



South Bucks
District Council

**South Bucks Core Strategy
Development Plan Document (DPD)
Publication Stage Representation Form**

Ref:
29
(For official
use only)

Name of the DPD to which this representation relates: South Bucks Core Strategy

Please return to South Bucks District Council, by 5pm on Wednesday 12th May 2010
 By post to: Planning Policy Manager, South Bucks District Council, Capswood, Oxford Road, Denham, FREEPOST SCE9630, UB9 4BR or
 By e-mail to: LDF@southbucks.gov.uk or
 By fax to: 01895 837269
 If you have any queries, please contact the Planning Policy Team on 01895 837200.

This form has two parts -
 Part A - Personal Details
 Part B - Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details* See note below 2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title	Ms	
First Name	Christine	
Last Name	Ide	
Job Title (where relevant)	Senior Planning Officer	
Organisation (where relevant)		
Address Line 1		
Line 2		
Line 3		
Line 4		
Post Code		
Telephone Number		
E-mail Address (where relevant)		



Important: Please note that your comments and personal details will be available for public inspection and therefore cannot be treated as confidential. Please make sure that you only give information that you are happy for others to see.

Part B - Please use a separate sheet for each representation

Name or Organisation : Defence Estates on behalf of Ministry of Defence

3. To which part of the DPD does this representation relate?

Paragraph	<input type="text"/>	Policy	<input type="text"/>	Proposals Map	Wilton Park, Beaconsfield (Appendix 7)
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4. Do you consider the DPD is :

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

If you have entered No to 4.(2), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is unsound because it is not:

(1) Justified	<input type="checkbox"/>
(2) Effective	<input type="checkbox"/>
(3) Consistent with national policy	<input type="checkbox"/>

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible.
If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

The proposal to widen the boundary of the Major Developed Site at Wilton Park as shown in Appendix 7 of the Core Strategy Submission document is supported and welcomed as it potentially offers more flexibility in the layout of the future development of the site.

(Continue on a separate sheet / expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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No, I do not wish to participate at the oral examination

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9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

(Continue on a separate sheet / expand box if necessary)

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Signature:

Christine Ide

Date:

11.5.10

Thank you for your comments.

We also encourage you to complete and return the Equal Opportunities Monitoring form to help us to monitor inclusivity. The information collected on this form will not be attributed to you, as you don't have to provide your personal details.

Notification Request

Please complete the following if you wish to be notified of any of the following:

I request to be notified of


The submission of the Core Strategy for independent examination

The publication of the recommendations of any person appointed to carry out the independent examination of the Core Strategy

The adoption of the Core Strategy

Please specify the address to which the notification should be sent to if it is different from the one given in the front page.

CID 1302
RN 2014, 75, 76, 77

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First Name	Christine	
Last Name	Ide	
Job Title (where relevant)	Senior Planning Officer	
Organisation (where relevant)	South Bucks District Council	
Address Line 1		
Line 2		
Line 3		
Line 4		
Post Code		
Telephone Numt		
E-mail Address (where relevant)	christine.ideal@sbdc.gov.uk	

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Part B - Please use a separate sheet for each representation

Name or Organisation : Defence Estates on behalf of Ministry of Defence

3. To which part of the DPD does this representation relate?

Paragraph Policy Proposals Map

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4.(1) Legally compliant

Yes

No

4.(2) Sound

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No

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Paragraph 3.6.9 of the Core Strategy states that the existing sport and recreation facilities at Wilton Park should be 'retained', with qualitative improvements where appropriate in accordance with Core Policy 5.

The Ministry of Defence (MOD) is concerned about this reference to retain existing recreational and sports facilities. The retention of built sports facilities within the main built part of Wilton Park in their current location would significantly constrain future options for development on the site. Maximum flexibility in the redevelopment of the site is essential in order to deliver an optimal site layout and a deliverable scheme.

The wording of Core Policy 14 refers in the third bullet point to the retention of the existing 'level' of sports and recreational facilities. This requirement is considered to be more acceptable; subject to consistency with the provisions of Circular 05/2005 'Planning Obligations'.

It is considered therefore that the wording of paragraph 3.6.9 should be amended to reflect that in Core Policy 14; and refer to the retention of the existing 'level' of sports and recreational facilities.

It is also noted in paragraph 3.6.9 that the site at Wilton Park is expected to address existing deficiencies in open space in Beaconsfield. Any such requirement would need to be consistent with the provisions of Circular 05/2005 'Planning Obligations'.

