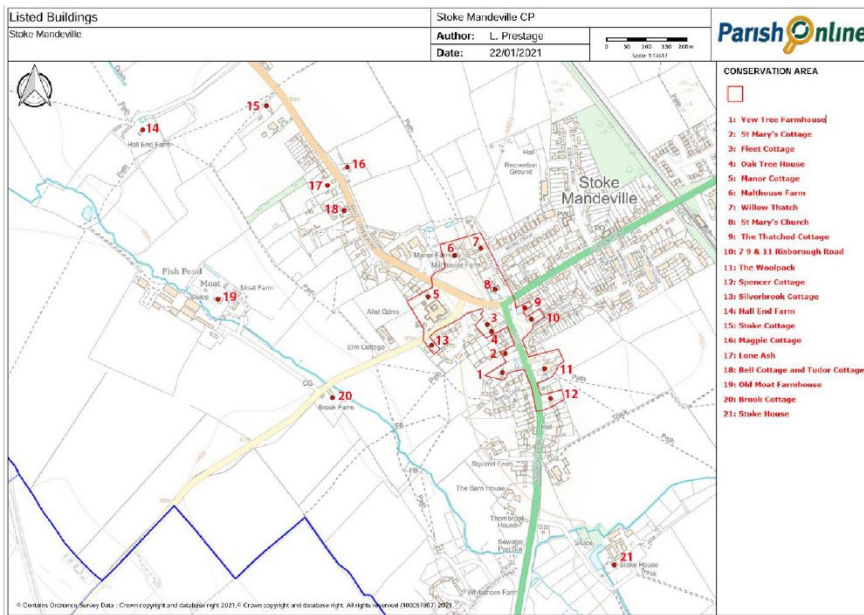
claims that there has been a decline in the animal population in the Parish, with reference to more recent reports published by AVDC in 2015 in relation to the emerging HS2 proposals. This clearly forms the basis for the justification for the allocation of the SB site for biodiversity purposes.

- 3.9 However, on reviewing the evidence it is apparent that no more recent data or analysis of the animal population recorded in the area has been undertaken since 2015 by the Parish to support its position. It should also be noted that animal populations can decline for other reasons unrelated to new development, for example, due to disease or predation. Furthermore, even if the population has declined, the evidence presented does not demonstrate this to be so unacceptable to justify a specific allocation in the SMNP.
- 3.10 Consequently, RPS does not consider the evidence presented is robust, given it is now 6 years old, contradictory in nature, and does not consider other relevant factors that could impact on the presence of wildlife in the Parish.
- 3.11 Similarly, part of the High Speed 2 (HS2) line will run through the south-western part of the SMNP area. Whilst the construction of HS2 is therefore likely to create some disruption to local communities, HS2 could also offer the potential for enhancements to local biodiversity in the area through projects supported by the new Community and Environment Fund (ECF) created to add benefit to communities living along the route. This could not only help to offset the potential impact from new development in the area but increase biodiversity locally.
- 3.12 In terms of landscape, part 6 of the SMNP (section 8, page 6) indicates that Stoke Mandeville is located in an area that exhibits 'low landscape sensitivity' to development. Consequently, landscape is not a factor that justifies the need for the allocation of the Southern Boundary for landscape purposes.
- 3.13 On the basis of the foregoing analysis, RPS does not consider an evidential basis exists to justify the allocation of the Southern Boundary site for biodiversity or landscape reasons.

### **Conservation Areas (ECA) and Heritage assets (EHA) Evidence Papers**

- 3.14 After reviewing this evidence, the SB site is not located within any designated conservation area and does not include any designated or non-designated heritage assets. The SB site therefore does not have any recognised intrinsic heritage value. RPS does acknowledge the presence of three Grade II listed buildings (The Woolpack, Spencer's Cottage, and Stoke House) situated on the western and southern boundary of the site, as shown on page 11 of the EHA paper. Nonetheless, no evidence is presented specifically to demonstrate that the SB site has any special historic or architectural significance that would justify its designation for 'heritage' purposes, which warrants the whole of the SB site.
- 3.15 Furthermore, RPS also notes the intention for the Parish to apply for conservation area status for part of Stoke Mandeville, which would lie partly to the west of the Southern Boundary site. The plan below shows the redline of the proposed area and the nearby heritage assets.

**Figure 3-1 Heritage Assets in Stoke Mandeville (taken from evidence paper ECA)**



- 3.16 National planning policy (NPPF, 2021 paragraph 190) makes clear that when considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its ‘*special* architectural or historic interest’, and that the concept of conservation is not devalued through the designation of areas that lack *special interest*.
- 3.17 In arguing that the village centre of Stoke Mandeville is worthy of designation as a conservation area, the Parish Council places great weight on the “...*historic significance of this road junction in the development of commerce within the county, its virtually unchanged layout, its longevity (over 200 years)...*” (paragraph 22 of the ECA paper). However, it is evident that when comparing the current road layout shown in Figure 3-1 with the image shown at paragraph 24 of the ECA paper that the road layout in Stoke Mandeville centre has changed markedly over the last 200 years and has not remained ‘virtually unchanged’ during that time. This includes the significant realignment of Lower Road as well as alterations to Risborough Road where it connects with Station Road. Whilst it may be true that some buildings have existed in the village during the last 200 years and are worthy of individual protection, it is not true to suggest that the area as a whole has remained virtually unchanged over that time and, as such, its longevity as suggested by the Parish must be questioned. This clearly undermines the case that the village centre has the requisite ‘special architectural or historic interest’ to justify conservation area status.
- 3.18 It should also be noted that any decision to designate a conservation area is the responsibility of the Aylesbury Vale (now Buckinghamshire Council) or, in exceptional cases, Historic England. According to records available on Vale of Aylesbury’s District Council’s website, there are 83 Conservation Area designated in the district, the majority of which were designated during the 1980s and 1990s. Stoke Mandeville was not one of those areas considered at the time worthy of such designation. Whilst a small number of conservation areas have been identified since that time, it is reasonable to suggest that those areas worthy of conservation status in the district have

already been identified. Therefore, there is no guarantee that either such a process will occur or indeed that a conservation area will be designated in Stoke Mandeville.

3.19 Therefore, in RPS opinion, this cannot constitute evidence to justify the allocation of the SB site for 'heritage' reasons.

3.20 Consequently, based on the above analysis, RPS does not consider an evidential basis exists to justify the allocation of the Southern Boundary site for heritage reasons.

### **Community Facilities Evidence Paper (ECF)**

3.21 In relation to community facilities, including leisure and recreation, the Parish has concluded (at paragraph 2 of the ECF), that:

*" The evidence indicates that the Neighbourhood Plan should include policies covering the following:-*

*a. To support and enhance recreational facilities in Stoke Mandeville, particularly in providing green space for outdoors team sports such as hockey, football, etc.*

*b. To support the development of a Parish centre offering a broad range of community facilities.*

*c. To encourage improvements in connectivity between neighbourhoods within the Parish and between neighbourhoods and the new Parish centre."*

3.22 Therefore, the evidence clearly advocates the provision of new community facilities at a proposed new Parish Centre, which is located on the north-west edge of SM village and is a policy that is being pursued by the Parish through the NDP, under Policy KPPC1. RPS and RE supports this policy approach.

3.23 Furthermore, a review of the evidence indicates that there is adequate provision of play areas and sports pitches for local people living in Stoke Mandeville. Section 4 of the ECF paper identifies a number of locally equipped play areas available for use in the Parish, as well as the provision of outdoor sports pitches at Queen Elizabeth II Playing Fields. RPS therefore suggests there is a no deficit of open space available for use by local people.

3.24 Reference is also made (on page 3 of the ECF) to sports pitch facilities previously available at Buckinghamshire County Council Sports Club, which is considered to be an 'asset of community value' but is currently not in use. Whilst not quantified by the evidence, this currently unused space could be brought back into effective use for the benefit of the local community, leading to the increase in the area of usable open space in the area, without requiring the provision of new space elsewhere, in particular as proposed on the Southern Boundary site. Given the evident support for the facility as community asset, such as an option to bring this facility back into use should be given proper consideration by the Parish.

- 3.25 Therefore, on the basis of the Parish's own findings, the evidence does not point to a clear need for new community facilities to be provided on the Southern Boundary site, in particular for 'play or leisure' purposes.
- 3.26 Consequently, based on the above analysis, RPS does not consider an evidential basis exists to justify the allocation of the SB site for community/amenity purposes, including for play and leisure reasons.

### **Business and Farming Evidence Paper (EBF)**

- 3.27 The Business and Farming Evidence Paper sets out the Parish's reasoning for the proposed allocation for employment land as part of the SB proposals.
- 3.28 The evidence presented by the Parish is set out at paragraph 31 of the EBF. In arguing that additional employment land is needed in the area, the Parish imply that because the number of local job vacancies is low (though noted to actually be higher than other areas of the District nearby) this means that there is insufficient employment opportunities available to local people, thus requiring additional employment to be provided through new development.
- 3.29 RPS notes that SMNP includes an allocation of employment land to the east of the railway line, which is broadly supported. However, it is not clear from the evidence base or the SMNP as to which type of employment use is being sought on this part of the Southern Boundary.
- 3.30 Consequently, the evidence presented by the parish does not adequately clarify which type of employment is needed and so, on that basis, the evidence base should be revisited in order to provide sufficient clarity on the proposed allocation of part of the Southern Boundary for employment use.

### **Conclusions on the evidence**

- 3.31 The Parish claims that there is 'clearly-evidenced need' for land to be allocated in the Southern Boundary for landscape, ecology, community / open space, heritage, and employment use. However, as demonstrated in the analysis above, RPS strongly dispute this claim and does not accept there is such evidence to justify the proposed uses on the site. Therefore, the proposed uses on the Southern Boundary put forward in the SMNP are not justified and should be deleted.



## 4 CONSULTATION AND ENGAGEMENT TO DATE

4.1 National policy (NPPF, 2021) makes clear that plans should be:

*“16. c) be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees...”* (RPS emphasis)

4.2 This includes those parties who have an interest in the development of local areas, including those involved in the development process, notably landowners and promoters.

4.3 As highlighted previously, the proposals for the Southern Boundary have a direct impact on the controlling interests of Richborough Estates and the landowners who are promoting the Land East of Risborough Road. It is therefore essential that the landowners and promoter of the Site are fully engaged by the Parish in moving the proposals forward through the neighbourhood plan.

4.4 Whilst not exactly the same, RE and the landowners consider the designation and allocation of the Southern Boundary to be similar to that relating to the designation of Local Green Space (LGS). This is because the uses proposed are predominantly related to open space use and, as such, are seeking to apply restrictions on development of the Site. Planning Practice Guidance (PPG) advises that the qualifying body, in this case Stoke Mandeville Parish Council, should contact the landowner at an early stage about proposals to designate any part of their land ( Paragraph: 019 Reference ID: 37-019-20140306 Revision date: 06 03 2014). This simply has not happened.

4.5 Unfortunately, there has been no direct engagement with the landowners or their representatives on the preparation of the proposals for the Southern Boundary. RPS is aware that the landowner simply as a local resident was contacted by the Parish for the purposes of general consultation, but has not been engaged on the specific proposals or in relation to the possibility of the Parish acquiring the Site to enable the proposals to be delivered as proposed.

4.6 Similarly, RPS sought (in December 2019) to be put on the mailing list for future correspondence on the emerging neighbourhood plan. However, this was not done and RPS was not informed directly by the Parish of the publication of the SMNP (Attached at **Appendix 2**).

4.7 Paragraph: 047 Reference ID: 41-047-20140306 reads **Should other public bodies, landowners and the development industry be involved in preparing a draft neighbourhood plan or Order?**

*A qualifying body must consult any of the consultation bodies whose interest it considers may be affected by the draft neighbourhood plan or Order proposal. The consultation bodies are set out in Schedule 1 to the Neighbourhood Planning (General) Regulations 2012 (as amended). Other public bodies, landowners and the development industry should be involved in preparing a draft neighbourhood plan or Order. By doing this qualifying bodies will be better placed to produce plans that provide for sustainable development which benefits the local community whilst avoiding placing unrealistic pressures on the cost and deliverability of that development.*

4.8 Paragraph: 048 Reference ID: 41-048-20140306 reads:



*A qualifying body must publicise the draft neighbourhood plan or Order for at least 6 weeks and consult any of the consultation bodies whose interests it considers may be affected by the draft plan or order proposal (see regulation 14 and regulation 21 of the Neighbourhood Planning (General) Regulations 2012) (as amended). The consultation bodies are set out in Schedule 1 to the Regulations.*

- 4.9 From these provisions, it is clear that RE would constitute “*people who...carry out business in the area*”. The SMNP was not brought to RE attention and it plainly should have been. In RPS opinion there has been a direct breach of Regulation 14. The Regulation 14 stage is a very important one in the proper formulation and evolution of the plan. Proper consultation with RE at that stage, should have taken place and would have been an important step.
- 4.10 Unfortunately, it is only following routine monitoring of the planning position in the Aylesbury Vale area that the relevant parties are now aware that this consultation has commenced including the proposals for the Southern Boundary site.
- 4.11 As a consequence, it is arguable whether the engagement undertaken to date by the Parish with the landowning parties has been ‘*early, proportionate and effective*’, as required by national policy.

## 5 DELIVERABILITY

5.1 National policy states that:

*“16. Plans should...b) be prepared positively, in a way that is aspirational but deliverable...”*  
(RPS emphasis)

5.2 Planning Practice Guidance advises on how important it is that plan-makers, including qualifying bodies, ensure plans are deliverable, stating:

***“How should plan makers and site promoters ensure that policy requirements for contributions from development are deliverable? (...)***

*It is the responsibility of plan makers in collaboration with the local community, developers and other stakeholders, to create realistic, deliverable policies. Drafting of plan policies should be iterative and informed by engagement with developers, landowners.”* (Paragraph: 002 Reference ID: 10-002-20190509 Revision date: 09 05 2019 See previous version) (RPS emphasis)

5.3 As summarised in chapter 2 of this submission, the Parish has identified a number of significant proposals with respect to the whole of the Southern Boundary site. These include the conversion of the land to ‘parkland’ and the ‘planting of a new woodland and other species-rich habitats’ (under Policy KPSB2) with specific reference to a ‘large park’ (under Policy KPSB3). Policy KPSB4 also refers to ‘...the intention that over time it should be acquired and used to provide appropriate community facilities such as a major new park...’ (RPS emphasis)

5.4 Whilst these are all laudable aims and objectives, they clearly lack any basis in reality. This is primarily because the Parish is not the landowner and so does not have any rights over the Site or the stated resources to enable delivery of any of its proposals. Without the agreement and consent of the current landowner, there is effectively no opportunity for the Parish to deliver any of the proposals relating to the Southern Boundary site. The policies, as they stand, and therefore unrealistic and undeliverable.

5.5 The SMNP is not taking the opportunity it has to engage with the development industry about the potential for additional housing growth, it is actively looking to stop new housing growth. This is their prerogative. However, in doing so, it should not artificially look to resist or hinder the opportunity for landowners and their agents to promote their land through a formal plan which will be looking to address future housing needs of the area, that being the formal review of the Vale of Aylesbury Local Plan in the form of the Buckinghamshire Local Plan. It is also worthy of note that the Housing & Economic Land Availability Assessment (HELAA) Version 4 published by the local authority indicates that the site (SMD001) is ‘part suitable’ for housing. This shows that the site could be proposed as a housing allocation as part of that emerging plan review.

5.6 Appendix 1 provides RE draft proposals, which are to be submitted to the delayed VALP Review.

5.7 A more appropriate, alternative approach would be for the Parish to work with the landowner and the site promoter in order to deliver a sustainable development that would include a mix of built

and non-built uses comprising new, usable and functional open space and parkland areas for the benefit of the local community. In doing so, this would enable the wider vision and objectives of the SMNP to be realised on the Southern Boundary site.

- 5.8 Consequently, unless these fundamental problems are acknowledged and recognised by the Parish and an alternative strategy progressed for the Southern Boundary site, the current proposals are unworkable, unrealistic, and undeliverable, contrary to national policy and guidance. Without such changes, all the policies (KPSB1-5) should be deleted from the SMNP.

## 6 CONCLUSIONS

- 6.1 Section 5 of the Stoke Mandeville Neighbourhood Plan (SMNP) presents the policy approach with respect to the proposed Southern Boundary (SB). The approach comprises six proposed policies.
- 6.2 The SMNP proposes a number of policies for the Southern Boundary site, which has direct implications for the landowning interests on the Land East of Risborough Road which forms a significant proportion of the proposed allocation. These policies seek to allocate the Southern Boundary for range of open space and community-related uses but excludes residential development. The Parish contend that the uses proposed are based on 'clearly evidenced need' which should preclude any housing development from coming forward on the site.
- 6.3 RPS has considered the content of the SMNP and supporting documents, and draws the following conclusions:
- RPS has assessed the evidence base presented by the Parish which demonstrates that there is no evidential basis for the designations/allocations as proposed.
  - Furthermore, there has been limited consultation with landowning interests on the SMNP proposals, who have different development aspirations for the SB site from those of the Parish Council.
  - It has also been shown that the proposals are not deliverable as the Parish is not in control of the land and so requires the Parish to acquire the land (as recognised under Policy KPSB4). This is clearly unrealistic given the development aspirations for the Site.
- 6.4 In this context, an alternative strategy is proposed that would involve greater collaboration between Parish and the landowning interests on the Site in order to deliver sustainable development that can also assist in achieving the wider aims and objectives of the neighbourhood plan.

Appendix 1 - Vision Document – Land to the East of Risborough Road 2019



L A N D   E A S T   O F  
R I S B O R O U G H  
R O A D

S T O K E   M A N D E V I L L E

SITE PROMOTION DOCUMENT

APRIL 2019

PROJECT CONSULTANT TEAM:

Planning:

RPS Group



Landscape / Arboriculture:

Tyler Grange



Masterplanning:

Richborough Estates



Transport:

Hub Transport Planning Ltd



Flood Risk & Drainage:

BWB Consulting



Heritage:

Pegasus



Ecology:

CSA Environmental



Utilities:

M-EC



Urban Design and Publishing:

Savills Urban Design Studio



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Job Number:	425969
Status	Final
Revision:	M
Author:	Various
Issue Date:	April 2019



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# 1. INTRODUCTION

## THE PROMOTER

1.1 Richborough Estates is a specialist strategic land promotion business founded with the aim of working in partnership with landowners and Local Authorities to deliver housing.

1.2 Our projects are located throughout the country ranging from large urban extensions to sensitively designed residential schemes on edge of settlement sites, similar to the proposals put forward for this Site at Stoke Mandeville.

1.3 Richborough Estates oversees the entire planning process from start to finish and works closely with local communities, Planning Officers, and key stakeholders to create the most mutually beneficial schemes. Richborough is seeking to apply this approach to the proposed development which is the subject of this promotion document.

1.4 Richborough Estates is working with the landowners to promote the approximately 30 hectare site at land east of Risborough Road, Stoke Mandeville (Figure 1). The landowners are fully engaged with the process, and are very keen to see the delivery of a suitable and sustainable development which provides a range of tangible community benefits to new and existing residents of Stoke Mandeville.

1.5 The procurement method employed by Richborough Estates involves the appointment of development partners and we have a proven track record of development commencing quickly following the grant of planning permission.

1.6 In order to evidence the Site's suitability for development, Richborough Estates has commissioned a specialist team of design, environmental and engineering consultants who have undertaken a number of surveys and assessments to consider issues related to landscape and visual impact, drainage and highways. The outputs of these assessments are summarised within this document.

1.7 An indicative masterplan concludes this document to illustrate how the design responds to the outcomes of the assessment work to bring forward a high quality and sympathetic new residential development comprising around 350 dwellings, including extensive landscaped open space and a shared community green space.

1.8 As detailed within this document, the proposed scheme functions well in providing a sustainable growth option for Stoke Mandeville. The Site's location lends itself towards a highly connected development option, offering an enhanced network of pedestrian/ cycle routes with easy access to Stoke Mandeville train station and the village centre.


1.9 What is presented in this document is not intended to be a fully worked-up scheme for Stoke Mandeville. Rather, it has been prepared for illustrative purposes to form the basis for open conversation with key stakeholders, including the local community, Parish Council and Local Planning Authority.

PHOTOGRAPH FROM NORTH WESTERN CORNER OF THE SITE



FIGURE 1: SITE BOUNDARY PLAN



 Site Boundary - Approx. 30.04ha (74.22 acres)



## 2. THE OPPORTUNITY

2.1 Development of the land east of Risborough Road, Stoke Mandeville, provides a unique opportunity to create a new sustainable neighbourhood of the highest design quality. The proposed development can positively respond to both its immediate and wider settlement context to sustainably meet the needs of Stoke Mandeville.

2.2 The proposals put forward are structured around existing landscape features and are built upon the existing movement network to form a highly connected and legible environment. The proposed development can provide a mix of new homes to meet and balance local housing needs, alongside new, publicly accessible green spaces, designed to encourage active and healthy lifestyles, community cohesion and social interaction.

STOKE MANDEVILLE VILLAGE SIGN



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STOKE MANDEVILLE RAILWAY STATION

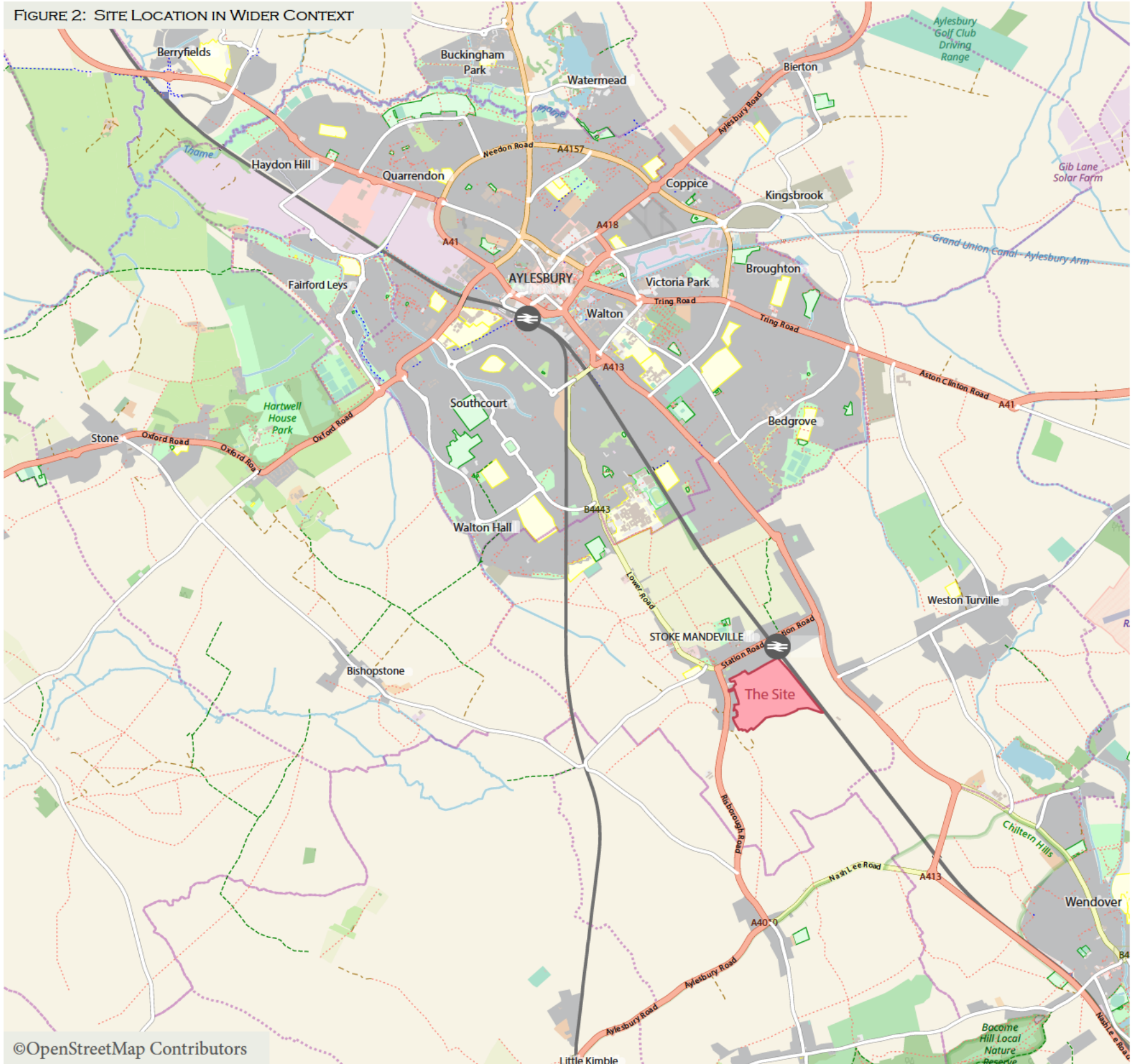


©Nigel Thompson

PHOTOGRAPH TAKEN WITHIN THE SITE ALONG PUBLIC RIGHT OF WAY



FIGURE 2: SITE LOCATION IN WIDER CONTEXT



## 3. WHY STOKE MANDEVILLE?

LAND EAST OF RISBOROUGH ROAD, STOKE MANDEVILLE IS A SUITABLE AND SUSTAINABLE LOCATION FOR A NEW HOMES



### SUPPORTING SUSTAINABLE GROWTH

Within the wider Aylesbury Vale District, Stoke Mandeville is identified as a 'Larger Village'. However in comparison to other large villages within Aylesbury Vale District, Stoke Mandeville offers more opportunity to facilitate sustainable growth. This is largely due to its close proximity to Aylesbury Town and importantly Stoke Mandeville Station, which provides fast access to London and Aylesbury.

Village expansion will help ensure the continued viability and variety of local businesses and facilities.

Given its sustainability credentials, Stoke Mandeville will be integral to the growth options explored by the Council through their Local Plan. The expansion of Stoke Mandeville can form part of a well-balanced spatial strategy and support the District's wider growth requirements. The proposals put forward in this document present opportunities to draw on existing facilities whilst providing significant additional infrastructure benefits to ensure the future vitality of Stoke Mandeville.



### EMBRACING A MORE SUSTAINABLE SETTLEMENT PATTERN

The settlement pattern of Stoke Mandeville is characterised by its original expansion along two primary north-south routes (Risborough Road and Wendover Road) and the latter east-west interlink provided by Station Road. Cul-de-sac developments have occurred off these primary routes. The resulting development impact has created a relatively unconnected and impermeable settlement form.

The severance caused by the Aylesbury - London railway line also compounds the ease of access to existing services at the western end of Station Road/ Risborough Road.

The development proposal put forward looks to improve the settlement pattern by focusing a new critical mass of community in close proximity to local services and the railway station. This will in-turn support the creation of a more nucleated and permeable settlement form, with greater community focus and connectivity to local facilities and services.





## A LANDSCAPE LED DESIGN APPROACH

The proposals will demonstrate a design approach that considers the value and improvement of the Site's landscape context.

The existing hedgerow network and green edges will be incorporated into the scheme to provide amenity, character and a sense of place.

The existing linear settlement pattern of Stoke Mandeville restricts the opportunity to provide well-connected community green spaces. The development opportunity promotes the provision of a new range of publicly accessible green spaces, including a community green, children's play opportunities, orchards and ecological enhancement zones.

By utilising the existing green network the proposed development option offers the opportunity to provide a variation of green assets and spaces to encourage leisure activity and social interaction between existing and future residents of Stoke Mandeville.



## WELL CONNECTED NEIGHBOURHOOD

The convenient availability of train and bus services is a significant asset to Stoke Mandeville and the proposed Site. Together, accessible rail and bus travel offers commutable links to London (Approx. 1hr via train), as well as access to larger regional towns such as Aylesbury and Amersham.

Highly accessible access to the UK Rail networks and regional bus network, as well as immediate access to the A4010 (Risborough Rd), presents an extremely well-connected location for future residents looking to live / work locally, as well as a realistic option for those requiring access to locations further afield.

The surrounding area benefits from an extensive 'Public Right of Way' network, part of which falls within the Site. The opportunity exists therefore to build upon this network to provide optimal pedestrian / cycle activity and encourage healthier, more environmentally friendly travel options.



# 4. PLANNING CONTEXT

## THE LOCAL PLAN

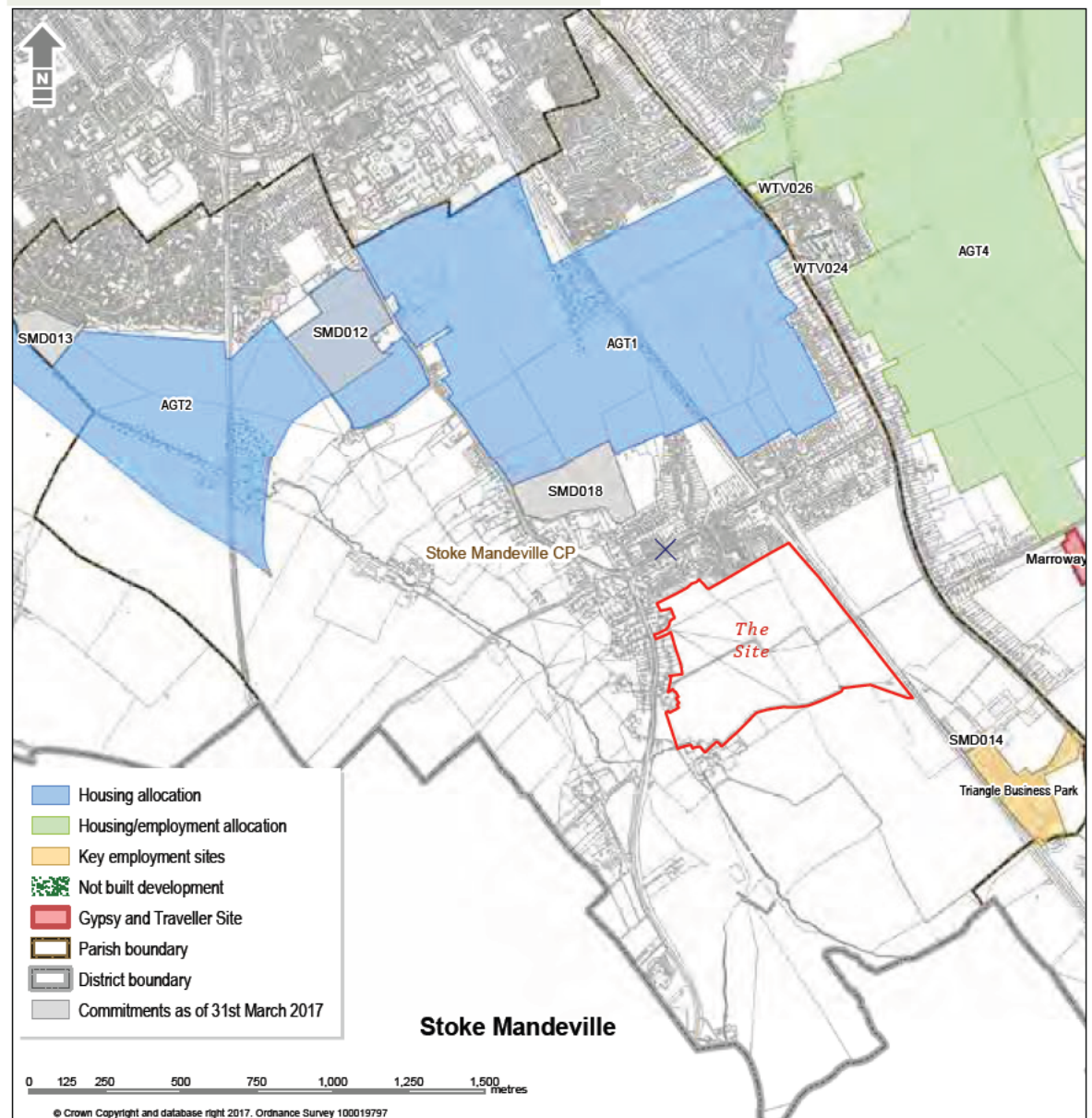
4.1 The emerging Vale of Aylesbury Local Plan (VALP) was submitted for Examination in February 2018 and covers the period between 2013 and 2033. The VALP is now at an advanced stage proceeding through the Examination process.

4.2 Emerging Policy S2 Spatial Strategy for Growth of the VALP states that 27,400 new homes are required during the period up to 2033. To assist with the growth proposals for Aylesbury, Aylesbury Vale was awarded Garden Town status in January 2017, and comprises Aylesbury town and adjacent parts of surrounding parishes (including Stoke Mandeville). The following two sites AGT1 and AG2, as illustrated in Figure 3, were allocated in Stoke Mandeville Parish, to contribute to the VALP housing requirement.

4.3 The VALP Inspector has issued his Interim Conclusions on 29 August 2018, which have found the main components of the Plan sound. However, the Inspector has recognised the strategic role of Aylesbury in the sub-region and in particular the role in achieving the Oxford-Cambridge Expressway, which the Inspector has said needs to be considered through the VALP, to ensure that it can endure, and remain flexible in the future. The Inspector also concluded that the VALP should set a modified housing requirement figure of 31,500 dwellings, with specific allocations to meet 30,600 dwellings.

4.4 Whilst the Local Plan modification process will finalise the VALP, the revised NPPF has set out the approach to the 'Standard Method' to be applied to determine the number of homes needed for the VALP review. Although not directly relevant for this current stage of Plan making, and within the final methodology still

FIGURE 3: STOKE MANDEVILLE VALP ALLOCATIONS





being considered, this provides a good indication of which way the housing need might be going in the future. The current methodology suggests that there will be a very significant up-lift from current requirements.

4.5 As part of the Aylesbury Vale Housing and Economic Land Availability Assessment (HELAA) report January 2017, which informed the VALP Proposed Submission, several sites were considered within Stoke Mandeville including the proposal Site at Stoke Mandeville (SMD001) as shown in Figure 4.

4.6 The Council's assessment considers the Site to be part suitable for housing (approximately 13.3ha to the northern area) if satisfactory access could be achieved. Overall the Site has a deliverable capacity of approximately 300 dwellings as indicated from the HELAA extract (Figure 5).

4.7 Plans for a new Buckinghamshire Unitary Council were announced in November 2018. The County Council-promoted scheme will see it merge with Aylesbury Vale, Chiltern, Wycombe, and South Bucks District Councils. The merger has the support of Secretary of State for Ministry of Housing, Communities and Local Government. If Parliament approves the decision, the new council should be in place by 1 April 2020 and the first elections to the council held on 7 May 2020. This would then most likely lead to the production of a new Development Plan Document for the new unitary authority, guiding future development proposals at Stoke Mandeville.

FIGURE 4: AYLESBURY VALE HELAA REPORT EXTRACT

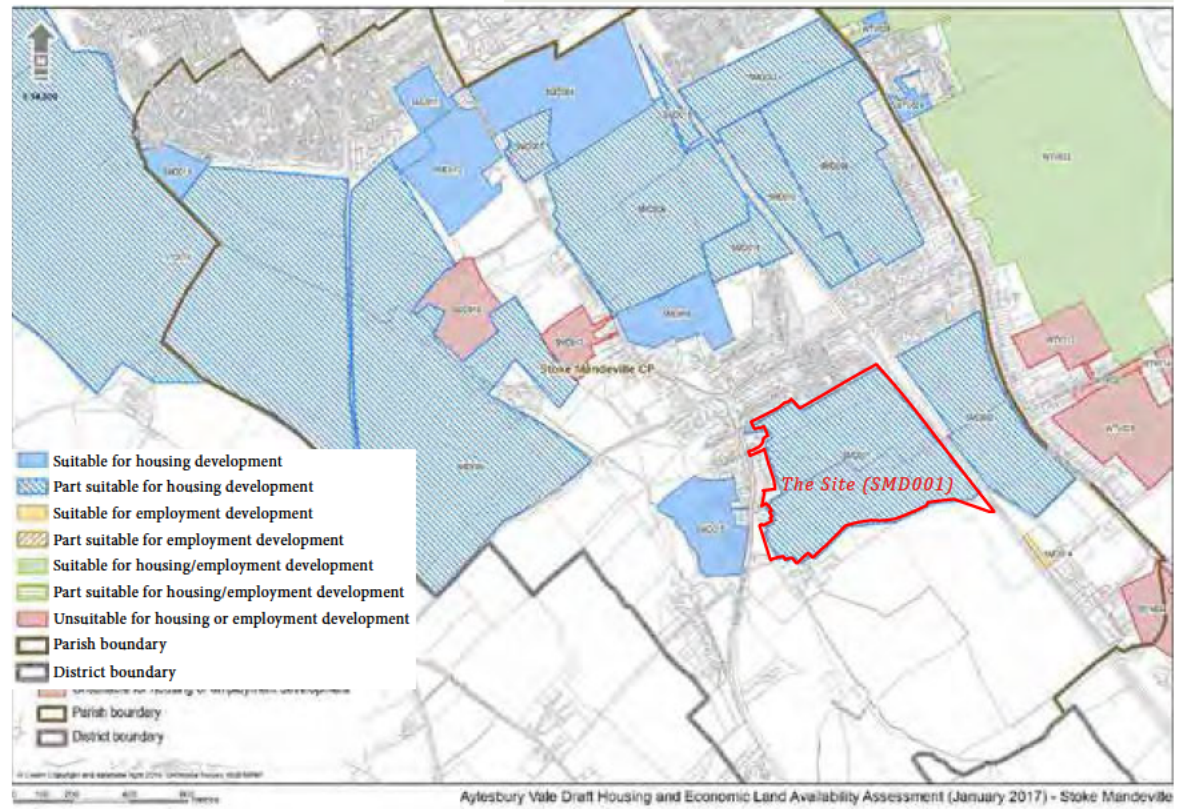


FIGURE 5: AYLESBURY VALE HELAA TABLE EXTRACT

Reference	Site Address	Parish	Site Area (ha)	Site assessment	Achievability	Housing				Economic Development	
						Suitable	Capacity	1-5 Years	6-15 Years	Suitable	Capacity (sqm)
SMD001	Land South of Station Road, East of Risborough Road	Stoke Mandeville	28.8	Part Suitable - Site is part suitable for housing (Approximately 13.3ha the northern part) of the proposed site (anything greater would be out of scale with the built form the village). If satisfactory access can be achieved. Looking at the character of the area the capacity maybe for around 300 homes (around 23dph). Series of arable fields hedges throughout pond on site some mature trees so there will be a need for the detailed layout of buildings to carefully take account of biodiversity and if necessary mitigate and provide buffers. The site is now being promoted through the Call For Sites process.	No	Yes	300	100	200	No	



## THE NEIGHBOURHOOD DEVELOPMENT PLAN AREA

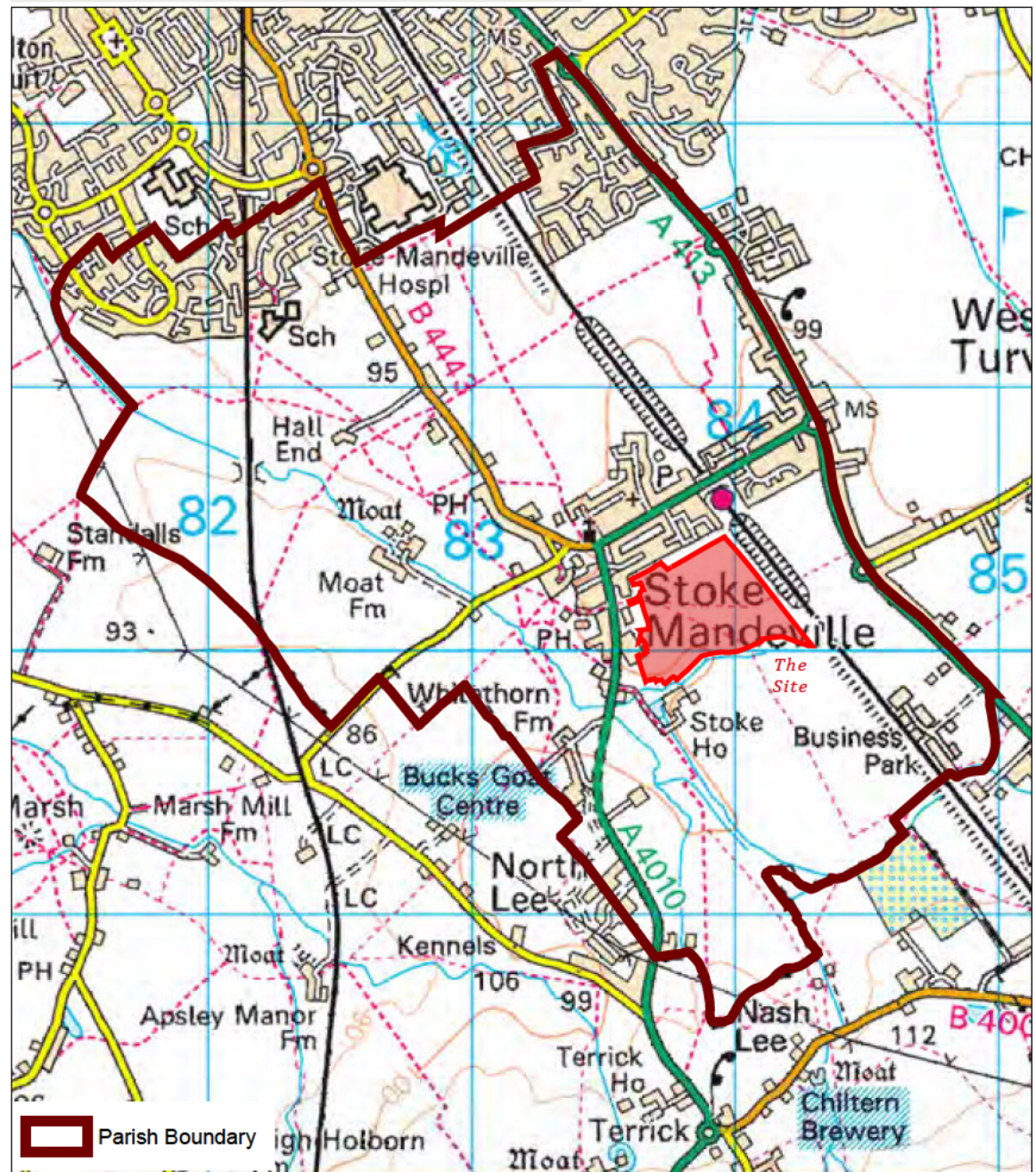
4.8 Stoke Mandeville Parish was designated a Neighbourhood Development Plan (NDP) Area in August 2015. The Parish Council is currently preparing its NDP and two public consultation events were held on 22 and 23 September 2018. The Site is located in an area covered by the NDP.

4.9 Overall, the Site is available now, and housing is deliverable from the Site within the five year period. It is therefore well-placed to accommodate additional housing needs associated with the VALP Inspector's Interim Conclusions. It is additionally, well-placed in the medium to longer term to accommodate housing provision for significantly increased levels of housing growth for the District under the Government's 'Standard Method'.

4.10 As indicated elsewhere within this document, the Site provides a sustainable location that is adjacent to the main settlement and in close proximity to the train station. Focusing delivery at this Site would contribute to the wider aspiration of Aylesbury Garden Town of delivering sustainable growth and can also assist with housing delivery within the Neighbourhood Development Plan area.

4.11 With these proposals being promoted on the southern side of Stoke Mandeville it means that development would occur in a sustainable manner maintaining the important gap to the north between Stoke Mandeville and Aylesbury Town. This would ensure the village avoids any visual or physical coalescence with Aylesbury in the future.

FIGURE 6: STOKE MANDEVILLE NDP AREA





## LANDSCAPE POLICY

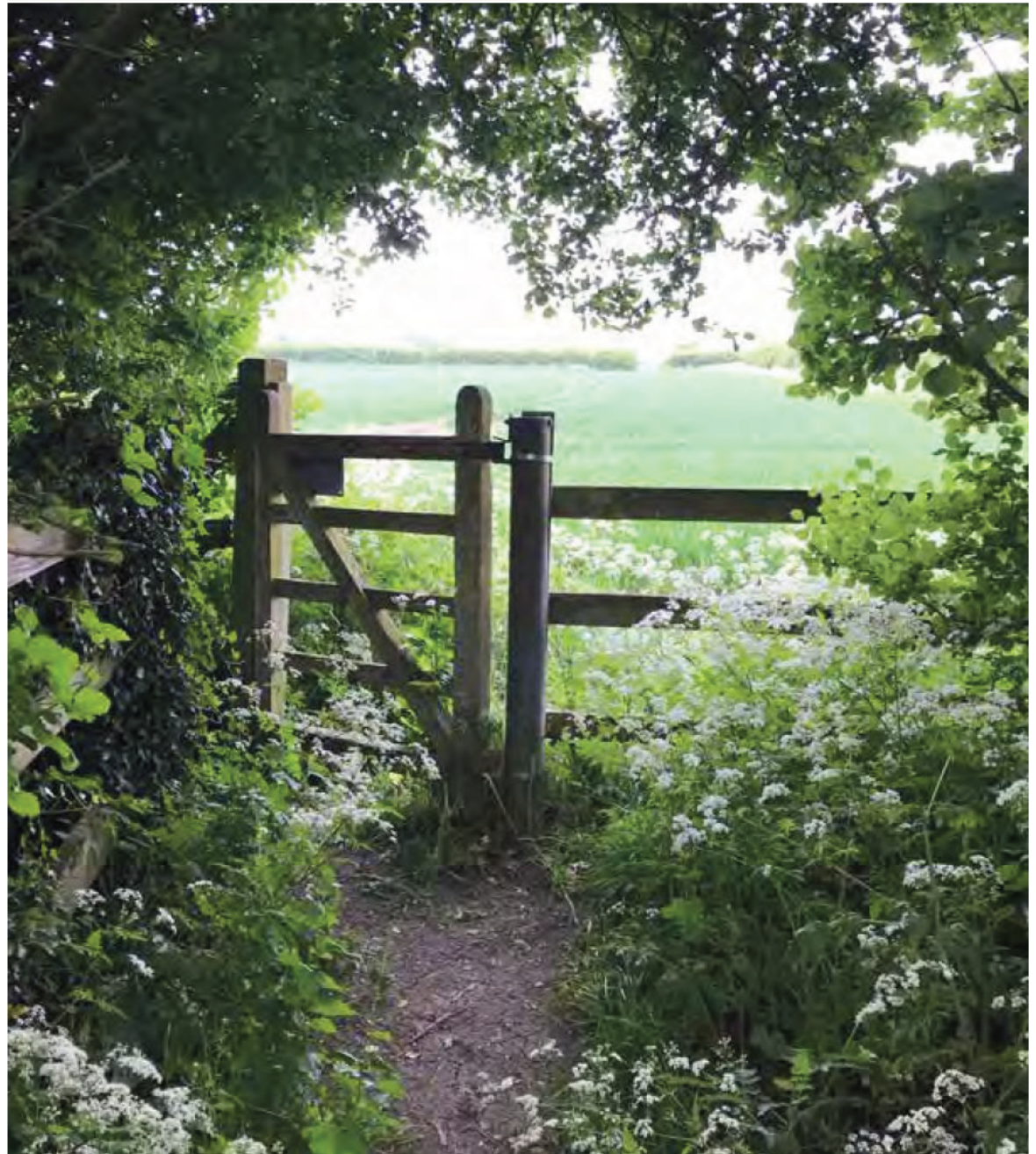
4.12 The Site is not subject to any national or local qualitative landscape designations. The Chilterns (AONB) lies approximately 1.45km to the south.

4.13 A 'Strategic Landscape and Visual Capacity Study' was undertaken by Bradley Murphy Design Ltd (BMD) in August 2017. The purpose of this study was to undertake a strategic appraisal of the capacity in landscape and visual terms, for approximately 100 sites throughout the borough, to identify their suitability for allocation for residential or economic development, or a mix of both.

4.14 The sites subject to the appraisal were selected by Aylesbury Vale District Council (AVDC) from a number of those reported in the Housing & Economic Land Availability Assessment (HELAA), published by AVDC in January 2017.

4.15 The Site is included within this assessment as site reference SMD001. The Site has been assessed to have the potential to accommodate development within 60% of the Site, along the northern boundary and eastern half of the Site against the railway line, retaining distant outward views from properties to the west and the Public Right of Way (PRoW).