(Continue on a separate sheet / expand box if necessary)

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The wording of paragraph 3.6.9 should be amended to reflect that in Core Policy 14 and refer to the retention of the existing 'level' of sports and recreational facilities at Wilton Park, Beaconsfield.

(Continue on a separate sheet / expand box if necessary)

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8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

In order to present the most up to date information that is available pertaining to the future development of Wilton Park.

(Continue on a separate sheet / expand box if necessary)

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Signature:

Christine Ide

Date:

11.5.10

Thank you for your comments.

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Notification Request

Please complete the following if you wish to be notified of any of the following:

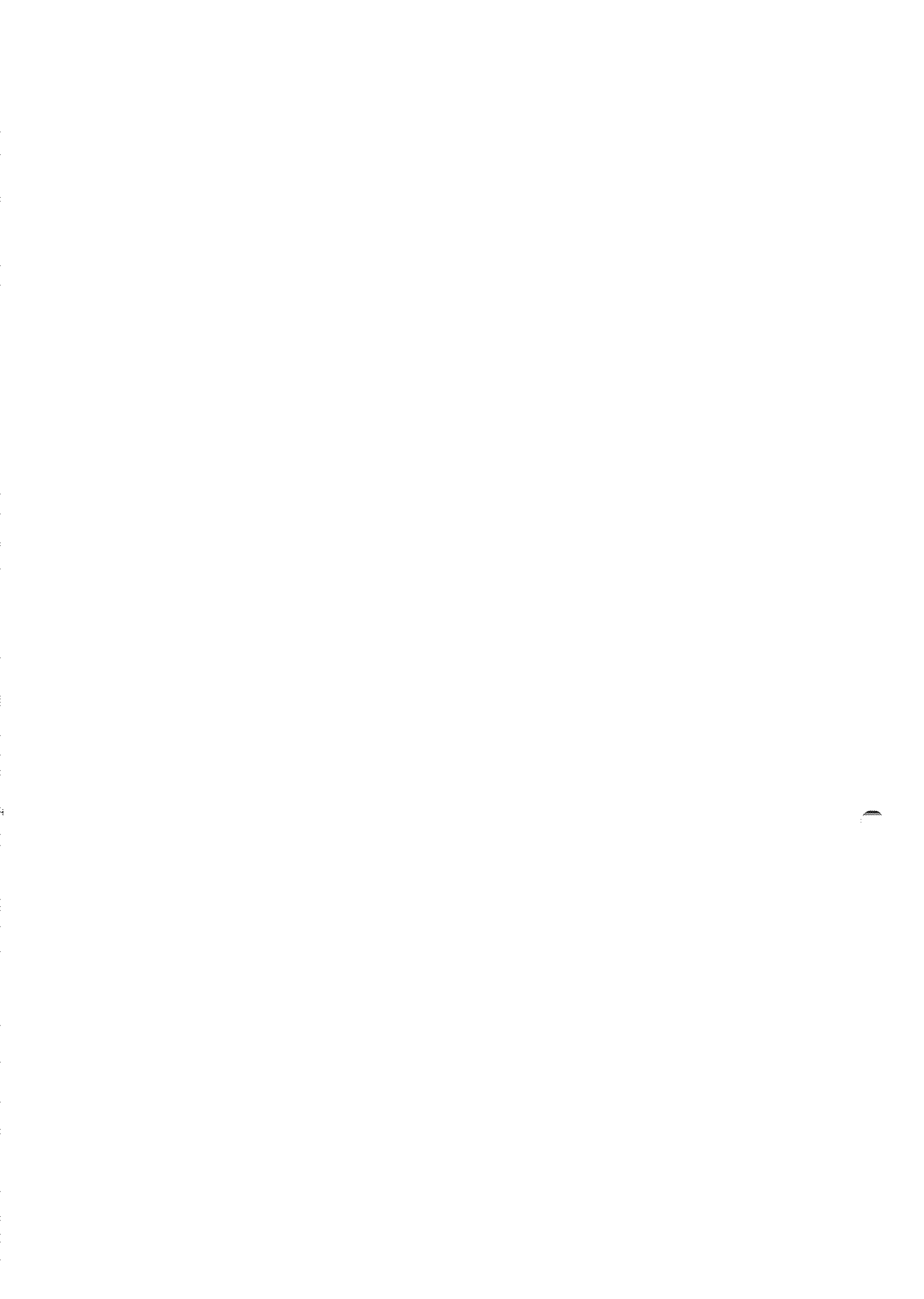
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Organisation (where relevant)		
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Line 4		
Post Code		
Telephone Nu		
E-mail Address (where relevant)	christine.ide@doe.mad.uk	

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Part B - Please use a separate sheet for each representation

Name or Organisation : Defence Estates on behalf of Ministry of Defence

3. To which part of the DPD does this representation relate?

Paragraph Policy Proposals Map

4. Do you consider the DPD is :

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

If you have entered No to 4.(2), please continue to Q5. In all other circumstances, please go to Q6.