SITE PHOTO OF PEDESTRIAN ACCESS ONTO SITE



## 5. SITE & CONTEXT ANALYSIS

*Site and local context analysis has been undertaken to inform the proposed approach to development so as to achieve a well integrated and complimentary development for Stoke Mandeville.*

### SETTLEMENT EVOLUTION

5.1 Figure 7 illustrates a high level assessment of the growth of Stoke Mandeville and establishes some principles for how future growth could be accommodated whilst maintaining / improving the cohesion and function of the settlement.

5.2 The following text provides a brief summary of the village's modest growth from the 19th century to today.

5.3 For the period up to the 1900s a small cluster of dwellings and farmsteads gathered around the site of St. Mary the Virgin Church and marked the origins of the village which saw slow and organic growth.

5.4 The settlement growth focused around the junction between Risborough Road, Lower Road and modern day Station Road. The proximity of the village to Aylesbury placed great emphasis on the importance of Risborough Road and saw linear settlement growth.

5.5 The introduction of the railway line and station to Stoke Mandeville in late 1892 significantly changed the established direction of growth. The focus of growth and activity commenced around the new train station.

5.6 In the pre-war period, the village experienced gradual growth. Growth in this period occurred primarily in three pockets:

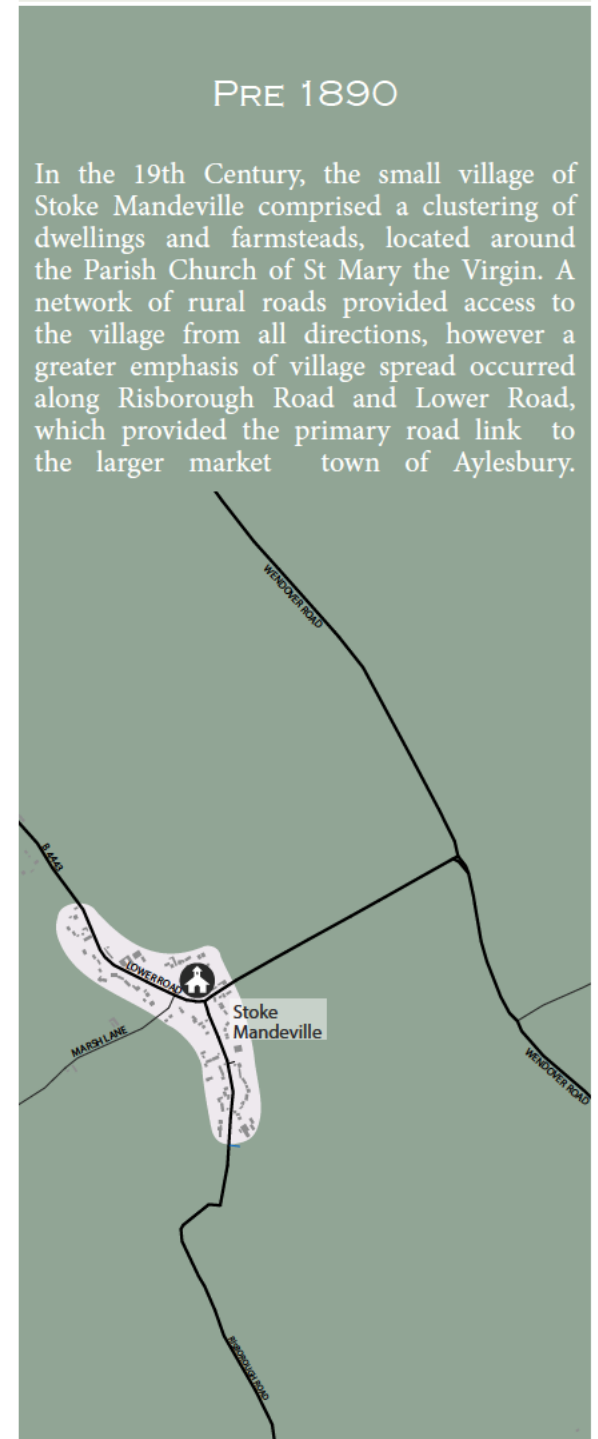
- Risborough / Lower Road - growth became more intensified around the original village core, as well as spreading north along Risborough Road.
- Station Area - cluster growth occurring around Station Road adjacent to Stoke Mandeville Station.
- Wendover Road - with the locational pull of Stoke Mandeville Station and the direct road access to Aylesbury, ribbon development formed along Wendover Road and on parts of Station Road.

5.7 In the early post-war period village growth was again gradual. However with rail modernisation and privatisation in the 1990's the train station began to serve as a renewed catalyst for growth. This change saw the convergence of residential pockets along Risborough Road, Station Road and Wendover Road.

5.8 Development intensification also occurred in this period, with the formation of cul-de-sacs, drawing access from the three primary roads.

5.9 The periodic growth of Stoke Mandeville demonstrates how the village structure has been influenced by functions and wider connectivity. This influence continues to be relevant today. Future proposals should therefore aim to reinforce the village identity whilst providing sustainable development options with close proximity to existing local assets.

FIGURE 7: SETTLEMENT EVOLUTION





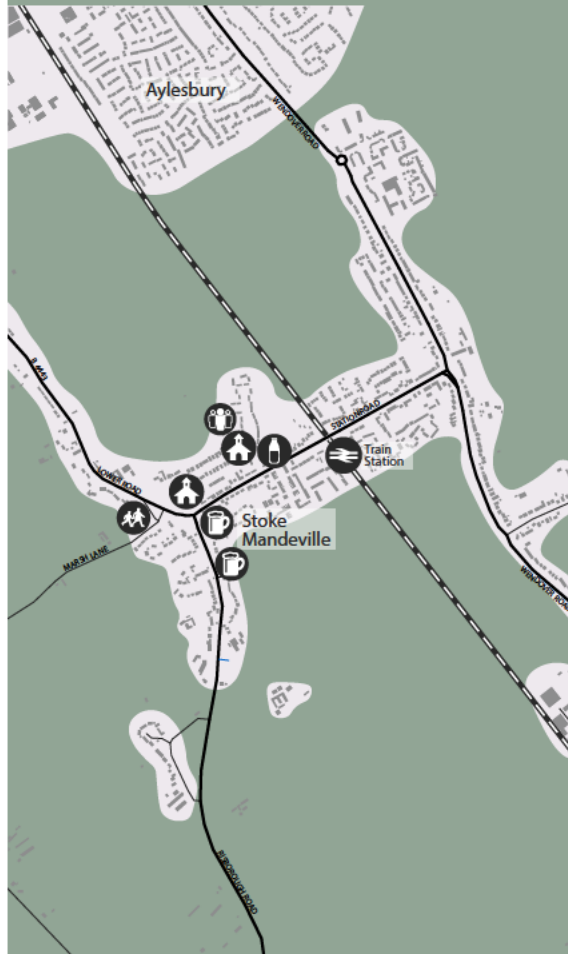
## 1890 - 1945

Pre-World War II saw the introduction of the Aylesbury to London Rail line. Stoke Mandeville Train Station was formed on the newly formalised Station Road. Located equidistant from Risborough Road / Lower Road and Wendover Road, additional linear expansion formed along the primary road networks. The introduction of rail provision altered the influence of growth from the west to east of the village.



## 1945 - PRESENT

As general prosperity increased and population began to rise, more housing was provided, particularly in Aylesbury which extended significantly southwards towards Stoke Mandeville. The increase in homes brought with it a greater need for community/social facilities, the majority of which have formed near the historic core of Stoke Mandeville, west of the Aylesbury to London Rail Line.



## FUTURE GROWTH THOUGHTS

It is important that the current village function and its integrity is retained and enhanced through future growth. The periodic evolution of Stoke Mandeville has caused the settlement to become more dispersed. In light of this, future development proposals located close to the original settlement core whilst staying within the current settlement limits is considered to be a viable and sustainable growth option.



## THE SITE

5.10 The Site is situated east of Risborough Road and south of cul-de-sacs accessed from Station Road. The Site is defined on all four sides by the following features:

- Western Edge - Defined by rear back gardens from properties fronting onto Risborough Road.
- Northern Edge - Defined by rear back gardens from properties off Brudenell Drive, Hampden Close and Chalgrove End.
- Eastern Edge - Defined by the Aylesbury to London Railway Line.
- Southern Edge - Formed by a field brook with well-established hedgerow and trees.

5.11 The Site comprises a series of agricultural fields and extends to approximately 30.04ha (74.22 acres).

5.12 An informal farmland access lane cuts through the centre of the Site, serving the existing Yew Tree Farm. The informal lane runs parallel with parts of the central hedgerow structure.

5.13 A network of Public Rights of Way (PRoW) pass through the Site, running from the north eastern corner below the Woolpack Pub to both the southern edge and eastern edge. An at-grade pedestrian crossing point exists along the railway line at the eastern edge of the Site. Both PRoW continue and connect to the wider and extensive PRoW network.

## VIEWS

The visibility of the Site is influenced by the gentle topography and the surrounding context. To the north and west, visibility is limited by the existing settlement edge associated with Brudenell Drive, Hampden Close, Orchard Close, Chalgrove End and Risborough Road (A4010). To the east, the vegetated railway corridor contains views.

Views are also available from the public footpath that traverses the site from the western boundary (reference: SMA/7/1), which then splits into two footpaths; connecting eastwards to the A413 (reference: SMA/7/2) and southwards towards the B4009 (reference: SMA/6/1).

Beyond the vegetation associated with Stoke Brook and connecting ditch to the south / south-east, views are available to the distant rising ground at Wendover Woods (260m AOD) and also towards Coombe Hill (260m AOD) from the southern portion of the site. However, the local topography does obscure the middle-distance views to and from the south.

VIEW 1



VIEW 2



VIEW 3














VIEW 4





FIGURE 8: SITE & CONTEXTUAL FEATURES



- |  |  |   |   |   |   |
|--|--|---|---|---|---|
|  Site Boundary (approx. 30.65ha) |  Existing Railway Line      |  Existing Public Right of Way |  Southern Brook & Water Bodies |  The Woolpack Pub / Restaurant |  Site Views 1, 2, 3, & 4 |
|  Existing Railway Line           |  St. Mary the Virgin Church |  Existing Farm Track         |  Elm Tree Farm               |  Southern Brook & Water Bodies |   |

## FACILITIES AND MOVEMENT

5.14 Figure 9 illustrates the general distribution of existing local facilities and services located within a 2km (1.24 miles) direct line distance from the centre of the Site. The close proximity (approx. 4km) and ease of access to Aylesbury town also affords residents of Stoke Mandeville the opportunity to access a range of higher order shops and services, beyond the common reach of most villages.

5.15 Stoke Mandeville Hospital, is located within 2km of the Site and offers a wide range of specialist health service to the whole of Buckinghamshire.

5.16 Aylesbury Town Centre is located within 4km of the village, offering a wide range of retail, social, employment and leisure options. The village is extremely well-connected to the county town, with regular rail and bus connection.

5.17 Local facilities in the vicinity of the Site that are likely to be typically used on a day-to-day or weekly basis by future residents include a post office/convenience store, three public houses, a hair salon, community centre, playing fields, a pre-school and a first school. The majority of these facilities are within the 800m 'walkable neighbourhoods' guidance from 'Manual for Streets' (MfS), whilst all are within the National Travel Survey average walk trip distance and the 1.0/1.2km acceptable walking distance to schools and local facilities specified in Institution of Highways & Transportation (IHT) guidance.

5.18 In terms of education provision, Stoke Mandeville Combined School provides the closest access to primary education for the Site (located approx. 660m from the centre of Site). Other options for primary education are located within 2-3km distance from the Site boundary, such as primary schools located in South Aylesbury and Western Turville CoE School.

5.19 The Mandeville School provides the most accessible option for secondary education. Alternative secondary school provision is provided within Aylesbury, providing a greater range of secondary school options, all within 4km of the Site (under 10mins via car and approx. 15 - 20min via bus).

### SUSTAINABLE TRAVEL OPTIONS

5.20 Access to all local facilities is available via the existing footway network in the vicinity of the Site.

5.21 The Site is close to the southern end of the Aylesbury Jetway Cycle Route which connects Stoke Mandeville with Aylesbury Town Centre (and beyond). The Jetway cycle link provides a shared cycle route from Stoke Mandeville to Stoke Mandeville Hospital and subsequently provides both on-road and segregated cycle lanes from the hospital to Aylesbury town centre.

5.22 The Site benefits from convenient proximity to sustainable transport services, providing wider access to facilities and areas of employment. Stoke Mandeville Railway Station is located within 640m, or an eight-minute walk of the Site and provides regular services to Aylesbury, High Wycombe and London Marylebone; the station provides 120 sheltered cycle stands.

5.23 Existing bus stops are located on Risborough Road and Station Road, the closest being a 400 to 450m walk from the centre of the Site. Regular bus services 55, 300, 321, 647 and X30 serve these stops providing around 70 services per day between the Site, Chesham, Aylesbury and High Wycombe.



#### **Estimated Distance from Centre of the Site...**

- Post Office & Convenience Store - 350m*
- The Woolpack Pub & Restaurant - 355m*
- The Bull Public House - 470m*
- Stoke Mandeville Methodist Church - 500m*
- Hair Salon - 500m*
- Pollyanna Pre-school - 565m*
- Stoke Mandeville Combined School - 660m*
- Parish Council - 745m*
- Vehicle Repair Shop - 780m*
- The Bell Public House & Restaurant - 965m*



*Cycle journey to Aylesbury - approx. 15mins  
via Jetway Cycle Link*



*Aylesbury - Service approx. every 30mins /  
Journey time 2-10mins*

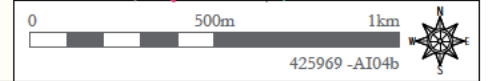
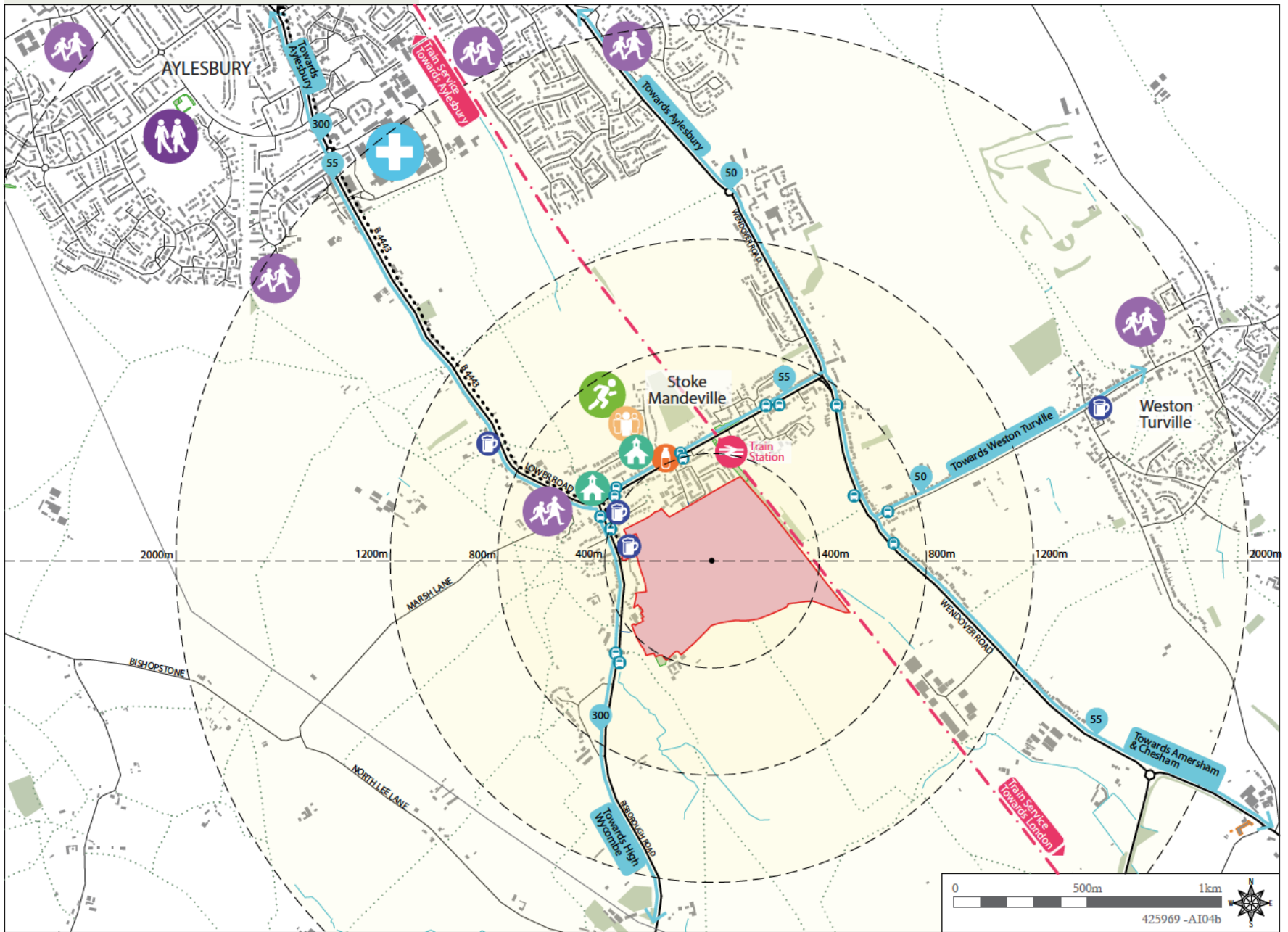
*London - Service approx. every 20-30mins /  
Journey time - 1hr*



*Bus Services to Aylesbury approx. every 20-  
35mins / Journey time - approx. 15 - 20mins.*



FIGURE 9: LOCAL FACILITIES AND SERVICES



- |                                |  |                          |                              |
|--------------------------------|--|--------------------------|------------------------------|
| Site Boundary                  | Existing Bus Route & Service               | Community Playing Fields | Pub / Restaurant             |
| Existing Road Network          | Existing Bus Stop (within 800m of Site)    | Place of Worship         | Direct Line Walking Distance |
| Existing Public Rights of Way  | Jetway Cycle Link to Aylesbury Town Centre | Community Centre         | Existing Buildings           |
| Existing Railway Line          | Secondary School                           | Local Convenience Store  | Existing Woodland            |
| Stoke Mandeville Train Station | Primary School                             | Hospital                 |                              |

# 6. SITE ASSESSMENT

*Desktop analysis and initial technical surveys have been instructed for the Site. The following section provides a summary of the technical findings at this stage, this section is concluded with a constraints and opportunities plan which underpins the design approach to the Site.*

## ACCESS & MOVEMENT

6.1 Vehicular access to the Site is proposed off Risborough Road to the west of the Site and Hampden Road to the north of the Site. The proposed access junctions take the form of priority T-junctions and appropriate visibility splays can be provided in line with Manual for Street (MfS) standards.

6.2 As part of the access strategy, improvements to existing pedestrian and cycling facilities could be provided, but will require more detailed discussions with the Local Highway Authority in order to agree the layout and route of such facilities.

6.3 Currently the structure of the village of Stoke Mandeville places a reliance on its primary road network for vehicle movement i.e. Risborough Road, Lower Road, Station Road and Wendover Road. The provision of two access points will help prevent an over reliance on any existing road or proposed junction, as the option will exist to connect both westwards onto Risborough Road or northwards towards Station Road. The new access onto Hampden Road will also provide convenient access to Stoke Mandeville Train Station via Station Road.

FIGURE 10: PROPOSED RISBOROUGH ROAD SITE ACCESS JUNCTION

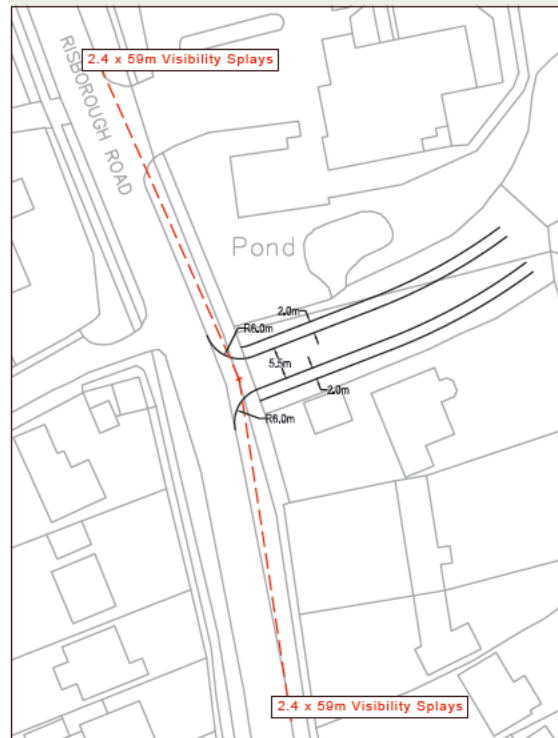
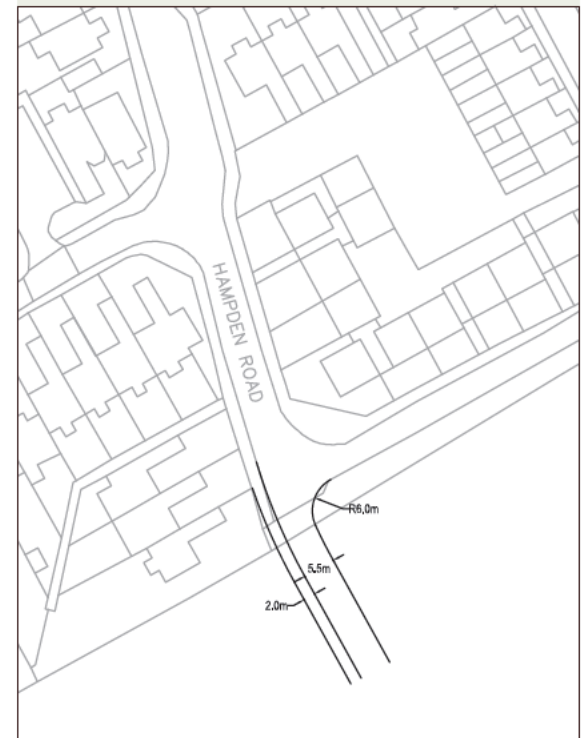


FIGURE 11: PROPOSED HAMPDEN ROAD SITE ACCESS JUNCTION



### LOCAL HIGHWAY NETWORK CAPACITY

6.4 Observations carried out across the local highway network have indicated that junctions and links in the vicinity of the Site are congested during both am and pm peak periods.

6.5 However, there are highway infrastructure schemes proposed by both HS2 and the LHA (Figure 12 & Figure 13) aimed at improving traffic conditions in the vicinity of the Site.

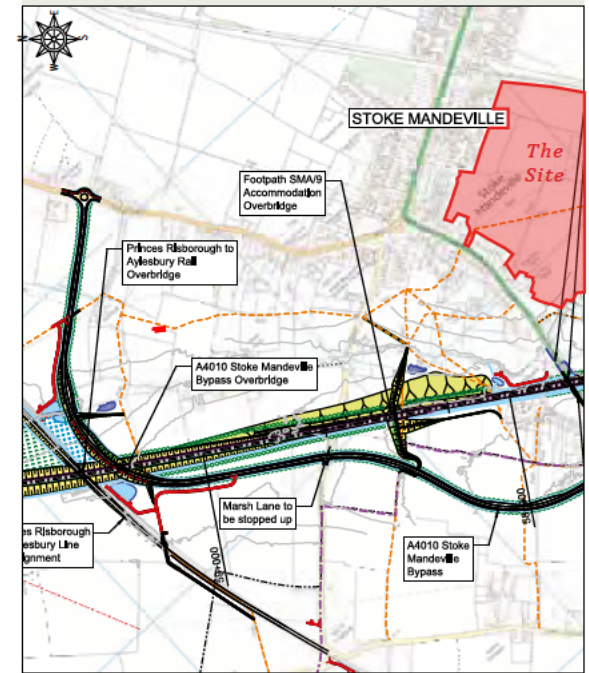
6.6 The proposed residential development would generate between three and five vehicles per minute during the peak periods and it is likely that mitigation schemes will need to be agreed with the LHA across the highway network, taking into account the significant planned infrastructure schemes.

6.7 At planning application stage, detailed capacity assessments will be carried out as part of the Transport Assessment at key junctions in the vicinity of the Site. A Travel Plan will also be undertaken which will seek to promote sustainable travel from the development.

FIGURE 12: PROPOSED LOCAL HIGHWAY AUTHORITY ROAD SCHEME



FIGURE 13: PROPOSED HS2 HIGHWAY INFRASTRUCTURE SCHEME





## ECOLOGY

6.8 Desktop research into designations and an extended Phase 1 Habitat Survey of the Site has been undertaken to assess the on-site habitats and their potential to support notable and protected species. The following provides a summary of the findings to inform development.

6.9 Arable and semi-improved grazed grassland habitats dominate the Site and are considered to be of generally low ecological value.

6.10 On-site ecological constraints are limited; there is a need to retain trees and hedgerows, protect/buffer the watercourse in the south of the Site and to complete further assessments for certain protected species.

6.11 Further survey work will be completed for a number of species including, bats, badgers, breeding birds and great crested newts as well as to inform development proposals and to ensure that any legal constraints are understood and appropriate mitigation developed. Opportunities exist to create new habitats and provide other ecological enhancements alongside development.

6.12 Given the location of the Site within the identified 'Zone of Influence' for Chiltern Beechwoods SAC, it will be necessary to consider any likely significant affects resulting from the development, notably from additional recreational pressure. Habitats Regulations Assessment will be required.

## CONCLUSION

6.13 There are no ecological constraints on the Site that would restrict delivery of development. Where ecology features are identified, mitigation and compensation strategies can be prepared, agreed and integrated with development proposals.

6.14 Sensitively-designed proposals that take account of the ecological opportunities and constraints that exist is capable of achieving betterment in terms of biodiversity within the Site.

PHOTOGRAPH DEMONSTRATING EXISTING SITE CONDITIONS





FIGURE 14: ECOLOGICAL FEATURES ANALYSIS



Site boundary	Boundary number	Scattered scrub	Watercourse and direction of flow	Public footpath
Arable	Woodland	Dense tall ruderal	Seasonally wet ditch	Fence
Improved grassland	Hedgerow	Scattered tall ruderal	Building	Gate
Poor semi-improved grassland	Indicative location of tree	Pond	Hardstanding	Target note: 1. Ancient wild pear tree <i>Pyrus pyrasler</i>
Field number	Dense scrub	Dry pond	Farm track	

## HERITAGE

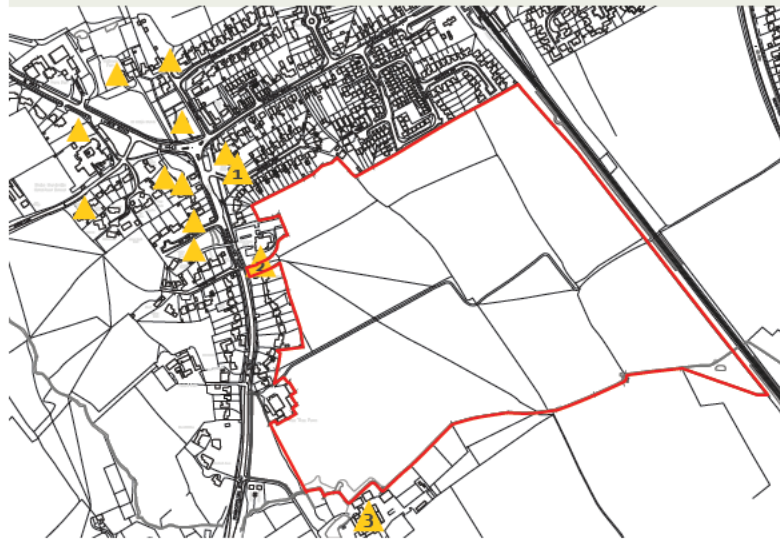
6.15 An initial assessment has been carried out to consider whether issues relating to heritage might constrain the residential development of the Site. There are no Scheduled Ancient Monuments, Conservation Areas or Historic Battlefields on or surrounding the Site. However, there are Listed buildings, as summarised below:

### LISTED BUILDINGS

6.16 A number of Listed buildings are located close to the Site along its Risborough Road Edge (Figure 15). Those labelled 1-3 are deemed to have potential to add constraint, or can be mitigated in relationship with future proposals coming forward. A brief description of each is provided below:

- 1 – Two Grade II Listed buildings to the north-west of the Site comprising 7, 9 and 11 Risborough Road and The Thatched Cottage. These are separated from the Site by modern housing and although they may have glimpses to the Site beyond, it is anticipated that the Site could be developed with no harm to their heritage significance.
- 2 – The Woolpack Inn and Spencer Cottage Grade II Listed buildings. These buildings front onto the road and are well-separated from the bulk of the Site historically. A proposed access road between the two buildings is not considered to be of detriment to their setting.
- 3 - Stoke House Grade II Listed building. The main façades face in a south-east, south-west and north-east direction. Historically, the building faced south-east, with the farmyard to the north. Community woodland and public open space is proposed to the north of the building and any harm to the heritage significance of this asset would be minimal.

FIGURE 15: LISTED BUILDING LOCATIONS PLAN



ST. MARY'S CHURCH, STOKE MANDEVILLE





THE WOOLPACK PUB - ADJACENT TO THE SITE



## UTILITIES

6.17 An initial assessment of the existing utility services in proximity to the Site has been carried out. A summary of asset maps and perceivable services considerations are outlined below:

### **Foul Drainage (Thames Water)**

6.18 Presence of a pressurised foul sewer and gravity foul sewer within the footway of Risborough Road.

6.19 Further foul water gravity sewers within the footways and carriageways of the streets surrounding the development to serve the nearby residential properties.

6.20 There is no foul or surface water apparatus within the Site boundary therefore diversions are not envisaged/necessary at this stage.

### **Clean Water**

6.21 A trunk main is present crossing the Site from south west to north east in direction.

6.22 This water main will require an easement protection strip of 6m, having no structures within the strip, centred on each water main (3m either side). If this easement cannot be maintained and accommodated into the proposed layout, the water main can be diverted along the newly proposed footways/carriageways.

6.23 Further distribution water mains are located within the footways and carriageways of the streets surrounding the development to serve the nearby residential properties.

### **Gas (SGN)**

6.24 A medium pressure gas main within the eastern footways of Risborough Road. Further low pressure mains within the footways and carriageways of the streets surrounding the development to serve the nearby residential properties.

6.25 Diversion/lowering of the medium pressure gas main in Risborough Road may be required to facilitate the proposed development access point. Further survey work to determine true locations and depths will be required.

### **Electricity (UK Power Networks)**

6.26 An overhead HV (11kV) line can be found crossing the southern parcel of the Site from west to east in direction. This overhead line terminates at a pole mounted transformer located close to the southern boundary of the Site.

6.27 This overhead line will require an easement of 6m either side of the line before any development can take place. If this easement cannot be delivered it will require diversion. There is a potential opportunity to divert the overhead line and install as an underground cable along the proposed main streets and utilised to serve the proposed development.

### **Telecommunications**

6.28 Overhead BT line encroaching within the southern boundary of the Site to serve Pippin's Equestrian Livery Yard to the south of the development.

6.29 Virgin Media confirm none of their assets are within close vicinity of the development.

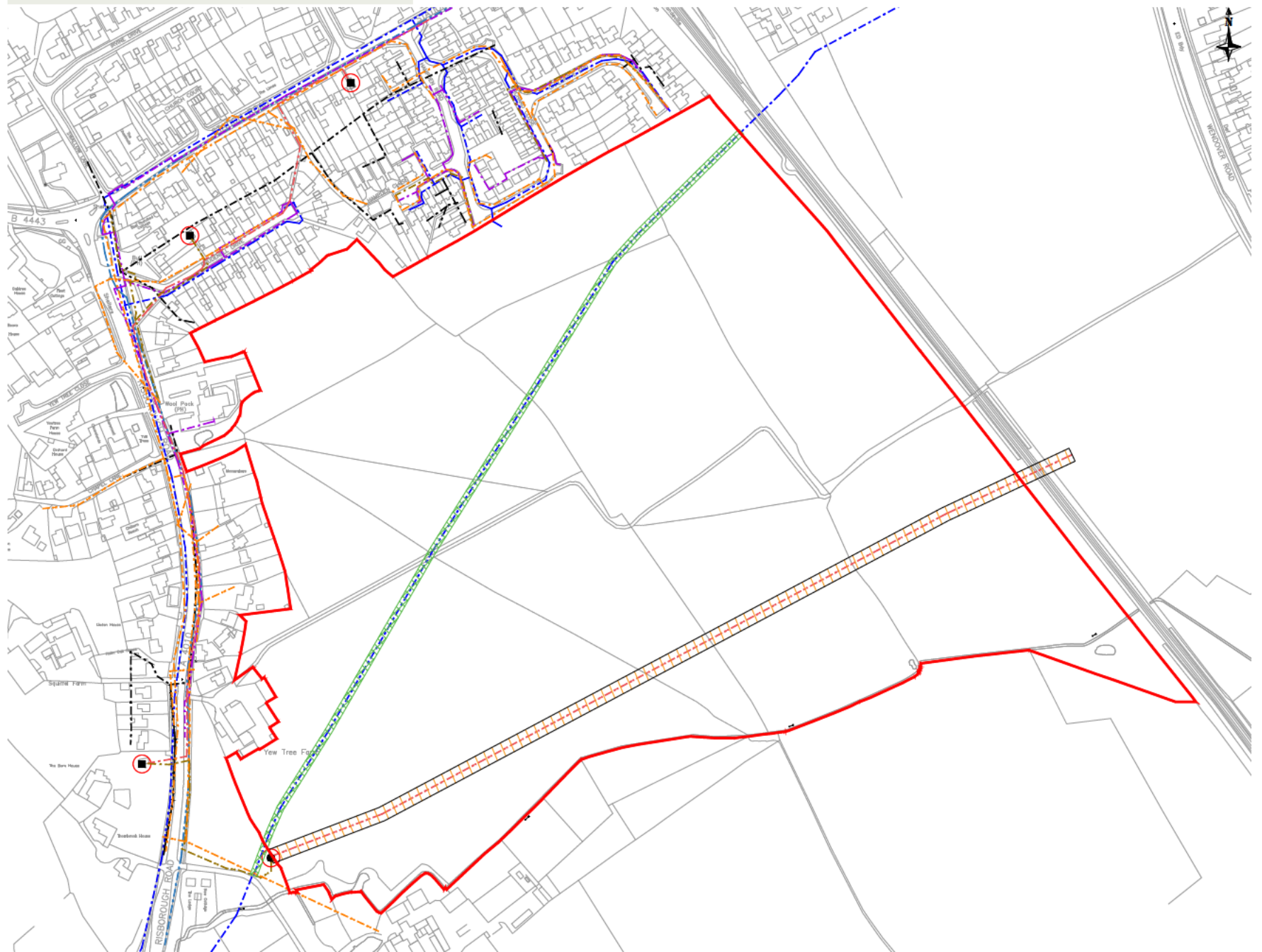
6.30 Diversions are not envisaged/necessary at this stage.

## CONCLUSION

6.31 There are no utilities features that would restrict development of the Site, and those that are present can be appropriately mitigated or integrated in the next stages of design.



FIGURE 16: UTILITIES PLAN



- KEY:**
- SITE BOUNDARY
- SERVICES KEY:**
- |   |                              |   |                           |  |  |  |                             |
|---|------------------------------|---|---------------------------|--|--|--|-----------------------------|
| <span style="color: blue;">—</span>     | CLEAN WATER MAIN             | <span style="color: green;">—</span>      | UNDERGROUND LV CABLE      |  | 3m WATER MAIN EASEMENT (6m TOTAL)          |  | POLE MOUNTED TRANSFORMER    |
| <span style="color: blue;">- - -</span> | FOUL WATER SEWER             | <span style="color: green;">- - -</span>  | OVERHEAD LV CABLE         |  | 6m 11kV OVERHEAD LINE EASEMENT (12m TOTAL) |  | ELECTRIC SUBSTATION 5m x 5m |
| <span style="color: black;">—</span>    | FOUL WATER PRESSURIZED SEWER | <span style="color: red;">—</span>        | UNDERGROUND HV CABLE 11kV |  |  |  |                             |
| <span style="color: purple;">—</span>   | LOW PRESSURE GAS MAIN        | <span style="color: red;">- - -</span>    | OVERHEAD HV CABLE 11kV    |  |  |  |                             |
| <span style="color: blue;">—</span>     | MEDIUM PRESSURE GAS MAIN     | <span style="color: orange;">—</span>     | UNDERGROUND BT CABLE      |  |  |  |                             |
|   |                              | <span style="color: orange;">- - -</span> | OVERHEAD BT CABLE         |  |  |  |                             |



## DRAINAGE

6.32 An initial assessment has been carried out to consider the appropriate approach to accommodating the surface water drainage of the Site.

6.33 Environment Agency (EA) Flood Map for Planning confirms that the Site is located entirely within Flood Zone 1 (Low Probability), which is land defined as having less than a 1 in 1000 annual probability of river or sea flooding. The nearest EA Main River is the Stoke Brook, which is located at the south west corner of the Site at Stoke House. There is an unnamed ordinary watercourse on the south boundary of the Site.

6.34 The existing Site is entirely greenfield in nature with no apparent positive drainage points. The topography of the Site falls to the south, and there are no significant surface water flow routes within the Site or on the access roads which could be restricted by development. The Site is also considered to be at low risk from sewer, canal, reservoir or groundwater flooding, subject to appropriate mitigation measures where necessary.

6.35 An appropriate surface water management strategy which complies with the latest local and national advice will be implemented on the Site to attenuate the increase in surface water runoff caused by development. As a first option, infiltration should be considered for the disposal of surface water. If infiltration is not viable, the rate at which the runoff is discharged into the wider network will be restricted to the equivalent greenfield runoff rate, preventing an increase in flows leaving the Site and thus ensuring the development does not have a detrimental impact upon flood risk elsewhere.

6.36 Through the application of Sustainable Drainage Systems (SuDS), the additional surface water will be stored within the Site and subjected to treatment to guarantee that the water quality in the wider drainage network is protected.

6.37 Wherever possible SuDS features will be above ground to enhance the aesthetic amenity of the development and provide valuable habitats for the local wildlife.

6.38 Any attenuation provided will be appropriately sized to include an allowance for climate change. Example SuDS features that will be incorporated into the development wherever possible include attenuation basins, permeable paving and swales.

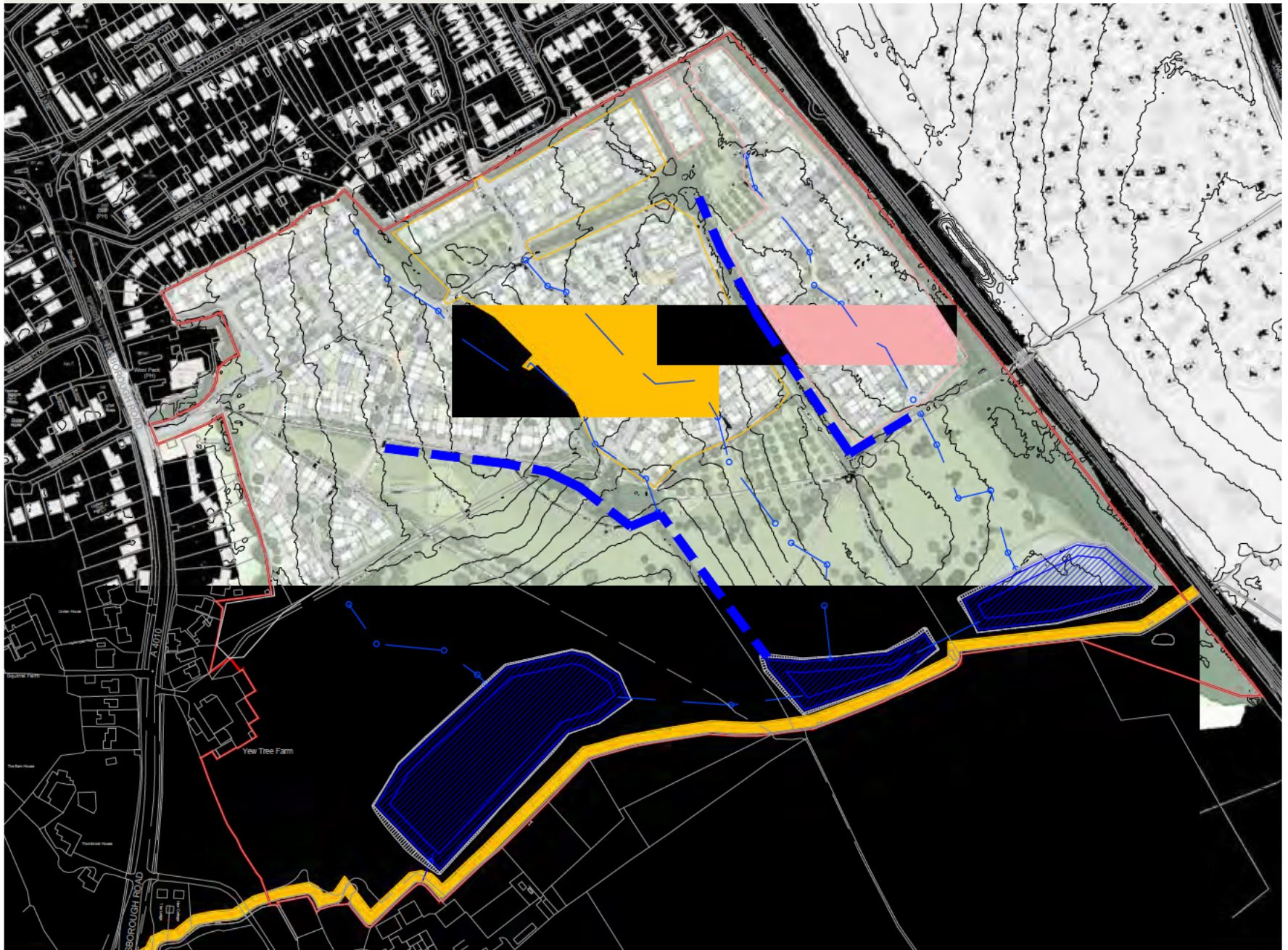
6.39 Figure 17 presents an indicative surface water drainage strategy which utilises the natural topography of the land to provide a controlled and attractive solution to on-site drainage.

TYPICAL EXAMPLE OF SUSTAINABLE DRAINAGE POND





FIGURE 17: INDICATIVE SURFACE WATER DRAINAGE STRATEGY



- |  |   |
|--|---|
| INDICATIVE SWALE<br>                      |  DRAINAGE CATCHMENT AREA 1 |
| INDICATIVE SURFACE WATER SEWER<br>        |  DRAINAGE CATCHMENT AREA 2 |
| INDICATIVE 8m EASEMENT TO WATERCOURSE<br> |  DRAINAGE CATCHMENT AREA 3 |

## LANDSCAPE ASSESSMENT

6.40 Following fieldwork undertaken in May and December 2018, a series of site-specific landscape observations are identified as follows:

- There is a subtle east-west ridge-line/discreet change in level that marks the logical limit to development. It provides an opportunity to locate a sensitive transition to the open countryside beyond, creating some linked areas of open space and characteristic tree planting to further soften the appearance of development over time.
- The retention of the existing hedgerows can form a connecting GI framework that would assist in breaking-up the mass of any development. It would also seem sensible to taper-off the development in the south-west corner, to maintain the views of the existing settlement edge on approach from the existing PRow. This would aid the visual merging of the proposed scheme with the existing dwellings on Risborough Road.
- Views from the highest point in the Chilterns (Coombe Hill) demonstrate that the proposed development would appear as a narrow band. The scheme will need to be sensitive to this landscape designation by considering building heights, density, scale and materials.

6.41 Further to those observations and based on the content of the Aylesbury Vale District Council and Buckinghamshire County Council Landscape Character Assessment and policy aspirations (including Policy NE4 – The Chilterns AONB & Setting of the Vale of Aylesbury Local Plan 2013-2033, Proposed Submission Version), a series of Green Infrastructure typologies have been recommended for the site. Each of those typologies also respond to the local context.

6.42 This demonstrates that a multi-functional and positive settlement edge can be created, particularly when considered in the context of the AONB.

6.43 The typologies are summarised below and represented spatially in Figure 18.

### Community Woodland

6.44 In response to character and policy objectives, an opportunity exists to create a broadleaved (predominantly Beech) woodland, functioning as a wildlife, recreational and education resource. It also assists in providing further visual enclosure and offering a buffer to Stoke House.

### Watercourse Buffer & SUDS Corridor

6.45 A linear corridor can be retained and enhanced for sustainable drainage and habitat connectivity.

### Open Common / Retained Views to the AONB

6.46 Open commons are another feature of this landscape. Extending the view-cone created by the existing PRow enables an open vista to be maintained towards the AONB and the wooded slopes of Wendover Woods. The common can be traversed by a network of informal paths and could be maintained through grazing.

### Nature Reserve

6.47 To assist with mitigation requirements and to offer enhancement, a Nature Reserve area could be created with a diverse range of habitats, including neutral grassland as targeted within the Council's LCA. There is potential to create new waterbodies and offer controlled access if preferable from an ecological perspective.

### Community Orchard

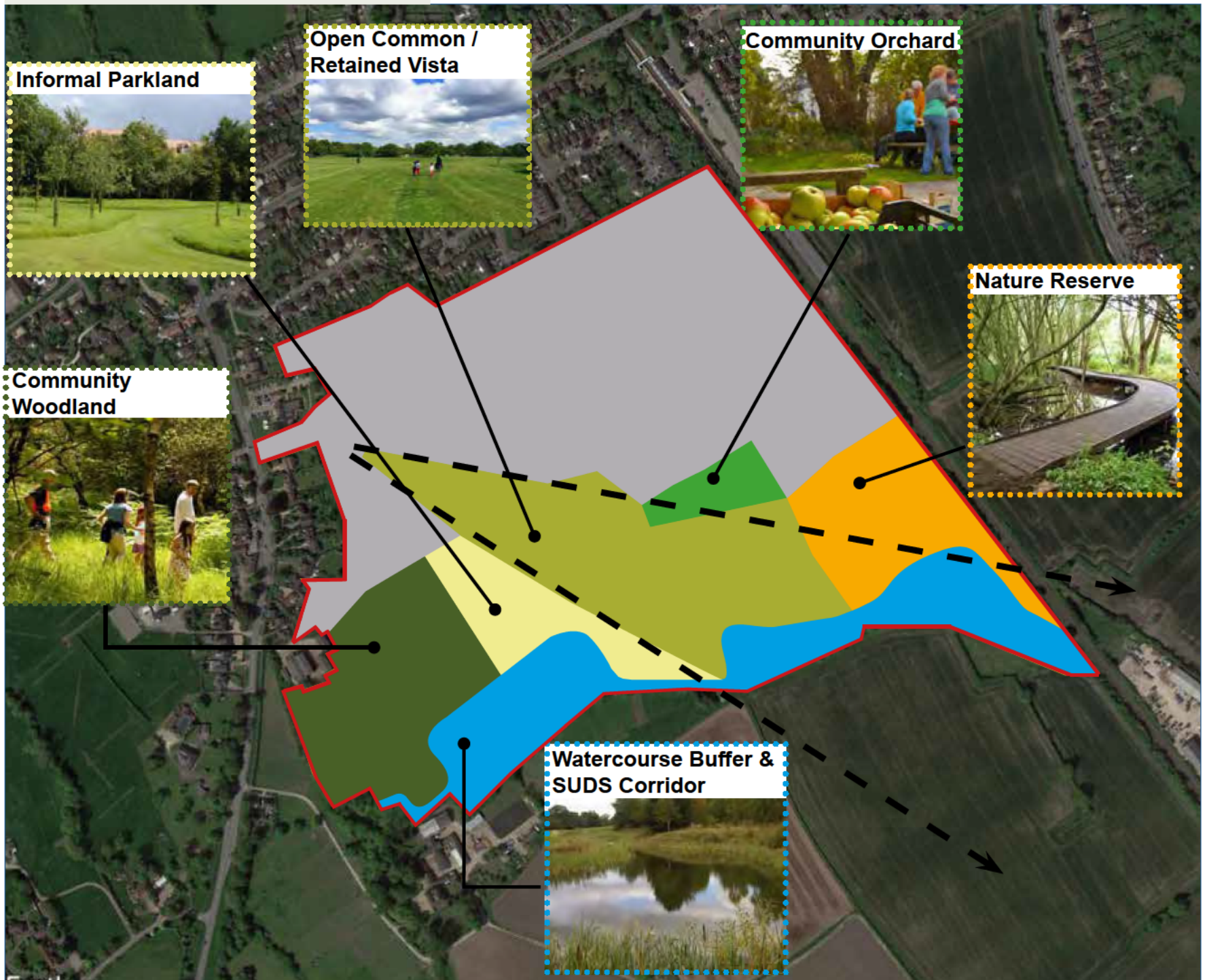
6.48 An orchard could be used as a focal space for offer community activities and offer the re-introduction to local Pear and Apple varieties that have declined.