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(2) Effective

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The Ministry of Defence (MOD) welcomes the acceptance in principle of retaining the same overall quantum of floorspace through any redevelopment scheme at Wilton Park (paragraph 3.6.8 of the Core Strategy Submission document). This is in accordance with the guidance on Major Developed Sites set out in Planning Policy Guidance 2 'Green Belts'.

Paragraph 3.6.7 of the Core Strategy states that the Wilton Park site could deliver 'around 300 dwellings', along with new employment floorspace, if the 'whole' of the site is released for redevelopment.

This statement is not strictly accurate. The estimated output from the site of approximately 300 dwellings relates not to the 'whole' site but to a more limited area.

The figure of 300 dwellings is based on the redevelopment of the built up areas within the current Major Developed Site boundary set out in the adopted South Bucks District Local Plan 1999, and excludes the Service Family Accommodation on site (source: 'Core Strategy Emerging Approach' South Bucks District Council March 2009). The current boundary of the Major Developed Site is drawn more tightly than that now being proposed in the Core Strategy, and potentially the site could yield more than 300 dwellings.

The MOD welcomes the statement in the final sentence of paragraph 3.6.7 that the precise scale and proportion of the uses on the site will be subject to an assessment of need when it comes forward.

Given the requirements listed in Core Policy 14 which are needed to bring the Wilton Park site forward, the MOD has concerns about the viability and deliverability of a scheme on the site. It is therefore considered that the wording of paragraph 3.6.7 should be amended to refer to a

'minimum' of 300 dwellings being provided on the site as the number of dwellings to be provided may need to be increased in order to achieve a viable scheme.

Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The text in paragraph 3.6.7 should be amended to reflect the fact that a minimum of 300 dwellings will be delivered from the Wilton Park Opportunity Site, excluding the area currently occupied by the Service Family Accommodation.

(Continue on a separate sheet /expand box if necessary)

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In order to present the most up to date information that is available pertaining to the future development of Wilton Park.

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Christine Ide

Date:

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Part A

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Title	<input type="text" value="Ms"/>	<input type="text"/>
First Name	<input type="text" value="Christine"/>	<input type="text"/>
Last Name	<input type="text" value="Ide"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="Senior Planning Officer"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text"/>	<input type="text"/>
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text"/>
Telephone Num	<input type="text"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text" value="christine.ide@southbucks.gov.uk"/>	<input type="text"/>



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Part B - Please use a separate sheet for each representation

Name or Organisation : Defence Estates on behalf of Ministry of Defence

3. To which part of the DPD does this representation relate?

Paragraph Policy Proposals Map

4. Do you consider the DPD is :

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If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

The Ministry of Defence (MOD) welcomes the inclusion of Wilton Park, Beaconsfield within the Core Strategy as an 'Opportunity Site' and Major Developed Site in the Green Belt; and fully supports the inclusion of Core Policy 14 which facilitates the redevelopment of the site.

The MOD is keen to work with the Council to bring forward a scheme on the Wilton Park site that is both viable and deliverable.

The MOD has concerns however regarding the viability and deliverability of development on the site given the requirements set out in Core Policy 14; for example the demolition of the tower block; a possible access onto the Pyebush roundabout across third party land to be constructed to a standard capable of future upgrading; and the provision of some employment development. Some exceptional development costs will have to be incurred in order to bring the site forward.

The 'Development Economic Analysis of Proposed 'Opportunity Sites' in the South Bucks Core Strategy' dated March 2010 and produced as part of the Core Strategy evidence base sets out development costs for the Wilton Park site based on a number of assumptions. Some costs which would be incurred in order to meet the requirements of Core Policy 14 do not appear to be included in the report – for example the cost of demolition of the tower block and the cost of the 'ransom strip' in order to provide a new access road over third party land.

It is considered that Core Policy 14 should contain a more general recognition of the need to facilitate a viable and deliverable development. The acknowledgement of this in the policy text in relation to energy (ninth bullet point) is welcomed and it is considered that this wording should be incorporated into the preamble to Core Policy 14, prior to the list of criteria.

(Continue on a separate sheet / expand box if necessary)

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Wording should be included in the preamble to Core Policy 14 to the effect that the requirements set out in the listed criteria will be subject to considerations of viability and feasibility.

(Continue on a separate sheet / expand box if necessary)

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