### Informal Parkland


6.49 As a buffer to the community woodland, a parkland area could be created for more informal recreational activities. Scattered tree planting and managed grassland swards would offer an attractive and functional transition from development to open countryside.





FIGURE 18: LANDSCAPE RECOMMENDATION PLAN





 Site Boundary


 Open Common


 Community Woodland


 Watercourse Buffer and SuDS Corridor

 Informal Parkland

 Nature Reserve

 Community Orchard

 Development Area to include Green Infrastructure

 Views to AONB

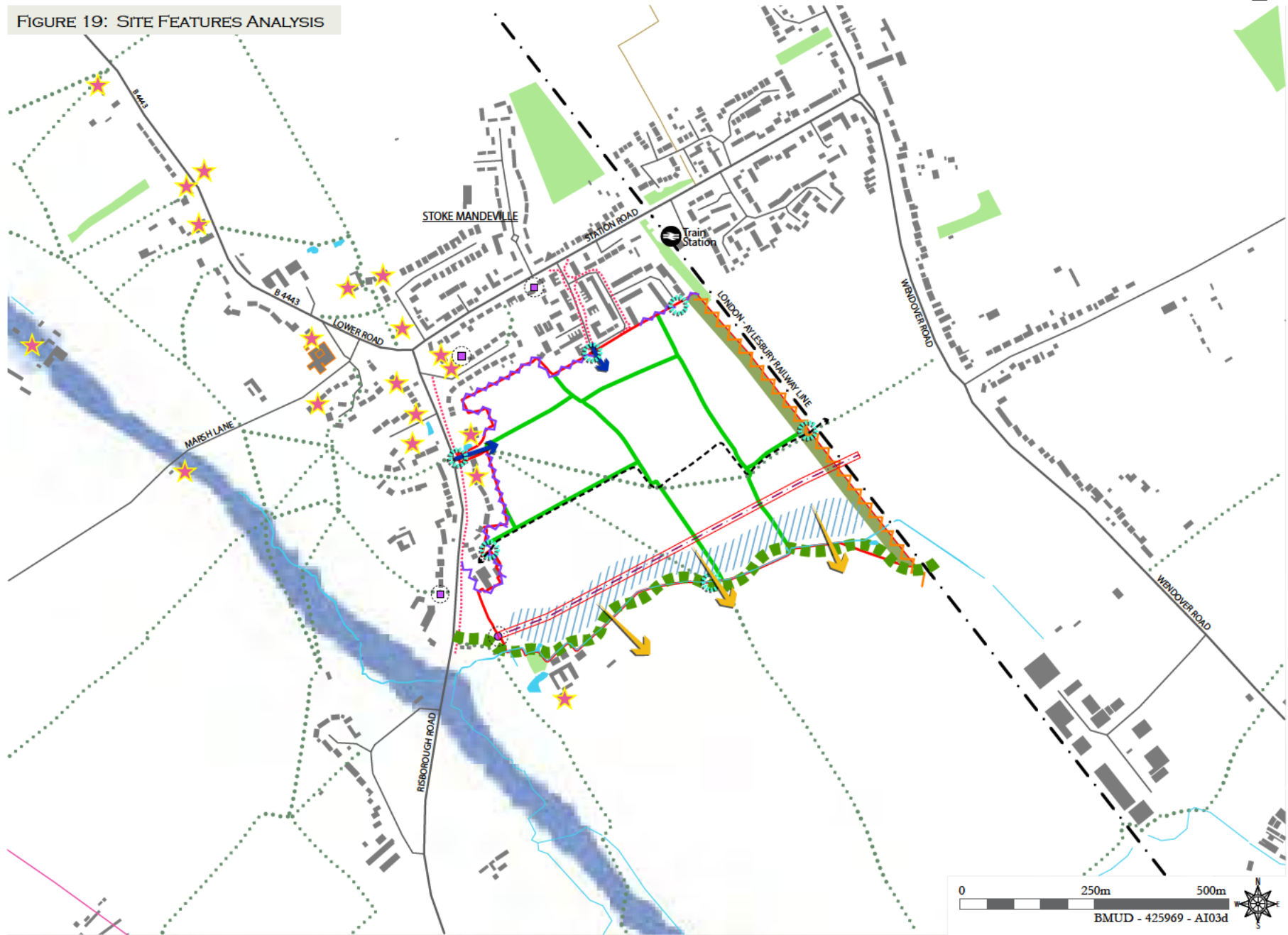
## SITE FEATURES ANALYSIS

6.50 Figure 19 identifies and summarises the principle considerations for development of the Site, which are as follows:

- Site topography is relatively flat. Developments should assume a gradual fall across the Site towards the southern boundary.
- The existing landscape comprises 7 parcels, each edged by hedgerows and trees. The southern and eastern edges are more densely planted. Proposals should aim to retain the level of ecological activity provided by the current network and consider areas of further enhancement, particularly along the southern and eastern edge.
- Gap views of the Site exist along Risborough Road, particularly further south where buildings become further apart. Proposals should consider development impact and the potential to enhance the identified views of value.
- Opportunity for primary site access exists off Risborough Road to the west of the Site and Hampden Road to the north of the Site.
- Potential noise impact of the existing railway line, resulting in the need to consider offset from the eastern boundary.
- Two public paths cross the Site from the access south of the Woolpack Pub towards the southern and eastern edge. The latter path crosses the railway line, offering the potential for a direct link to Stoke Mandeville Train Station. Development should consider the enhancement and improved sense of security along existing paths.
- Existing footpaths run along Risborough Road and Hampden Road, offering the potential to gain pedestrian access to the Site.
- The Site is located outside Flood Zones 2 & 3 and within Flood Zone 1. Land falls gently towards the small watercourse defining the southern boundary. Proposals should therefore consider the capture and retention of surface water runoff along the southern edges of the Site.
- The Site is not situated within or near a conservation area. The Woolpack Pub and Spencer Cottage (located adjacent to the western boundary) are both Grade II Listed buildings. Proposals therefore need to consider the setting of the Listed buildings. Other Listed buildings exist nearby however, views are likely to be screened by intervening buildings and landscape.
- Much of the eastern and southern boundary is defined by back gardens. Proposals should therefore consider the visual amenity and buffering to existing properties.
- Future proposals will provide a new settlement edge to Stoke Mandeville. Design proposals should therefore consider the transitional nature between the village and outlying countryside to the south.
- In order to encourage community/ social integration, proposals should offer variations of new shared green spaces for both existing and future residents to enjoy.



FIGURE 19: SITE FEATURES ANALYSIS



LEGEND

- |  |                                      |   |   |
|--|--------------------------------------|---|---|
| Site Boundary (approx. 30.04ha).             | Existing Buildings.                  | Listed Buildings.                           | Existing Properties Backing onto Site.  |
| Existing Road Network.                       | Existing Watercourses & Waterbodies. | Potential Primary Access Points.            | Visually Sensitive/Exposed Southern Edge.   |
| Existing Railway Line.                       | Flood Zone 2 & 3.                    | Potential Pedestrian / Cycle Access Points. | Potential Buffer Requirement to Railway Line (Assumed 20m).                       |
| Existing Public Rights of Way.               | Woodland.                            | Existing Footpath Network Adjoining Site.   | Lower Lying Land - Potential to Accommodate Sustainable Drainage Features (SuDS). |
| Existing Farmland Lane.                      | Existing Internal Hedgerows.         | Potential Noise Source from Railway Line.   | Potential Outward Views Towards Chiltern AONB.                                    |
| Clean Water Main with 3m Easement (6m Total) | Overhead HV Cable 11kV               | Pole Mounted Transformer                    | Electric Substation   |

# 7. DESIGN PRINCIPLES

7.1 The masterplan development has evolved through an iterative process in order to ensure a high quality design response.

7.2 The following design principles, and the illustrative masterplan, have been carefully informed by the highways, drainage, landscape and ecology advice provided.

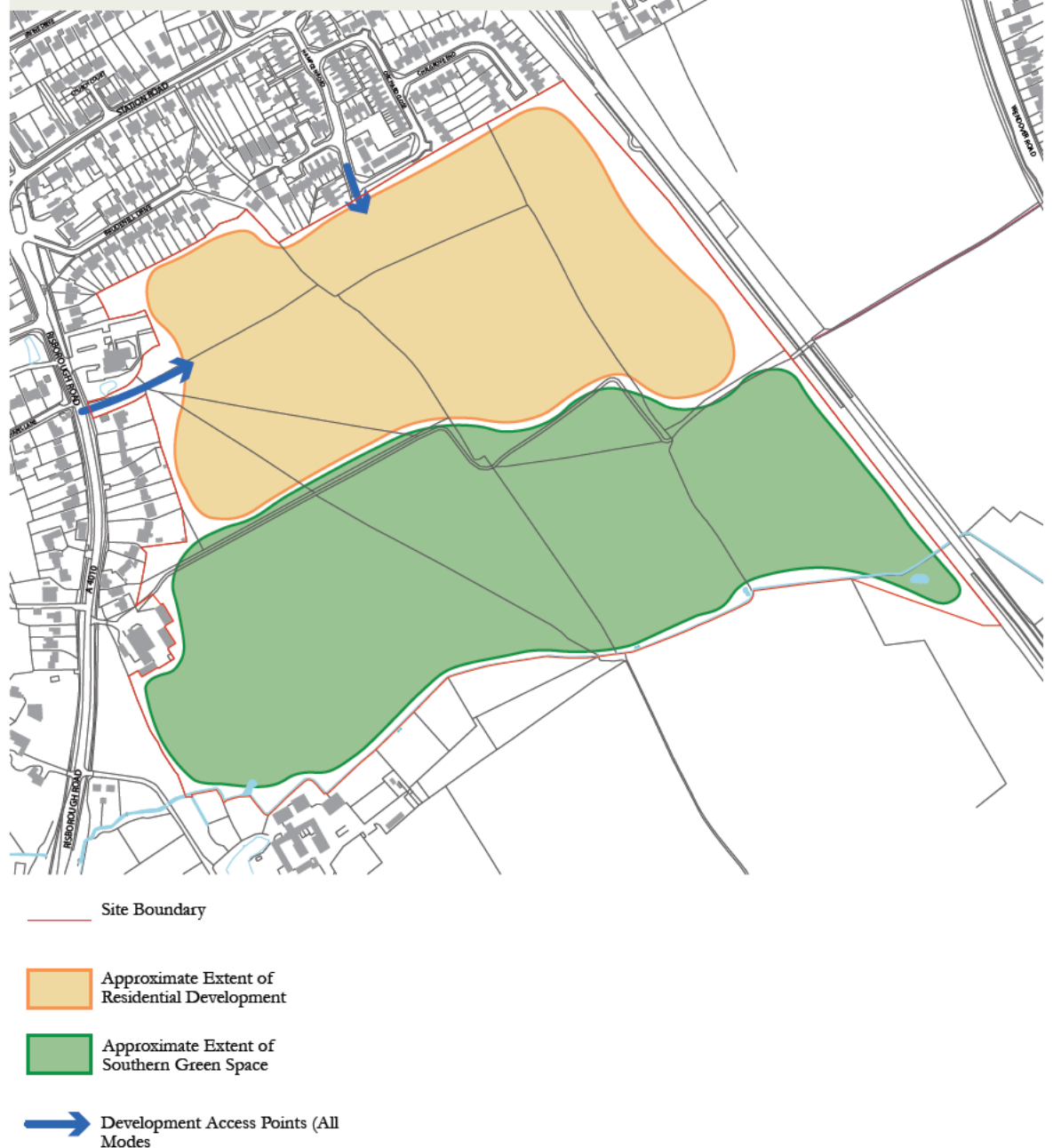
## LAND USE

7.3 Figure 20 demonstrates the principle of appropriate land use and development extent. The area north of the existing rural lane provides a logical edge to the extent of residential development. This will ensure that growth is retained within a sustainable location, close to nearby amenities such as community facilities, the local shop and Stoke Mandeville Train Station. The development extent also falls well-within the existing settlement limits of the village.

7.4 Two primary access points (vehicular, pedestrian & cycle) will be provided to ensure good permeability and assist with development delivery and phasing.

7.5 The principle of providing an extensive area of common green space south of the existing rural lane is also proposed. This is in response to the Site's context, as well as a desire to retain vistas towards the AONB and woodland slopes of Wendover Woods. It will also provide open space and landscape resources for the existing and new community.

FIGURE 20: LAND USE PRINCIPLES



## MOVEMENT

7.6 Figure 21 demonstrates the movement principles underpinning the proposals. Potential for Site access is provided from Risborough Road and Hampden Road.

7.7 It is proposed both access points will be provided to form a primary movement network to serve the Site. This will ensure a high level of permeability to the surrounding neighbourhood and road network. The primary circulation route will emphasise movement towards the west/north-west of the village (nearer the bulk of existing facilities) and northwards towards the train station, therefore minimising movement eastwards across the railway line.

7.8 The proposed secondary movement network will feed-off the primary circulation route, serving the majority of new streets within the development. Whilst encouraging a level of permeability, the proposed vehicular movement structure will aim to discourage drivers from 'rat running' between Risborough Road and Station Road.

7.9 The pedestrian and cycle access will be provided in conjunction with a primary movement network. Existing PRoW will be retained and incorporated into future layout designs.

FIGURE 21: MOVEMENT PRINCIPLES



- Site Boundary
- Approximate Extent of Residential Development (Including Open Space)
- Approximate Extent of Southern Green Space
- Existing Public Rights of Way to be Retained
- ➔ Primary Circulation Route between Risborough Road and Hampton / Station Road
- - ➔ Secondary Movement to Serve Remaining Parts of Site.
- 1 Proposed Development Phase Access



## GREEN INFRASTRUCTURE

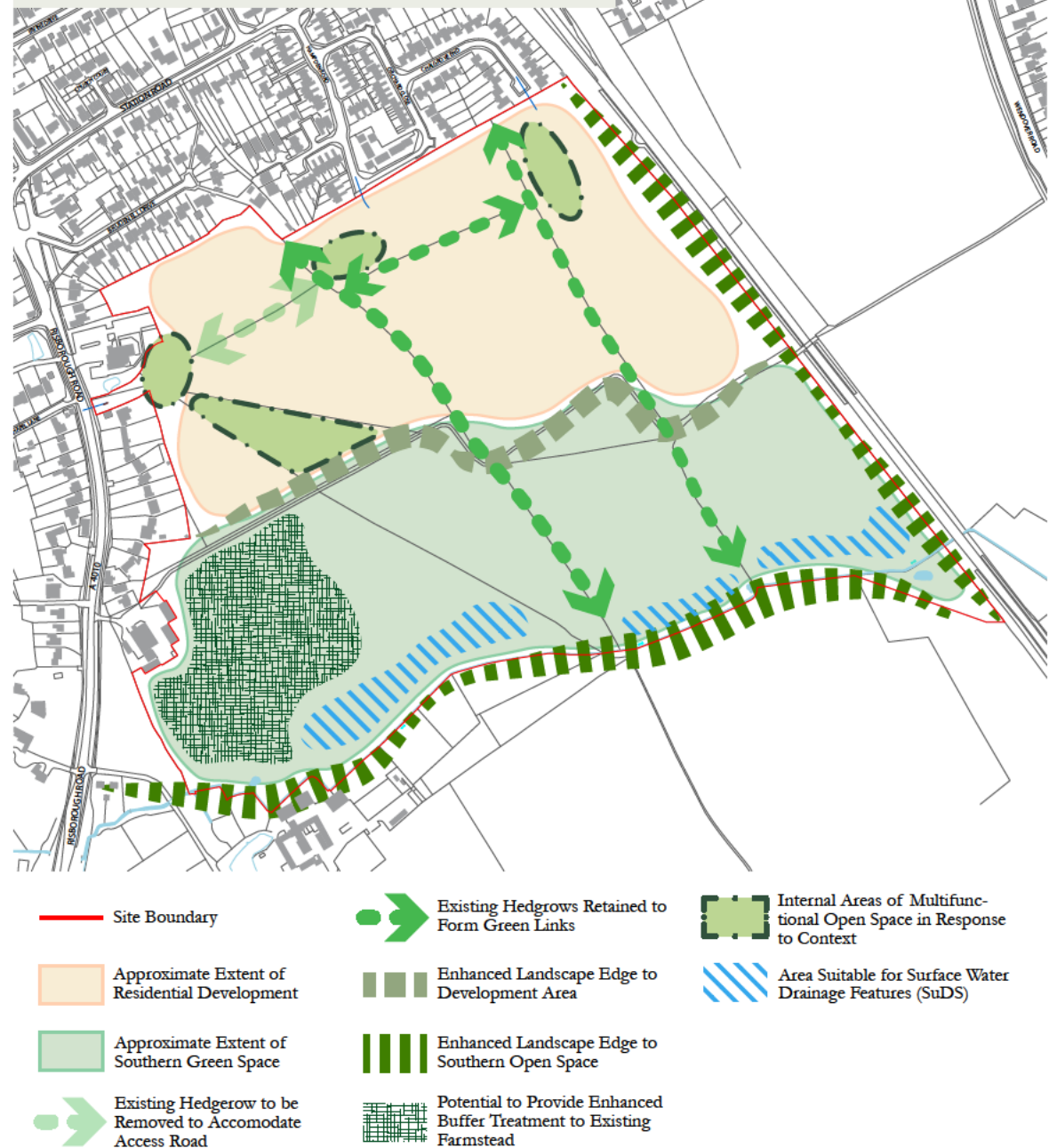
7.10 Figure 22 demonstrates the green infrastructure principles underpinning the proposals. The requirement to gain appropriate site access compromises the retention of the east-west hedgerow located near the north western corner of the Site. However, all other existing hedgerows will be retained to provide an ecologically rich network of green infrastructure corridors through the Site.

7.11 Enhanced landscape is also proposed along the existing rural lane running east to west within the centre of the Site. This edge will be designed to provide a positive natural interface between the development area and areas of common open space to the south. Similarly, retention of the existing hedgerows, along with landscape enhancements, is proposed along the southern and eastern edges.

7.12 Within the development area, a series of shared open spaces are proposed in response to the development context, including:

- Green offset areas in respect to Listed building setting;
- Response to PRoW network and key vistas;
- Provision of pocket green space close to primary access routes, in response to local character.
- Other green infrastructure principles include the need to consider buffer planting in relation to the setting of the existing farmstead (Yew Tree Farm).

FIGURE 22: GREEN INFRASTRUCTURE



INTERNAL SITE VIEW ALONG EXISTING PUBLIC RIGHT OF WAY





## 8. THE EMERGING PROPOSALS

*Based on the analysis undertaken for the Site, the emerging masterplan has been constructed to demonstrate a responsive design approach to the Site.*

8.1 Figure 23 presents an illustrative masterplan which demonstrates a well-considered development approach to the Site and surrounding context. The illustrative plan is informed through the technical assessments undertaken and carries through the design principles established in section “7. Design Principles”.

8.2 The adjacent caption provides a brief summary of the main features.







### KEY DESIGN PRINCIPLES

- ① *Principal vehicular and pedestrian access proposed via Risborough Road;*
- ② *Proposed vehicular and pedestrian access via Hampden Road;*
- ③ *Landscaped edge with recreational routes;*
- ④ *Existing public footpath incorporated into public open space and green corridors;*
- ⑤ *New woodland planting;*
- ⑥ *Indicative area reserved for potential new pedestrian footbridge;*
- ⑦ *Principle residential streets;*
- ⑧ *Potential emergency access connection limiting number of units served by each vehicular access;*
- ⑨ *Continuation of existing residential building line and streetscape;*
- ⑩ *Continuation of existing urban edge;*
- ⑪ *Community woodland;*
- ⑫ *Open common retaining vista towards the AONB and wooded slopes of Wendover Woods. Also serves as a landscape buffer to adjacent listed buildings;*
- ⑬ *Planted buffer to existing farm;*
- ⑭ *Focal space and marker buildings;*
- ⑮ *Green corridors and pedestrian links to public open space;*
- ⑯ *Indicative buffer to adjacent railway line;*
- ⑰ *Outline residential proposal (200 dwellings) currently awaiting determination;*
- ⑱ *Higher density housing;*
- ⑲ *Lower density residential edges;*
- ⑳ *Proposed nature reserve;*
- ㉑ *Existing field margins and development offset to address potential ecology;*
- ㉒ *Existing hedgerow to be removed/translocated to create new access and focal green; and*
- ㉓ *New parkland.*

FIGURE 23: INDICATIVE ILLUSTRATIVE LAYOUT PLAN



KEY

	Overall site location 75.75 Acres/ 30.66 Hectares		Existing trees and hedgerow		Children's play spaces		Key pedestrian/cycle routes		Listed buildings
	Proposed residential development. Circa 350no. dwellings @ average 34 dph		Proposed landscape		Watercourse buffer and suds corridor		Existing public footpaths		Existing bus stops
	Landscaped public open space 48.32 Acres 19.56 Hectares		Community orchards						



# 9. COMMUNITY BENEFITS

*The NPPF identifies social attributes as a key measure of Sustainable development. It is therefore important to consider opportunities to facilitate and enhance community togetherness and interaction between existing and future residents.*

9.1 The scheme presented has been developed to benefit community growth and social cohesion. Figure 24 presents those masterplan elements that have been introduced to providing a community benefit, as well as other functions.

## 1 COMMUNITY ORCHARD

A series of community orchards are proposed to facilitate: community cohesion; exploration; and self management of shared landscape assets.

## 2 CONNECTING PEDESTRIAN AND CYCLE ROUTES

The proposed pedestrian and cycle paths aim to provide residents with a variety of routes across the development and to areas of public open space. By adjoining with existing PRoW, residents are connected to the surrounding area.

## 3 COMMUNITY WOODLAND

A community woodland functions as a wildlife, recreational and educational resource. A benefit for the immediate local residents and the adjacent community, as well as wider green infrastructure objectives.

## 4 WATERCOURSE BUFFER AND SUDS CORRIDOR

The watercourse buffer and SuDS corridor not only serve as an environment for water retention, but one of exploration for the local community.

## 5 OPEN LANDSCAPE COMMON

A new common area provides a central feature within the new neighbourhood. The variety of green infrastructure creates a space of interest, recreation and informality. The central location of the common, and its connection with the public footpaths, encourages accessibility for all residents.

## 6 PROPOSED NATURE RESERVE

The proposed nature reserves offers a diverse range of habitats within the local community. This not only improves the overall environmental well being of the Site but, serves as an educational resource and a place for learning and leisure.

## 7 A CONNECTED AND LEGIBLE ROUTE

Proposed access routes connect the development to the surrounding neighbourhood and existing road network. A primary internal circulation route feeds the majority of the development and adjoins the existing PRoW and footpaths.

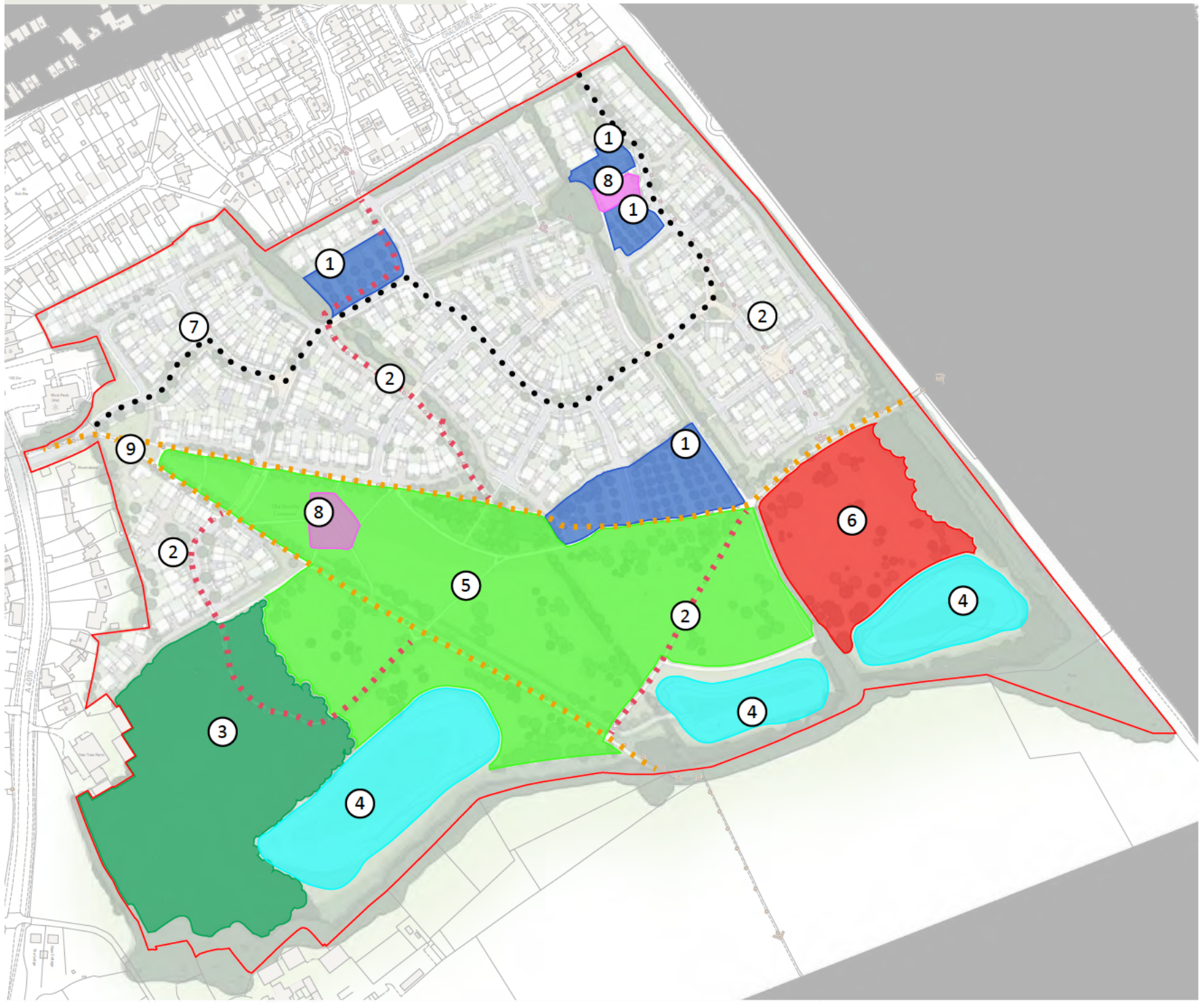
## 8 CHILDREN'S PLAY SPACE

Both a Local Equipped Area for Play (LEAP) and a Neighbourhood Equipped Area for Play (NEAP) can be provided for children living with the neighbourhood and local area. Their connection to the landscaped spaces offers a variety of natural play.

## 9 ENHANCED EXISTING PUBLIC FOOTPATHS

Enhancing the existing PRoW encourages pedestrian flow across the Site, creating connections between the landscaped and development areas.

FIGURE 24: COMMUNITY BENEFITS PLAN



# 10. SUSTAINABILITY OBJECTIVES & CONCLUSION

SUSTAINABILITY OBJECTIVES	LAND EAST OF RISBOROUGH ROAD ATTRIBUTES
VISION	<p>The vision for the Site is to build upon the sustainability attributes of Stoke Mandeville, in order to provide a new high standard living environment that responds to local context and reinforces the sense of village community.</p>
CULTURAL HERITAGE	<p>The Site is located close to a number of existing Listed buildings situated along Risborough Road. Proposals put forward will therefore be required to reduce any potential impact on the setting of Listed buildings resulting from future proposals.</p> <p>There are no Scheduled Ancient Monuments, Conservation Areas or Historic Battlefields within the Site nor its surroundings that would be negatively impacted upon by future development of the Site.</p>
LANDSCAPE	<p>Within the Site, the existing field boundaries and existing hedgerows will be largely retained and utilised to structure future development and phasing. This will form part of an overall strategy to deliver a connected network of Green Infrastructure. Other landscape improvements will include the inclusion of native vegetation, maintenance and improved connectivity between areas of neutral grassland.</p> <p>The gentle ridgeline, flowing centrally east to west, will mark a logical development limit. This will provide an opportunity to form a sensitive transition to the open countryside.</p> <p>The scheme will integrate with the existing landscape, with the aim to minimise any visual impact both from short and long-range views. Factors such as building heights, density, scale and materials will therefore require particular consideration.</p> <p>Significant landscape assets are also proposed such as a community woodland, SuDS corridor, pocket green spaces, open common, nature reserve and community orchard.</p>
BIODIVERSITY	<p>Biodiversity gains will be provided through the retention of existing Green Infrastructure, as well as new planting to link up existing habitats. The creation of new woodland, grassland, scrub, tree planting, and wetland, particularly within the southern part of the Site, will offer further benefit to flora and fauna.</p>
CLIMATE CHANGE MITIGATION	<p>The development of the Site offers opportunities to encourage walking, cycling and access to local public transport facilities. Bus and rail services exist within acceptable walking distances from the Site, offering convenient access to Aylesbury regional towns / villages. Stoke Mandeville train station also offers commutable access to London, offering a convenient alternative to car travel.</p> <p>Existing PRoW will be incorporated into the scheme design and utilised to establish a new network of pedestrian footpaths, cycling routes and open spaces. Such provision will appeal to both existing and future residents by offering alternative options for leisure, amenity and recreation.</p> <p>Development would provide the opportunity to meet current standards of sustainable construction and levels of energy efficiency.</p>



CLIMATE CHANGE ADAPTATION	<p>The southern open space will provide ample space within the Site to provide sustainable attenuation features for surface water as part of a sustainable drainage system. Attenuation features will be incorporated above ground to enhance the appearance of green space and provide ecologically rich habitats for local wildlife. The attenuation provided will be appropriately sized to include an allowance for climate change.</p> <p>New dwellings will be designed and built to achieve sustainability and energy efficiency standards in line with Building Regulations.</p>
WASTE	<p>The opportunity is available to include measures, both during the construction and operational phases, to minimise and recycle all types of waste.</p>
DELIVERY	<p>Richborough Estates' procurement method of appointing development partners will facilitate the quick delivery of the development, using proven methods . The Site affords the opportunity to provide multiple sales outlets which will further facilitate housing delivery.</p>
EDUCATION	<p>The Site is located close to the existing Stoke Mandeville Combined School, which will provide convenient primary education provision. Other options for primary education are located within 2-3km of the Site. The Mandeville School provides the nearest secondary school provision, located approximately 2-2.5km from the Site. The village's strong links to Aylesbury enhances the Site's accessibility to educational services.</p>
TRANSPORT	<p>The Site benefits from two potential vehicular access points, each of which provides easy access onto the surrounding primary movement network. This provision of alternative access points will help relieve pressure on the existing network and provide residents with greater route options.</p> <p>Potential for further benefits to the network have been noted, such as junction upgrades. Further dialogue with the Local Authority is required however to determine the level of improvement required. By maintaining and integrating a pedestrian/cycle movement network, residents will be encouraged to utilise the convenient access to bus and rail travel.</p> <p>Proposals will also aim to incorporate electric charging points to serve future electric vehicles.</p>
HOUSING	<p>Residential development will provide approximately 350 new family homes. The indicative proposals put forward demonstrate a sensitive design approach, resulting in a substantial over-provision of green space. Therefore, the potential remains for future development in this area, subject to future landscape assessments, impact on AONB and housing needs at the time.</p> <p>Locally inspired development character areas with localised variation in density (15-40 dwellings per net hectare at an average of 35) and a complementary hierarchy of street types;</p> <p>A mix of housing types and sizes to increase housing choice. A number of serviced plots (amount to be agreed in negotiation with local authority) will also be provided to accommodate any need for self/custom build homes.</p> <p>Affordable Housing at a proportion of 25% of the total, equating to a total of 87 affordable dwellings as groups of 1, 2, 3 and 4 bedroom tenure blind dwellings, pepper potted across the development.</p>
HEALTH	<p>The pedestrian/cycle network provided, alongside active elements of open space, will promote leisure and activity amongst future and existing residents.</p>
COMMUNITY	<p>Landscape assets, such as the community orchards, play facilities, common open space and the walking/cycle network will provide the opportunity for social interaction and help instil a sense of community, ownership and pride.</p>
ECONOMY	<p>The provision of new homes to accommodate new residents will help support local services and businesses.</p>



Richborough  
Estates

## Appendix 2 - Correspondence with Parish Council

**From:** [James Dunn](mailto:James.Dunn@rpsgroup.com)  
**To:** [chairman@smnp.org.uk](mailto:chairman@smnp.org.uk)  
**Cc:** [Paul Hill](mailto:Paul.Hill@rpsgroup.com); [vicechairman@smnp.org.uk](mailto:vicechairman@smnp.org.uk)  
**Subject:** RE: Stoke Mandeville Neighbourhood Plan  
**Date:** 17 December 2019 09:44:57  
**Attachments:** [image005.png](#)

---

Hi Laurence,

We are acting for Richborough Estates.

Kind regards,

**James Dunn**

Graduate Planner  
RPS | Consulting UK & Ireland  
T +44 121 622 8520  
E [james.dunn@rpsgroup.com](mailto:james.dunn@rpsgroup.com)

---

**From:** Laurence Prestage <[chairman@smnp.org.uk](mailto:chairman@smnp.org.uk)>  
**Sent:** 12 December 2019 09:36  
**To:** James Dunn <[James.Dunn@rpsgroup.com](mailto:James.Dunn@rpsgroup.com)>  
**Cc:** Paul Hill <[paul.hill@rpsgroup.com](mailto:paul.hill@rpsgroup.com)>; [vicechairman@smnp.org.uk](mailto:vicechairman@smnp.org.uk)  
**Subject:** RE: Stoke Mandeville Neighbourhood Plan

**CAUTION:** This email originated from outside of RPS.

OK James, thank you.

I need to know who you represent please.

Regards  
Laurence Prestage  
Chairman  
Stoke Mandeville Neighbourhood Plan Steering Group  
Tel : 07946 025456  
Email : [chairman@smnp.org.uk](mailto:chairman@smnp.org.uk)  
Web : [www.smnp.org.uk](http://www.smnp.org.uk)

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**From:** James Dunn <[James.Dunn@rpsgroup.com](mailto:James.Dunn@rpsgroup.com)>  
**Sent:** 11 December 2019 15:34  
**To:** [chairman@smnp.org.uk](mailto:chairman@smnp.org.uk)  
**Cc:** Paul Hill <[paul.hill@rpsgroup.com](mailto:paul.hill@rpsgroup.com)>  
**Subject:** RE: Stoke Mandeville Neighbourhood Plan

Hi Laurence,

Thanks for your email.

We represent clients with land interests in the area.

Kind regards,

**James Dunn**

Graduate Planner  
RPS | Consulting UK & Ireland  
T +44 121 622 8520  
E [james.dunn@rpsgroup.com](mailto:james.dunn@rpsgroup.com)

---

**From:** Laurence Prestage <[chairman@smnp.org.uk](mailto:chairman@smnp.org.uk)>

**Sent:** 11 December 2019 12:34

**To:** James Dunn <[James.Dunn@rpsgroup.com](mailto:James.Dunn@rpsgroup.com)>

**Cc:** Paul Hill <[paul.hill@rpsgroup.com](mailto:paul.hill@rpsgroup.com)>

**Subject:** RE: Stoke Mandeville Neighbourhood Plan

**CAUTION:** This email originated from outside of RPS.

Can you let me know please what your interest is in the Stoke Mandeville Neighbourhood Plan?

Regards  
Laurence Prestage  
Chairman  
Stoke Mandeville Neighbourhood Plan Steering Group  
Tel : 07946 025456  
Email : [chairman@smnp.org.uk](mailto:chairman@smnp.org.uk)  
Web : [www.smnp.org.uk](http://www.smnp.org.uk)

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**From:** James Dunn <[James.Dunn@rpsgroup.com](mailto:James.Dunn@rpsgroup.com)>

**Sent:** 11 December 2019 11:34

**To:** [chairman@smnp.org.uk](mailto:chairman@smnp.org.uk)

**Cc:** Paul Hill <[paul.hill@rpsgroup.com](mailto:paul.hill@rpsgroup.com)>

**Subject:** Stoke Mandeville Neighbourhood Plan

Hi Laurence,

I'd be grateful if you would add me and my colleague, Paul Hill (copied in), to the consultation list for the neighbourhood plan.

[James.dunn@rpsgroup.com](mailto:James.dunn@rpsgroup.com)

[paul.hill@rpsgroup.com](mailto:paul.hill@rpsgroup.com)

Kind regards,

**James Dunn**

Graduate Planner  
RPS | Consulting UK & Ireland  
321 Bradford Street  
Birmingham, West Midlands B5 6ET, United Kingdom  
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**From:** [Andrew Clark](#)  
**To:** [James Bradshaw](#)  
**Cc:** [Paul Hill](#)  
**Subject:** Resignation  
**Date:** 01 September 2022 12:52:38

---

**CAUTION:** This email originated from outside of RPS.

Dear James

I just wanted to let you know that I have resigned as a Stoke Mandeville Parish Councillor and Chair of the neighbourhood plan steering group with immediate effect.

As you may know, I have been recently subject to a barrage of highly personal abuse and malicious allegations from members of a residents' campaign to 'Save the Bucks Sports & Social Club' (BSSC). Both Graham Stewart, former Chairman of the PC, and David Starr, the technical editor of the neighbourhood plan, have recently resigned after receiving the same treatment. Having been away over the bank holiday, I find on my return that this group is still making the same nasty remarks within its own ranks, and preparing for a further barrage of abuse in September. This deliberate targeting of me as an individual, even abusing me as a disabled person, has destroyed my enthusiasm to serve the people of Stoke Mandeville and is why I am resigning.

Some of the BSSC group have joined the parish council as co-opted members and by September that faction will hold a majority on the Council. Their views on the nature, shape and progress of the Neighbourhood Plan are very different to the present Steering Group, and much of the skills and credibility of the present steering group have been lost. In my view, the likelihood of bringing any of the Neighbourhood Plan big ideas to a point of proven deliverability, and of drafting a legally sound Reg 16 document, is now remote. My final advice to the Parish Council, sadly, therefore has been to pause the Neighbourhood Plan until early 2023 for a fresh public consultation and the drafting of a new Plan by a new steering group. It will be for the new parish council in September to make a decision on that.

It has been a pleasure to work with you and your team and I have much appreciated your skill and professionalism. I wish you well for the future.

Best wishes

Andrew



17 April 2024



Stoke Mandeville Parish Council.  
The Community Centre,  
Eskdale Road,  
Stoke Mandeville,  
Aylesbury,  
Buckinghamshire, HP22 5UJ.

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Dear Sir or Madam,

**Stoke Mandeville Neighbourhood Plan  
Objection to Policy GI1  
Local Green Space Designation at the Former Buckinghamshire County Council Sports and Social Club**

We write on behalf of our client, Buckinghamshire Council Investment and Development Team (hereinafter referred to as Buckinghamshire Council). Buckinghamshire Council is the owner of the land comprising the former Buckinghamshire County Council Sports and Social Club (BCC S&S Club).

In summary, Buckinghamshire Council requests that Site 5: BCC S&S Club Playing Fields is removed from the list of Designated Local Green Spaces in Policy GI1. The proposed policy does not meet condition (a) of the 'basic conditions' (paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990) because the proposed Local Green Space Designation at the Former Buckinghamshire County Council Sports and Social Club site does not comply with guidance set out in the NPPF.

This letter follows a similar letter written to Stoke Mandeville Neighbourhood Plan Steering Group in December 2019, and written representations to yourselves in August 2021.

These representations specifically relate to the updated emerging Stoke Mandeville Neighbourhood Plan, dated 20<sup>th</sup> February 2024, published by Buckinghamshire Council.

**Summary**

In summary:

- The site initially constituted a private sports ground, originally for Buckinghamshire County Council staff. The facility fell into decline and has been closed since the end of the 2017/ 2018 football season.
- The [then] County Council made significant attempts to keep the site open:
  - In 2016/17 the Council spent £54,000 in supporting the Bucks Sports and Social Club. In 2017 the club and buildings were in poor condition and were recorded as "no longer fit for purpose and, in some cases, are unsafe."
  - Between August 2016 and July 2017 a transitional group (made up of County Councillors and club members) was formed to find a way forward for the club but no legal entity or appropriate body was formed to which the Council could legally or responsibly hand over management of the club and site.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East..

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- Following a September 2017 'call in', a further period was allowed for organisations to come forward to run the club. Two proposals were received but neither was considered to be acceptable.
- The most appropriate way to bring forward public and recreational use of the site is for new sports facilities to be brought forward in conjunction with residential development. This has been proposed in a recent planning application. There is no other proposition at the current time.
- The site has been closed to the public since May 2018. There is no public access. The site has no local significance because of its beauty, historic significance, recreational value, tranquillity or richness of its wildlife.
- The former clubhouse may once have served the local community to an extent but Local Green Space Designation is not appropriate to this building. It is already protected as an Asset of Community Value.
- There is no suggestion in the Stoke Mandeville Neighbourhood Plan Consultation Statement 2024 of significant or widespread support for the designation of the site as a Local Green Space.

Therefore proposed policy GI1 does not meet condition (a) of the 'basic conditions' (paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990) because the proposed Local Green Space Designation at the Former Buckinghamshire County Council Sports and Social Club site does not comply with guidance set out in the NPPF.

It is clear that much Buckinghamshire County Council officer and Member time was afforded towards retaining the sports and social club in 2016/2017. Organisations were given a clear time frame (August 2016-April 2017, extended until July 2017) to put forward proposals to run the club. A further period was allowed between September-November 2017. Two bids were received but neither was considered acceptable. Considering all the above, and in particular given the lack of beauty, historic significance, recreational value tranquillity or richness of its wildlife, there is no justification for the designation of the site as a Local Green Space.

We would welcome a meeting with the Neighbourhood Planning Group to discuss these representations and to consider whether a collaborative way forward might be found.

## **Planning Policy Background**

The NPPF (2023) guidance on Local Green Space designations is as follows:

105. The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.

106. The Local Green Space designation should only be used where the green space is: a) in reasonably close proximity to the community it serves; b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and c) local in character and is not an extensive tract of land.

107. Policies for managing development within a Local Green Space should be consistent with those for Green Belts.

National Planning Practice Guidance set out guidance on Local Green Space designation here: <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local->

[green-space](#) (it is too lengthy to reproduce in full in this letter). However, paragraph Paragraph 017 Reference ID: 37-017-20140306 in particular states:

*Some areas that may be considered for designation as Local Green Space may already have largely unrestricted public access, though even in places like parks there may be some restrictions. However, other land could be considered for designation even if there is no public access (eg green areas which are valued because of their wildlife, historic significance and/or beauty).*

## **Background**

BCC S&S Club is located off Lower Road in Stoke Mandeville. It is approximately 3.7 hectares in size. The site currently comprises a closed clubhouse and the site of a now demolished pavilion surrounded by a mixture of hard surfaced and open grass land which was formerly used as sports pitches and tennis courts.

The area is surrounded by the back garden fences of residential properties and a school. The area is suburban residential in character. The sports facilities are unused and derelict. The site is temporarily used as a private car park. The site is not located within a conservation area, nor does it contain any local or statutory listed heritage assets.

The site is not a public park or public recreation ground and there are no public rights of access or rights of way.

When first in use, BCC S&S Club was a private sports ground that originally provided a recreational facility for Buckinghamshire County Council staff. Many large organisations enjoyed such facilities historically. Generally, across the UK, staff sports clubs were a large and important facility through the 1970s and 1980s but tended to close from the 1990s onwards due to the combination of business austerity measures and the reduction in household spending in pubs and clubs.

Throughout the 1970s and 1980s BCC employees were automatically members of the club. This became optional in the 1990s. By the time of closure, the club had 56 members from a Council workforce of 3,000 (13,000 including schools).

The last recorded use of the football pitches was in the 2017/2018 season for Buckinghamshire County Council football club. Since then the sports facilities have been unused.

The clubhouse was used as a members-only bar and function room but closed in January 2018. The Council has been unable to invest in the maintenance of the site facilities, which were not used for the provision of any core Council service. The buildings on the site have been deemed unsafe for use. The general hardstanding and other infrastructure including former sports pitches and tennis courts would require significant investment.

Buckinghamshire County Council investigated (in summer 2016) the possibility of transferring management of the club to an 'alternative delivery vehicle' (likely to be a community group set up for the purpose of running the club). However, despite many efforts (including numerous meetings and extensions of time) no appropriate body to which the Council could hand over management of the site was formed.

Attached to this letter as Appendix 1 is a Planning Note on the closure of the former BCC S&S Club. This should be read in conjunction with these representations. The Note considers the process and consideration that Buckinghamshire County Council undertook when the decision to close the former Sports and Social Club was taken in 2017.



## Criteria for Identifying Local Green Space

The key tests are set out in NPPF paragraph 106. The Local Green Space designation should only be used where the green space is: a) in reasonably close proximity to the community it serves; b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and c) local in character and is not an extensive tract of land.

The former BCC S&S Club site is assessed against these criteria below.

### ***a) in reasonably close proximity to the community it serves;***

The BCC S&S Club is private land and the club has been closed since 2018. It does not, therefore, serve any community. It is noted that the examiner of the Buckingham Neighbourhood Plan deleted the proposed Ford Meadows Local Green Space Designation on the basis that it was a private sports ground.

When the BCC S&S Club was open, its original purpose was to serve BCC staff. Those staff would have predominately worked at Council buildings in Aylesbury and would live across the County and beyond. The Council's sports club could have been based anywhere in the County, but just happened to be in Stoke Mandeville. This does not convey any special rights upon people in close proximity to the land to use it as public playing field.

It is important to distinguish between the sports facilities and the clubhouse bar and function room. The latter is a building that attracted some use from local people. However, the presence of a clubhouse bar and function room is not consistent with a Local Green Space designation. It is noted that the facility has been listed as an Asset of Community Value.

In summary the site has no public access and does not serve a local community.

There are many alternative public sports facilities (or private sports facilities available for public hire) in close proximity to the site. These are shown on a plan attached as Appendix 2.

### ***b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife;***

The site:

- is not 'beautiful' (it is a partly derelict suburban residential area);
- has no historic significance (there are no historic buildings);
- has no 'tranquillity' as it is temporarily used for car parking and built form borders the entire site, including a school and a busy road (Lower Road);
- has no recreational value (it has been closed to the public since Spring 2018); and
- has no evidence of richness of wildlife (as evidenced by ecology reports supporting the recent planning application for residential development).

The site would have had some recreational value when it was operating as a private sports club over six years ago. However, it was provided for the use of Buckinghamshire County Council staff, which is not the 'local' Stoke Mandeville community. The Evidence Base (see below) does not identify specific local support for the protection of the BCC S&S Club.



The site was also offered to local community groups between August 2016 and July 2017 (a time period seemingly extended until July 2017). A further period was allowed between September to November 2017. Buckinghamshire County Council clearly went to significant lengths to solicit a community use for the club and this is set out as a matter of public record in the various meeting reports and minutes. Only two bids were received but neither were considered acceptable.

***c) local in character and is not an extensive tract of land.***

The site is local in character and not an extensive tract of land. However, it is not permissibly publicly accessible and has not been used as recreational space since 2018.

### **Ownership**

NPPG Paragraph: 019 Reference ID: 37-019-20140306A states the qualifying body (in the case of neighbourhood plan making) should contact landowners at an early stage about proposals to designate any part of their land as Local Green Space. Indeed, Buckinghamshire Council wrote to the Neighbourhood Plan Steering Group in December 2019 (via Carter Jonas) and again in 2021 (via Savills) setting out its concerns about the potential designation.

The NPPG states that *“some areas that may be considered for designation as Local Green Space may already have largely unrestricted public access, though even in places like parks there may be some restrictions. However, other land could be considered for designation even if there is no public access (eg green areas which are valued because of their wildlife, historic significance and/or beauty).”*

The site has no public access but, as set out above, also has no value due to wildlife, historic significance and/or beauty. Therefore there is no case for the site to be designated as a Local Green Space.

Stoke Mandeville Parish Council has recently made a financial offer for the site, which is currently under consideration by Buckinghamshire Council. However, this is not considered to have any bearing on whether the site meets the relevant criteria for designation as Local Green Space.

### **Evidence Base**

We have reviewed the Stoke Mandeville Neighbourhood Plan Consultation Statement 2024. There is no indication of the site being special to the local community. The Sports and Social Club is barely mentioned specifically in the Consultation Statement (other than meetings involving the landowner).

There is a generic question in the 2021 Questionnaire about the protection of green spaces but it is hardly surprising that local residents supported this in principle. The principle of protection of the specific former S&S club site as a Local Green Space is not mentioned in the Key Issues (Section 7).

It is noted that the Neighbourhood Plan proposes up to 15 Local Green Spaces with a total area of nearly 22 ha. The evidence provided is very generic and there is no detailed evidence to support the identification of any particular site or area of land. The ‘evidence’ in the Neighbourhood Plan simply restates the guidance in the NPPF and applies it to each site without any consideration or explanation of why the sites meet the criteria. It does not constitute ‘evidence’ to simply say that a site is ‘special’. The Neighbourhood Plan needs to properly explain why each site meets the required criteria and entirely fails to do so.

Therefore nothing in the evidence base explains why that the former BCC S&S club “is demonstrably special to the local community and holds a particular local significance.” If the site did meet that criteria then that local interest would be expected to be fully evidenced in the evidence base, rather than reference to a generic question that generally supports the protection of on of 15 identified green spaces.

### **Other Protection**

Part of the site is listed as an Asset of Community Value. This legislation would secure community use should an appropriate proposal come forward. We consider that no further protection needs to be applied.

### **The Way Forward**

The site is considered suitable for housing development (HEELAA site SMD011). A planning application for residential development has been submitted and is under consideration by Council planning officers. This proposal provides a clear mechanism for retaining sporting use within the site by delivering a sports pitch to the south of the site that will be managed in association with the adjacent Booker Park school. The development will also provide a financial contribution to enable the re-use of mothballed sporting facilities at nearby Walton Court.

The site has been closed to the public since Spring 2018. The former sporting facilities are closed and cannot be used.

Local Green Space Designation would therefore prevent the only viable redevelopment proposal by installing a very high level of planning protection that could prevent the development that would cross subsidise the reprovision of sporting facilities. Accordingly, the Neighbourhood Plan as drafted would in fact have the effect of stymying the most likely route to providing public recreational use of the site.

### **Conclusion**

For the avoidance of doubt Buckinghamshire Council currently considers that the Neighbourhood Plan does not currently meet the condition (a) of the 'basic conditions' (paragraph 8(2)) of Schedule 4B to the Town and Country Planning Act 1990. The proposed Local Green Space Designation at the Former Buckinghamshire County Council Sports and Social Club site does not comply with guidance set out in the NPPF.

We therefore ask that the site is removed from the proposed list of Local Green Spaces in Policy G11.

Yours faithfully,



**Neil Rowley**  
Director

# Buckinghamshire Sports and Social Club

## **Planning Note – Closure of former BCC Sports and Social Club.**

This note considers the process and consideration that Buckinghamshire County Council undertook when the decision to close the former Sports and Social Club was taken in 2017. It then considers that process against VALP policy requirements for proposals involving the redevelopment sports and infrastructure buildings.

### **A. DESCRIPTION OF CLUB**

The former Sports and Social club comprised:

- A northern field for various uses including football and cricket
- A southern field for various uses including as a football pitch
- A pavilion (now demolished) that contained changing rooms, toilets and a small cricket club room. The pavilion was closed in 2014 (see below) so from that date on there were no changing facilities.
- A clubhouse containing the bar, function room and committee room.
- Tennis courts
- Car park

### **B. ORIGINAL CABINET DECISION**

The decision to close the club was taken by the Cabinet Member for Resources on 28 Jul 2017 (reference R04.17). This is recorded in the 'Cabinet Member Decisions' section of the Buckinghamshire County Council Cabinet meeting on 25th September 2017. The report records that *"The Cabinet Member: AGREED Option 2 – Close the whole Bucks Sports and Social Club building and external facilities with effect from 31 October 2017. Existing bookings up until 31 October 2017 will be honoured. The Cabinet Member took into account the representations that had been received."*

### **C. FIRST CALL IN (12<sup>th</sup> SEPTEMBER 2017)**

A call-in request was subsequently submitted and considered at a meeting of the Finance, Performance and Resources Select Committee 12th September 2017.

The report to that Select Committee sets out the reasoning behind the decision to close the club and the considerations made by officers and Members. It is clear from the report that the decision was not taken lightly and the former County Council made significant efforts to keep the club open. The report in full is attached as Appendix A but in summary:

1. The Council had been unable to invest in the maintenance of the site facilities (which were not used for the provision of any core Council service). In August 2014, the Pavilion building which housed changing room and toilet facilities was closed due to identified health and safety risks including:
  - Asbestos in the roof
  - The roof being in poor and unsafe condition
  - A requirement for electrical re-wiring
  - Non-compliance with current standards for the prevention of legionella,
  - Degradation of the shower and toilet facilities
2. In 2016/17, the Council spent £54,000 in supporting the Bucks Sports and Social Club (net of the income raised). Based on current income and costs, this was projected at £65,500 for 2017/18. This level of subsidy was considered unsustainable in the then financial climate. Given

the very low usage by BCC staff and lack of use of the site for any required public service, the expenditure was not considered represent value for money.

3. In September 2017, many of the facilities at the club were recorded as “no longer fit for purpose and, in some cases, are unsafe.” The Pavilion building, which housed changing facilities and toilets, has already been closed due to health and safety risks and its generally unacceptable state of disrepair. This closure removed the provision of changing facilities for the football team, one of the main groups using the site. The tennis courts had (in September 2017) “not been used for several years and are not considered fit for purpose.” The car park required a barrier to prevent fly tipping and unauthorised use of the site. In addition to the health and safety risks posed by the condition of the site, the lack of available investment for modernisation meant that the prospect of making the club commercially viable through additional private functions and increased bar usage was not realistic.
4. Until 2014, the club had been managed by an independent committee. An audit investigation showed irregularities in the club accounts and its financial processes, including cash handling and book keeping.
5. Following meetings in August 2016 with County Councillors, some club members and representatives from the football group, an agreement was reached that:
  - The Council would cease all financial subsidy of the club from April 2017
  - The Council would lease the club and site to a new legal entity to be in place from April 2017, governed by a clearly incorporated committee with a key role for County Councillors in its formation and operation
  - The lease would be FRI (Fully Repairing and Insuring)
  - Under the leadership of the new committee, the club would seek external funding for developing the changing facilities

The transitional group made up of County Councillors and club members did not reach agreement on the future governance structure of the club; no legal entity or appropriate body was formed to which the Council can legally or responsibly hand over management of the club and site.

The Council has held numerous meetings and invested a significant amount of time in supporting this process, which extended beyond the original transition date of April 2017.

6. The Council considered (in 2017) that there were suitable alternative sports facilities in close proximity to the site. The report records that *“while it is understandable that members of the club (and the Council) will regret its closure, the fact that there are suitable alternative facilities in the vicinity should mitigate the impact on the local community. Indeed, these facilities are more modern, more fit for purpose and better placed to meet the needs of the various sports groups that currently use the Sports and Social Club.”*
7. The report records that *“It has not been an easy decision to close the Sports and Social Club but a significant amount of time has been spent by officers and Members in exploring all possible options. It is only after carefully evaluating these options and exhausting the credible alternatives that officers met with the Cabinet Member for Finance and Resources and local Members to discuss the recommendation to close the club. This meeting took place on 17th July 2017.”*

The Finance, Performance and Resources Select Committee unanimously agreed that the decision should be referred back to the Cabinet Member for reconsideration and advocated that Option 3 in the original report should be revisited, as there had been a lack of consultation with service users and local Members and the Club Committee had now organised itself more effectively and could be in a position to take over the management of the Club and make it profitable.

The Finance, Performance and Resources Select Committee proposed that the Cabinet Member should take a period of three months to have further discussions with local Members and the Club



Committee and then report back to the Select Committee on his decision. The Cabinet Member agreed to this proposal.

#### **D. FOLLOW UP CALL IN (19th December 2017)**

The report to the Finance, Performance and Resources Select Committee dated 19<sup>th</sup> December 2017 sets out the further work undertaken following the 12<sup>th</sup> September call in meeting. The report in full is attached as Appendix B but in summary:

Cllr Chilver responded to the Call In decision by writing a letter to all key stakeholders and interested parties. The letter stated *"I am consulting all interested parties and stakeholders with a view to understanding if there is any meaningful prospect of the club being able to sustain itself independently going forward. However, if there is no such plan then regrettably I will have to confirm my decision to close the club. I am available to discuss this matter with any individuals or groups who would find that helpful and officers will also be made available to ensure that there is full understanding of what is being consulted on and what the options are"*.

Over this period of time various meetings, telephone conversations and emails took place with the Cabinet Member for Resources. In the end, two organisations submitted proposals for the future of the club.

An independent evaluation panel consisting of Legal, Finance and Procurement professionals was established. The panel reviewed the two proposals. The advice of the independent panel of experts was that neither of the two plans put forward represented an acceptable level of risk to the County Council.

The minutes of the meeting (also attached at Appendix B) provide further detail on why the bids were properly considered by the Council but unfortunately not considered to be acceptable. In summary:

- The Interim Director of OD & HR explained that she had met with the Bucks Sports and Social Club Members group, along with the Cabinet Member and on one occasion with the Commercial Director, to explain the required format for their submission and to answer any questions. She and the Cabinet Member met with the group approximately six times.
- Both bids had areas where further information could have been helpful and one bid did not include Profit and Loss details.
- However the view of the evaluation panel was that the community bid was over-optimistic about potential income levels, whilst also being unrealistic about costs. The Profit and Loss projected a very slim profit margin for the Club which meant that it would be difficult to build up any reserves for the future.
- The Director of Finance and Assets confirmed that he agreed with the financial assessment of the submissions. Assumptions around income and membership levels were optimistic and although the submission outlined various grants and donations that the Club hoped to secure, there was little evidence to support this. A very small surplus was forecast for the first two years but with no reserves the sustainability of the club was questionable.
- A Member expressed concerns that the community bidders may not have received sufficient advice for preparing their bids and the evaluation panel had not been adequately briefed. The Director of OD and HR reiterated that one of the bids had been well-supported with a number of meetings with the Cabinet Member and officers. The Council had not been aware that a second bid was being prepared, but when that submission was received the deadline was extended to allow it to be reformatted to meet the requirements, but the bidder asked for the submission to be evaluated as it stood.

Stoke Mandeville Parish Council was also been contacted separately to ensure they had received the consultation letter and whether they required a specific meeting with the Cabinet Member for Resources to discuss their concerns however there was no request for further information.

The Cabinet Member advised that as the evaluation report concluded that both bids represented an unacceptably high risk to the Council, the original decision to close the Bucks Sports and Social Club would still stand.

## **E. SUMMARY OF KEY POINTS**

In summary:

- In 2017 the club and buildings were in poor condition and were recorded as “no longer fit for purpose and, in some cases, are unsafe.”
- In 2016/17 the Council spent £54,000 in supporting the Bucks Sports and Social Club.
- Between August 2016 and July 2017 a transitional group (made up of County Councillors and club members) was formed to find a way forward for the club but no legal entity or appropriate body was formed to which the Council could legally or responsibly hand over management of the club and site.
- Following the September 2017 call in, a further period was allowed for organisations to come forward to run the club. Two proposals were received but neither was considered to be acceptable.

It is clear that much Buckinghamshire County Council officer and Member time was afforded towards retaining the sports and social club in 2016/2017. Organisations were given a clear time frame (August 2016-April 2017, extended until July 2017) to put forward proposals to run the club. A further period was allowed between September-November 2017. Two bids were received but neither was considered acceptable.

## **F. ASSESSMENT AGAINST VALP POLICY**

### **POLICY I2 SPORT AND RECREATION**

This is set out in full in our Planning Statement. For the reasons set out above, the site cannot be considered an “existing sports and recreation facilities” (as it closed in 2018). Therefore Policy I2 does not apply. Nevertheless, we set out in our Planning Statement that:

(a) the southern field of the application site will be made available for informal sport and leisure use, potentially through a partnership with Booker Park School.

(b) Development in the northern field is centred around a large open space which will provide general amenity space and a children’s play area. This will link with the northeast and southwest corners of the site to provide a diagonal route through the site, which will significantly enhance the Open Space network as a whole and contribute to the Green Infrastructure Strategy.

(c) The development will make a contribution to the Council’s proposals to bring the (currently mothballed) Walton Court sports area back into use. This will ensure that a currently disused sports facility is once again available for sport and recreation.

Accordingly, it is considered that the planning application proposal would comply with parts G and H of VALP Policy I2.

POLICY I2 COMMUNITY FACILITIES, INFRASTRUCTURE AND ASSETS OF COMMUNITY VALUE

Policy I3 states that in considering applications for alternative development or uses, the council will consider the viability of the existing use, that the site/use has been marketed for a minimum period of 12 months at a price commensurate with its use together with proof there has been no viable interest, marketing of the building or facility at a price commensurate with its use, the presence of alternative local facilities and the community benefits of the proposed use.

Our assessment of these points is set out below, with reference to the above:

The viability of the existing use	The existing (2016) use was demonstrable unviable as set out above.
That the site/use has been marketed for a minimum period of 12 months at a price commensurate with its use together with proof there has been no viable interest	The proposal was offered to local community groups between August 2016-July 2017, seemingly extended until July 2017). A further period was allowed between September-November 2017. It is clear from the above that Buckinghamshire County Council went to significant lengths to solicit a community use for the club and this is set out as a matter of public record in the various meeting reports and minutes.
The presence of alternative local facilities	When the club was closed, the County Council recorded there were <i>“suitable alternative facilities in the vicinity should mitigate the impact on the local community. Indeed, these facilities are more modern, more fit for purpose and better placed to meet the needs of the various sports groups that currently use the Sports and Social Club.”</i>
The community benefits of the proposed use	The community benefits of the proposed use include: <ul style="list-style-type: none"> <li>- Use of the southern field for sports and leisure</li> <li>- A financial contribution towards sports facilities at Walton Court</li> <li>- The provision of affordable housing in excess of local plan requirements.</li> </ul>

Accordingly, it is considered that the proposal complies with Policy I3 of the VALP.

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**Appendix 1**  
**Response to the call in September 2017**

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**Buckinghamshire County Council**  
**Finance, Performance and Resources**  
**Select Committee**

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## Report

<b>Title:</b>	Bucks Sports and Social Club
<b>Committee date:</b>	12 <sup>th</sup> September 2017
<b>Author:</b>	Lloyd Jeffries – Director of Operations
<b>Contact officer:</b>	Gill Smith – Facilities Management Head of Service <a href="mailto:gismith@buckscc.gov.uk">gismith@buckscc.gov.uk</a>  01296 383931
<b>Cabinet Member sign-off:</b>	Cllr John Chilver

### Executive Summary

This paper provides context and rationale for the agreed closure of the Bucks Sports and Social Club. The current arrangements for the club are considered unsustainable for reasons of:

- Financial and commercial viability
- Condition and suitability of facilities
- Health and safety

After considering a range of options and investing significant time and effort in pursuing an alternative arrangement which would transfer management of the club and its facilities to a community organisation, the Council has taken the difficult decision to close the club and site from 31<sup>st</sup> October 2017.

This paper outlines the factors that have led to this decision, the alternatives considered and why they were ruled out, assesses the impact of the closure on the local community and proposes suitable alternative provision.





## **Background and Context**

### **Background to the Sports and Social Club**

Buckinghamshire County Council originally purchased part of the Sports and Social Club land in 1936, purely as a sports field, with a pavilion, for BCC staff. In 1974, the Council purchased an adjacent piece of land and in 1975 constructed the club building with lounge bar and sports hall. In 1985 the club building was extended to provide a games room. Throughout the 1970s and 1980s, BCC employees were automatically members of the club; this has now changed and BCC employees have the option to opt in to club membership, with their monthly fees deducted from payroll. The club currently has 56 members of a council workforce of 3,000 (13,000, including schools).

Over time the facilities have been increasingly used by local community groups, although this was not the original purpose of the site and there is no obligation to provide them. The usage of the site by these groups amounts to around 28.5 hours per week. Excluding private functions, this means that the club is unused 73% of its normal opening time.

The Council has been unable to invest in the maintenance of the site facilities, which are not used for the provision of any core Council service. In August 2014, the Pavilion building which housed changing room and toilet facilities was closed due to identified health and safety risks including:

- Asbestos in the roof
- The roof being in poor and unsafe condition
- A requirement for electrical re-wiring
- Non-compliance with current standards for the prevention of legionella,
- Degradation of the shower and toilet facilities

In 2016/17, the Council spent £54,000 in supporting the Bucks Sports and Social Club (net of the income raised). Based on current income and costs, this has been projected at £65,500 for 2017/18. This level of subsidy is unsustainable in the current financial climate and, given the very low usage by BCC staff and lack of use of the site for any required public service, does not represent value for money. In autumn 2016, the Council therefore communicated clearly to club users that it would cease to subsidise the club from April 2017.

### **The Council's Financial Position**

The Council has made in excess of £100m of savings over the last 7 years. Members and Chief Officers have had to take increasingly difficult decisions to meet this target and the Council must now focus on its core business if it is to meet its statutory obligations and the priorities of the Strategic Plan while operating within its significantly reduced budget.

## **Reasons for Change**

The current operating arrangements for the club are no longer considered viable for the following reasons:

1. **Financial sustainability** – the current business model for the club is financially unsustainable and it requires subsidy from the Council to maintain its basic operations. This subsidy was £54,000 in 2016/17 and is projected to be £65,500 in 2017/18. This position is after cutting costs and before making the investment needed to repair or replace the deteriorating facilities. The cost of this is estimated in the range of £109,000 to £170,000.
2. **Suitability of facilities** – many of the facilities at the club are no longer fit for purpose and, in some cases, are unsafe. The Pavilion building, which housed changing facilities and toilets, has already been closed due to health and safety risks and its generally unacceptable state of disrepair. This closure has removed the provision of changing facilities for the football team, one of the main groups using the site. The tennis courts have not been used for several years and are not fit for purpose. The car park requires a barrier to prevent fly tipping and unauthorised use of the site. The bar and kitchen areas require significant modernisation and the sports hall requires re-lamping. In addition to the health and safety risks posed by the condition of the site, the lack of available investment for modernisation means that the prospect of making the club commercially viable through additional private functions and increased bar usage is not realistic.
3. **Historic malpractice** – Until 2014 the club had been managed by an independent committee. An audit investigation showed irregularities in the club accounts and its financial processes, including cash handling and book keeping. At this time, management of the club transferred to the Council's Facilities Management team to ensure its compliance and protect both the club and Council from reputational risk. This is an additional activity that the Facilities Management team now performs with no budget and creates a distraction from its core role of ensuring that sites from which vital Council services are delivered (such as the care of vulnerable people) are fit for purpose and well maintained.
4. **Public responsibility** – while the Council will do everything reasonably possible to support resilient and cohesive communities, it has duties to manage public money responsibly, to ensure that services it provides are affordable and fit for purpose and to protect the public from risk of harm when using facilities it provides. The club as it is now does not meet the requirements of these tests and the council has a duty to consider alternatives.

## **Options Appraisal**

The available options for the future of the Sports and Social Club are:

1. Retain as is
2. Close the bar section of the club and retain the sports facilities
3. Consider the creation of an alternative delivery vehicle
4. Close the whole club and all of its facilities

These options were carefully considered with the intention to find the most suitable overall outcome for all stakeholders. Genuine and concerted efforts have been made to pursue options alternative to the closure of the club and, having fully explored and exhausted these, appraisal of the options was as follows:

### **Option 1 - Retain as is**

#### *Option rejected*

Under this option, the club and all of its facilities would remain open and would continue to be managed under the existing arrangements. This option is not considered feasible for the following reasons:

- **Lack of commercial viability** - there are too few paying members of the club and too little income from private bookings to render it commercially viable. Fees from the club's current 56 members generate £2,000 p.a., which covers just over 1% of the operating costs of the site. To break-even, the club would need either to:
  - Increase its membership to 1800 people;
  - Raise membership fees by 3000% to £1,169 per member;
  - Generate in excess of an additional £65,000<sup>1</sup> in private bookings. This equates to an additional 6 bookings per week or an increase in price above the current £200 per booking which, given the location and condition of the facilities, would price the club out of the market;
  - Or achieve a combination of the above.
- **Lack of available investment** – the club facilities are not fit for purpose; the sports changing facilities have recently been closed due to their poor condition and prohibitive cost of restoration (around £85,000). Without this investment, the facilities will continue to degrade to a point beyond restoration and to presenting significant health and safety risks.
- **Health and safety** – dangerous levels of asbestos are prevalent in some of the buildings and the structurally unsafe Pavilion building has now been demolished. Continued use of the site represents a significant health and safety risk which could result in severe injury or illness to users of the site, which includes members of the public as well as members of the club.

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<sup>1</sup> Note that additional bar staff are required for functions, therefore costs increase with each booking, meaning that more than the current £65,000 deficit would have to be generated in additional income to achieve a break-even position

## **Option 2 - Close the bar section of the club and retain the sports facilities**

### *Option rejected*

Under this option, the bar section of the club – which makes up the highest part of its costs – would be closed but the indoor and outdoor sports facilities would remain open.

This option is not considered feasible for the following reasons:

- **Lack of commercial viability** – although insufficient to cover overall costs, the income generated from private bookings and associated bar takings is by far the club's greatest revenue stream, generating £102,000 p.a. When adjusting for the reduction in costs from closing the bar, the subsidy required by the club would still be in the region of £32,000. This represents only the annual operating deficit and does not allow for investment in facilities.
- **Lack of available investment** – as per option 1, the lack of available investment for the site facilities would result in unrecoverable deterioration. As the main investment and maintenance needs are in the sports facilities, there is no advantage to closing only the bar.
- **Health and safety** – as per option 1, the continued deterioration of the site facilities would create significant health and safety risks.

## **Option 3 - Consider the creation of an alternative delivery vehicle**

### *Option rejected*

Under this option, the management of the club would transfer to an 'alternative delivery vehicle', in this case meaning a community group or company set up for the purpose of running the club such as a Community Interest Company or social enterprise.

This option was given very serious consideration and, following meetings in August 2016 with County Councillors, some club members and representatives from the football group, an agreement was reached that:

- The Council would cease all financial subsidy of the club from April 2017
- The Council would lease the club and site to a new legal entity to be in place from April 2017, governed by a clearly incorporated committee with a key role for County Councillors in its formation and operation
- The lease would be FRI (Fully Repairing and Insuring)
- Under the leadership of the new committee, the club would seek external funding for developing the changing facilities

Since this agreement was reached in September 2016, the Council has followed through on its obligations, including the drafting of the lease agreement. However, the transitional group made up of County Councillors and club members did not reach agreement on the future governance structure of the club; no legal entity or appropriate body has been formed to which the Council can legally or responsibly hand over management of the club and site.

The Council has held numerous meetings and invested a significant amount of time in supporting this process, which has gone beyond the original transition date of April 2017. This has resulted in an increased financial deficit, creating a burden on the public purse and the core business of the County Council.

Therefore, while supportive of this option in principle and hopeful that it would achieve a satisfactory outcome, this option is no longer considered feasible for the following reasons:

- **Lack of proof of concept** – the proposed model, including the new committee structure, could now have been in place for five months or longer, effectively providing a proof of concept. In the absence of the relevant groups having self-organised into a structure able to assume the necessary duties and liabilities, the Council has been unable to transfer management of the site to the community and has justifiable concerns that this cannot be achieved within a reasonable timeframe, given the ongoing financial pressure caused by the site.
- **Lack of available investment** – even with the creation of an eligible community organisation, there is no guarantee that the club would be able to secure the funding required both to invest in the site and to eliminate its financial operating deficit. Even with the leadership of a well organised and experienced community organisation, there is a high risk the levels of funding required will not be secured.
- **Risk of arms-length delivery** – the Council has had a mixed experience with alternative delivery models and, while some have been more successful than others, it is clear that arms-length delivery of services comes with its own set of risks and limitations. The formation of a separate legal entity creates with it additional costs, including the requirement to prepare a separate statement of accounts and additional insurances. An exceptionally strong business case is needed to demonstrate that these risks can be managed and that they are outweighed by the potential return. In this case, it has not been possible to demonstrate this or to show that a community organisation would be better placed to run the club and site.

#### **Option 4 - Close the whole club and all of its facilities**

*Option recommended*

Under this option, the club and all of its facilities would be closed, with the intention to do so from 31<sup>st</sup> October 2017.

While it has not been easy to reach this decision, this option has been recommended and agreed for the following reasons:

- **Fiscal responsibility** – the current budget pressure of £65,000 p.a. would be alleviated, ensuring that the Council can demonstrate responsible use and appropriate management of public money and that, in a time of extreme financial challenges, funding is channelled to core Council business and services.



- **Strategic investment** – the site is a prime location for long term development, including possible new homes or a facility for adult social care clients. Depending on which option (or mix of options is pursued), this could yield a land value of between £2.7m and £7.5m and improve the Council’s provision of core and statutory services. This is by far the most commercially viable option for the site, aligns to the Council’s financial strategy and supports the priorities of the Strategic Plan.
- **Risk management** – closure of the site in the short term and its sale for development in the long term mitigates the very significant health and safety risks presented by the site. Not only do these risks present real jeopardy to members of the club and of the public but, at their most extreme, could result in charges of corporate manslaughter against the Council or any community group involved in the management of the site.
- **Reasonable alternative provision** – there are suitable alternative sports facilities in close proximity to the site. While it is understandable that members of the club (and the Council) will regret its closure, the fact that there are suitable alternative facilities in the vicinity should mitigate the impact on the local community. Indeed, these facilities are more modern, more fit for purpose and better placed to meet the needs of the various sports groups that currently use the Sports and Social Club.

### Decision Making Process

It has not been an easy decision to close the Sports and Social Club but a significant amount of time has been spent by officers and Members in exploring all possible options. It is only after carefully evaluating these options and exhausting the credible alternatives that officers met with the Cabinet Member for Finance and Resources and local Members to discuss the recommendation to close the club. This meeting took place on 17<sup>th</sup> July 2017.

On 24<sup>th</sup> July, the Facilities Management team communicated proposals with the BCC staff working at the club, club members and other relevant groups, using the forums most appropriate for each stakeholder group. This provided an opportunity for those individuals and groups affected to comment on the proposals.

On 28<sup>th</sup> July, the Cabinet Member for Finance and Resources agreed to close the Bucks Sports and Social club and all its facilities. The decision was to defer closure until the end of October 2017 in order to honour bookings and allow time for clubs to transition to new locations. In making this decision, the Cabinet Member took into account the representations that had been received.

## **Community Impact and Alternative Provision**

In taking this difficult decision, officers and Members of the Council are very mindful of the impact this will have on the community groups using the club site. While it is regrettable that members who enjoy the social aspect of the club will no longer have access to the facility, clearly the Council cannot continue to subsidise a members' bar and the main concern has therefore been to identify alternative provision for the various sports groups.

The Sports and Social Club is located in Stoke Mandeville, which has a rich sporting heritage and is home of the Paralympic Legacy. Stoke Mandeville Stadium is less than half a mile from the club and provides sports and leisure facilities of the highest quality for all users, from occasional users to professional sportspeople.

There are also 13 registered football pitches in the local area, most of which have access to changing facilities.

All of these facilities are more modern and fit for purpose than the Sports and Social Club site and represent more sustainable options for the relevant groups.

## Appendix 1: Financial Analysis of Options

	Option 1 (Retain as is)	Option 2 (Close the bar section, retain sports facilities)	Option 3 (Consider the creation of an alternative delivery vehicle)	Option 4 (Close whole site)
<b>Expenditure</b>				
Bar staff costs	30,000.00	0.00	0.00	0.00
FM Management	8,000.00	5,000.00	0.00	0.00
Site Manager	32,000.00	0.00	0.00	0.00
Mobile maintenance	0.00	12,000.00	0.00	0.00
Repairs	8,000.00	8,400.00	0.00	0.00
Utilities	10,000.00	7,000.00	0.00	0.00
Security	0.00	0.00	0.00	0.00
Supplies (beer, food)	54,000.00	0.00	0.00	0.00
Grounds maintenance	6,000.00	6,000.00	0.00	0.00
TV screens	1,700.00	0.00	0.00	0.00
Cleaning	4,800.00	3,000.00	0.00	0.00
Insurance	0.00	0.00	0.00	0.00
VAT	16,000.00	0.00	0.00	0.00
Changing rooms	0.00	0.00	0.00	0.00
<b>Total:</b>	<b>170,500.00</b>	<b>41,400.00</b>	<b>0.00</b>	<b>0.00</b>
<b>Projected Income</b>				
Rent/Lettings	0.00	2,000.00	0.00	0.00
Sports	1,000.00	6,000.00	0.00	0.00
Functions (hall hire) and bar takings	102,000.00	0.00	0.00	0.00
Hall activities	0.00	1,000.00	0.00	0.00
Memberships	2,000.00	0.00	0.00	0.00

<b>Total:</b>	<b>105,000.00</b>	<b>9,000.00</b>	<b>0.00</b>	<b>0.00</b>
<b>Total profit or loss</b>	<b>-65,500.00</b>	<b>-32,400.00</b>	<b>0.00*</b>	<b>0.00</b>

\* Note that these figures show the cost to the County Council, which would be zero by virtue of having transferred all costs and liabilities to a new, community based organisation. However, these liabilities would be borne by the new organisation and there is significant risk of not being able to secure funding for the needed improvements to the site. The projected loss should therefore, for all practical purposes, be considered as at least equal to option 1 (£65,500).



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**Appendix 2A  
Finance, Performance and Resources  
Select Committee**

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# Buckinghamshire County Council Select Committee

Finance, Performance and Resources Select Committee

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## Report to the Finance, Performance and Resources Select Committee

<b>Title:</b> Update	Bucks Sports and Social Club - Call-in
<b>Committee date:</b>	Tuesday 19 December 2017
<b>Author:</b>	Gillian Quinton
<b>Contact officer:</b>	Deb Clarke, 01296 382714, <a href="mailto:debclarke@buckscc.gov.uk">debclarke@buckscc.gov.uk</a>
<b>Cabinet Member sign-off:</b>	John Chilver – Cabinet Member Resources

### Purpose of Agenda Item

Information: Provided to enable the select committee to scrutinise a specific issue or inform the development of the work programme

### Background

In July 2017, the Cabinet Member for Resources made a decision (R04.17) to 'close all buildings and external facilities of the Bucks Sports and Social Club'.

This decision was 'Called In' by Cllr Brian Roberts, supported by Cllr Niknam Hussain and Cllr Julie Ward for review.

A special Select Committee meeting was arranged at which the Committee Members reviewed the decision on Tuesday 12 September 2017.

As a result the Committee proposed that the Cabinet Member decision should

- **be referred back to the Cabinet Member for Resources for reconsideration and advocated that Option 3 (see below) in the original report should be revisited**
- **The Committee also proposed that the Cabinet Member for Resources should have further discussions with local Members and the Club Committee over a**



**period of three months and then report back to the Select Committee on his decision.**

- **The Cabinet Member for Resources agreed to this proposal.**

Under Option 3, the management of the club would transfer to an ‘alternative delivery vehicle’, in this case meaning a community group or company set up for the purpose of running the club such as a Community Interest Company or social enterprise.

A summary of issues raised at the meeting (taken from the minutes) held on 12<sup>th</sup> September 2017 is below and the action taken to respond to those issues (where reasonably practicable) is also below

<p>In September 2016, Brian Roberts attended a meeting to discuss possible reforms to the Bucks Sports and Social Club and a potential lease arrangement. By the end of November 2016, the lease should have been prepared but nothing happened.</p>	<p>These matters are an account of historical actions or inactions</p>
<p>In March 2017, club staff raised a number of concerns with Brian Roberts as their local County Councillor and he took these issues to the Cabinet Member and relevant officers and suggested a further meeting should be held. Mr Roberts continued to press for Officers to meet with Members and Club Members, but this didn't happen.</p>	
<p>Finally on 24<sup>th</sup> July 2017, two officers met with two club staff but the Cabinet Member decision recommending closure of the club had been published on 19<sup>th</sup> July, to be taken on or after 27<sup>th</sup> July.</p>	
<p>It appeared that a draft lease had been prepared and a business case had been put together with a view to turning the club's fortunes around and club members believed that this was being progressed.</p>	
<p>Whilst Mr Roberts fully acknowledged that Buckinghamshire County Council faced financial challenges, he believed that local residents were right to raise concerns about a lack of engagement and consultation around the possible closure of the Club. Stoke Mandeville Parish Council only heard about the possible closure on local radio station, Mix 96 which Mr Roberts felt was unacceptable. Over 800 people had signed a petition opposing the club's</p>	<p>A letter regarding the future of the club was sent to all identified stakeholders.</p> <p>The letter contained an invitation to make proposals regarding the future of the club. Two proposals were received and evaluated.</p> <p>Stoke Mandeville Parish Council</p>

closure.	was sent the letter but did not respond. SMPC was chased twice by phone.
There were a number of inaccuracies in the report, particularly around the membership figures. The report claimed there were only 56 members, but the level of representations made on this decision illustrated the number of people who use the club regularly, many of whom had been advised that they could not become members currently.	The current membership is only those members of staff of BCC who continue to pay membership fees. Each individual was sent the letter referred to above.
There had been no consultation with local Members or the Greater Aylesbury Local Area Forum ahead of the Cabinet Member Decision report being published and no public consultation feedback had been included in the Cabinet Member report, despite the report template clearly indicating that consultation feedback should be included. There was also no evidence that an Equalities Impact Assessment had been undertaken.	Cllr Roberts, the County Ward Member was consulted and communicated with throughout the consultation period and attended multiple meetings with officers and the Cabinet Member for Resources. Cllr Roberts is Chairman of the LAF. The deputy chairman of the LAF was also sent the letter, and was invited to meet with officers for a briefing in his role as Leader of the Opposition in the County Council. Unfortunately his diary did not allow.  An Equalities Impact Assessment has been carried out and is appended to this report.
Wes and Mel Personal Training (WMPT Sparks) currently delivered their fitness classes at the Club and had been told that their bookings would be honoured to April 2018, although the Cabinet Member Decision stated bookings would only be honoured until 31 <sup>st</sup> October 2017.	This is a matter of record
There was a risk to the Council's reputation due to the lack of consultation.	The Cabinet Member for Resources has made every effort to consult with stakeholders on his decision.
Between 2003 and 2012, the Club was producing an average annual surplus of £24,500. In recent years, since the BCC Facilities Management team had been	This is a matter of record. The club has not been in surplus since it was taken over by the County Council.

<p>managing the Club, there had been a financial deficit of -£5,500 in 2015, - £25,000 in 2016 and -£64,500 in 2017.</p>	
<p>Club members recognised that it was not part of the Council's core business and agreed that the current situation was unacceptable. In 2016, two former County Councillors had offered to represent the Club Committee and put their case forward, which included offering to take on the lease of the club by forming a legal entity to allow this and a schedule of works for the site which included investing in new changing rooms. Subsequently it was discovered that the Councillors had not presented these ideas and had turned down an invitation to establish a Community Interest Company (CIC).</p>	<p>This is a matter of record.</p>
<p>Club Members had now incorporated as a CIC, lease terms had been drawn up and they had investigated options for new changing rooms. They believed that they could increase the membership and revenue the Club produced and asked for this opportunity, as set out in Option 3 of the Cabinet Member Decision report to be considered.</p>	<p>Members of the community and the club have put in a business case to run the Club, as they were invited to do.</p> <p>Unfortunately, it is believed that this bid represents too great a risk to the County Council of a continuing need for financial support.</p>
<p>The Localism Act 2011 allowed facilities to be registered as an Asset of Community Value. In 2015, Stoke Mandeville Parish Council wanted to nominate Bucks Sports and Social Club as an Asset of Community Value and was advised by Buckinghamshire County Council's (BCC) Estates department not to proceed. The Parish Council agreed to reconsider but ultimately decided to submit a bid, which was accepted by Aylesbury Vale District Council in May 2015 and BCC was notified.</p>	<p>This is a matter of record.</p> <p>When a site has been listed as an Asset of Community Value it is subject to certain regulations. If the owner decides to dispose of the asset either through freehold sale or granting a qualifying lease of 25 years or more, this would trigger a period of consultation. In this instance, BCC had not decided to dispose of the site.</p>
<p>On 21<sup>st</sup> July the Parish Council was alerted from a report on local radio that there was</p>	<p>As previously, all identified</p>

<p>a plan to close the Bucks Sports and Social Club. The Cabinet Member report was then obtained and Mrs Hunt, Chairman of Stoke Mandeville Parish Council contacted the Cabinet Member to make representations and to complain about lack of consultation. There has been plenty of opportunity to consult the Parish Council and the users of the Club. Mrs Hunt asserted that BCC had failed to follow Government guidelines on public consultation.</p>	<p>stakeholders including Stoke Mandeville Parish Council were sent the consultation letter.</p> <p>Stoke Mandeville Parish Council was contacted on two occasions subsequently to ascertain whether they wished to respond.</p>
<p>Mr Hussain advised that the green space of the Club site helped BCC with its duty around Health and Wellbeing and was well-used by the whole community, including Booker Park School who used the playing fields for their sports lessons.</p>	<p>Booker Park school did respond to the consultation so there has been a dialogue with the school about the reciprocal arrangements that exist. These will continue in the near future and discussions are continuing. They are not affected by a decision to close the club.</p>
<p>Mrs Ward reiterated concerns about reputational risk to the Council due to a lack of engagement around the proposal to close the Club, which was widely used.</p>	<p>As previous.</p>
<p>There had been mismanagement and miscommunication at the Club over the past couple of years, particularly in connection with diary management for bookings.</p>	<p>It is acknowledged that there have been issues with bookings and diary management and a system which puts all bookings through Facilities Management has been instituted.</p>
<p>400 people recently attended a Fun Day event at the Club, 190 people would like to become Members and the Committee was confident that if they could replace the changing rooms they could further increase the membership.</p>	<p>This is part of the communities' bid to take over management of the club.</p>
<p>Up to 2014, the Club had been run well and the Council published the Club's accounts up to this point. BCC took over the management of the Club in 2014, due to financial impropriety at the Club by a member of BCC staff who was no longer working there.</p>	<p>Not relevant to the current decision.</p>
<p>The Club had previously been open six</p>	



<p>nights a week and during the day at the weekends – this level of activity had reduced since BCC took over. The Air Ambulance landed there and clients from the Spinal Injuries unit at Stoke Mandeville also used the Club to socialise.</p>	<p>This is part of the communities' bid to take over management of the club.</p> <p>Discussions with Stoke Mandeville Hospital about the potential uses of the site are ongoing, but they are not affected by the decision to close the club</p>
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Cllr Chilver responded to the Call In decision by writing a letter which is Appended at A. to all key stakeholders and interested parties which included; BSSC Members; Local Councillors; Staff; Stoke Mandeville Parish Council; Booker Park School, the Chair and Vice Chair of the LAF, Suppliers and Users. A full list of those who were written to is appended at B.

The letter (appended at A) explained the purpose of the consultation and it gave stakeholders the opportunity to have meetings with Cllr Chilver, send through any questions or concerns to a dedicated Bucks Sports and Social Mailbox and asked for any viable proposals to keep the club from closure with responses required by Monday 20 November.

Over this period of time various meetings, telephone conversations and emails took place with the Cabinet Member for Resources. In the end, two organisations submitted proposals for the future of the club.

In addition, officers have discussed with Booker Park School the usage of the car parking facilities and field usage. This was a historic reciprocal arrangement established some years ago. Both parties now have an open channel to discuss any changes that affect usage in the future.

Stoke Mandeville Parish Council has also been contacted separately to ensure they had received the consultation letter and whether they required a specific meeting with the Cabinet Member for Resources to discuss their concerns however there was no request for further information.

With regard to the two proposals that were received, an independent evaluation panel consisting of Legal, Finance and Procurement professionals was established. The panel reviewed the proposals. They have provided a report on their expert opinion to Cllr Chilver.



## **Decision**

Following this consultation and the advice of the evaluation panel, the Cabinet Member for Resources has concluded that his decision will still stand in regards to closing the Bucks Sports and Social Club.

In deciding that his decision will stand, the Cabinet Member for Resources has taken into account the following factors:

- Full consultation has been carried out
- The County Council has does not have responsibility for the provision of leisure and/or sports facilities
- The advice of the independent panel of experts that neither of the two plans put forward represented an acceptable level of risk to the County Council
- The financial circumstances of the Council
- The value of the total asset and the possible future uses of the site
- The equality impact assessment did not identify any detrimental impact to particular groups

## **Resource implications**

The financial and resource implications are set out against all the options detailed in the report that was submitted for the 12<sup>th</sup> September 2017 Select Committee meeting.

## **Next steps**

The Cabinet Member for Resources will confirm his decision to close the club.

Officers will discuss with members of the community and the local Member when this should take effect as there is a booking for a New Year's Eve party which could go ahead if wished. The club will close no later than January 15<sup>th</sup> 2018.

Appendix A – letter sent

To all stakeholders and interested parties in Bucks Sports and Social Club

I am writing to set out the next steps in relation to the Bucks Sports and Social Club.

As you are aware, I agreed with the request of the Select Committee which was as follows:

- The Committee unanimously agreed that the decision should be referred back to me for reconsideration and advocated that Option 3 in the original report should be revisited
- The Committee also proposed that I should have further discussions with local Members and the Club Committee over a period of three months and then report back to the Select Committee on his decision. I agreed to this proposal.

Under Option 3, the management of the club would transfer to an 'alternative delivery vehicle', in this case meaning a community group or company set up for the purpose of running the club such as a Community Interest Company or social enterprise.

During 2016 we invested a significant amount time supporting this option, however unfortunately an appropriate body was not formed before the deadline of April 2017 to which the Council could hand the club over to. This was due to a number of issues, which were outlined to committee in our report.

Our conclusion was that Option 3 was no longer considered feasible.

The County Council continues to face financial pressures and needs to ensure the effectiveness and efficiency of all its expenditure.

Delivery of community based sports and social facilities are not a statutory responsibility of the County Council. There is no option on the table to redevelop the site or any part of it – our advice is that this will not be viable in the short to medium term. So the Council must focus its attention on the future prospects of the site being developed in a sustainable and cost neutral way.

I know there is a strongly held view amongst key stakeholders that the club can be viable, but this has not yet translated into anything that could be relied upon to enable the Council to keep the club open and hand the management over.

This situation cannot be allowed to continue indefinitely, and therefore, in order for me to report back on my decision to the Select Committee in December I am consulting all interested parties and stakeholders with a view to understanding if there is any meaningful prospect of the club being able to sustain itself independently going forward.

However, if there is no such plan then regrettably I will have to confirm my decision to close the club.

I am available to discuss this matter with any individuals or groups who would find that helpful and officers will also be made available to ensure that there is full understanding of



what is being consulted on and what the options are. Of course, adequate notice will need to be given in order to make myself and/or officers available.

Councillor John Chilver

Executive Member for Resources



## Appendix B – who the letter went to

### Clients / Users:

- Archery
- Aylesbury Motorcycle Training
- Aylesbury Pigeon Club <;
- Badminton
- Badminton Wednesday ;
- Bucks Athletic Association
- Football
- Keep Fit
- Kids Club ;
- Whizz Kids ;
- Wingrave Swan
- WMPT Fight Club
- As well as 7 staff members
  
- 3 suppliers
  
- Booker Park School
  
- Stoke Mandeville Parish Council (who were also rung on a couple of occasions to see if there was any response)
  
- Cllr Brian Roberts
- Cllr Stephen Lambert
  
  
- about 40 members of staff who are paying subs from payroll
  
- Aylesbury Town Football Club



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**Appendix 2B  
Meeting minutes**

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# BCC Finance, Performance and Resources Select Committee

## Tuesday, 19th December, 2017 10.00 am

### Minutes

The Chairman welcomed Mr John Chilver, Cabinet Member for Resources, Mrs Gill Quinton, Executive Director, Resources, Ms Deb Clarke, Interim Director of Organisational Development and Human Resources (OD&HR) and Mr Richard Ambrose, Director of Finance and Assets to the meeting.

The Chairman also welcomed Ms Sara Turnbull, Head of Democratic Services and the Council's Statutory Scrutiny Officer, who reminded Members that the Call-in process enabled the Select Committee to provide a robust check and challenge to decisions taken by Cabinet or Cabinet Members. The Call-in had been concluded at the 12<sup>th</sup> September meeting when the Committee recommended that the Cabinet Member should reconsider his decision to close the Bucks Sports and Social Club and in particular should reconsider Option 3, which was to consider transferring the management of the Club to an Alternative Delivery Vehicle, for example, a Community Interest Company.

The Chairman asked the Cabinet Member to outline the process he had undertaken following the 12<sup>th</sup> September meeting. During the presentation and in answer to subsequent Members' questions the following main points were noted:

- Following the 12<sup>th</sup> September meeting, the Cabinet Member had written to interested parties to invite them to submit proposals to take over management of the Bucks Sports and Social Club. A deadline of 20<sup>th</sup> November 2017 was set. A dedicated email address for consultation had been established.
- The Cabinet Member had regular meetings with the local Member to keep him updated throughout the process.
- Two proposals were received by the deadline and these were evaluated by an independent panel comprising of Legal, Procurement and Finance professionals.
- The Interim Director of OD & HR explained that she had met with the Bucks Sports and Social Club Members group, along with the Cabinet Member and on one occasion with the Commercial Director, to explain the required format for their submission and to answer any questions. She and the Cabinet Member met with the group approximately six times.
- Once the bids were received they were evaluated by the panel. The Cabinet Member advised that he chose not to look at the submissions in detail as he wanted the independent panel to evaluate them.
- Both bids had areas where further information could have been helpful and one bid did not include Profit and Loss details.
- However the view of the evaluation panel was that the community bid was over-optimistic about potential income levels, whilst also being unrealistic about costs. The Profit and Loss projected a very slim profit margin for the Club which meant that it would be difficult to build up any reserves for the future.
- The Director of Finance and Assets confirmed that he agreed with the financial assessment of the submissions. The business case from the Sports and Social Club members was very full but the financial risks to the Council remained. Assumptions around income and membership levels were optimistic and although the submission outlined various grants and donations that the Club hoped to secure, there was little evidence to support this. A very small surplus was forecast for the first two years but with no reserves the sustainability of the club was questionable.
- A Member expressed concerns that the community bidders may not have received sufficient advice for preparing their bids and the evaluation panel had not been adequately briefed. The

Director of OD and HR reiterated that one of the bids had been well-supported with a number of meetings with the Cabinet Member and officers. The Council had not been aware that a second bid was being prepared, but when that submission was received the deadline was extended to allow it to be reformatted to meet the requirements, but the bidder asked for the submission to be evaluated as it stood.

- In the interests of transparency, a Member asked for confirmation that all documents had been shared with the Committee. The Cabinet Member confirmed that all relevant information had been shared.
- A Member queried if the evaluation panel had asked for further information from either of the bidders. It was confirmed that the panel felt that on balance they could still reach a conclusion based on the information they had and they did not want to ask the groups to undertake further work.

In light of this discussion, the Chairman asked the Cabinet Member for Resources to confirm his decision. The Cabinet Member advised that as the evaluation report concluded that both bids represented an unacceptably high risk to the Council, the original decision to close the Bucks Sports and Social Club would still stand.

The Cabinet Member paid tribute to both bidders for the work they had put into their submissions and he thanked everyone who had submitted written representations. In reaching this decision, in addition to the results of consultation, the Cabinet Member had taken into account the evaluation panel's advice, the Equalities Impact Assessment, the Council's overall financial position and the fact that it was not a statutory duty for the Council to provide leisure facilities. The Cabinet Member thanked all the officers and the members of the Select Committee who had been involved in this process.

A Member commented that whilst he believed the decision to be the right one on financial grounds, local residents might still feel a sense of injustice because of the original lack of consultation which had been highlighted by the Committee at its 12<sup>th</sup> September meeting. It was suggested that the public might find it easier to accept the decision if feedback around the risks could be provided.

In conclusion, the Chairman commented that it was a difficult balance between commercial sensitivity and the need for transparency and openness. The Committee had played its part by scrutinising the original decision and recommending that it should be reconsidered.

**Sports pitches/recreational facilities: Southeast Aylesbury/Stoke Mandeville**

