

Planning Policy  
Aylesbury Vale District Council  
The Gateway  
Gatehouse Road  
HP19 8FF

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Dear Sir/Madam,

### **Ickford Neighbourhood Plan – Pre-Submission Consultation**

Thank you for consulting Buckinghamshire County Council (BCC). BCC welcomes the opportunity to comment on the Ickford Neighbourhood Development Plan Regulation 16 consultation.

Many of the comments made in this response have been reiterated from BCC's pre submission consultation response. It is advised that BCC's responses to the pre-submission consultation are revisited. Our main comments include Transport Strategy, Highways, Ecology and Strategic Flood Management.

Our comments are set out below:

#### **Transport Strategy**

##### The Strategic Policy Context, para 2.2

The consultation on the Oxford Cambridge Expressway was paused due to the General Election, with an announcement expected in 2020. The final sentence should be changed to reflect this.

##### Other Forms of Transport

To reiterate the point made during the pre-submission consultation, BCC is supportive of improvements to cycling and walking infrastructure where appropriate. Given points 10.9 and 10.10, it is surprising that Policy TT1 does not include any specific measures to improve off-road pedestrian or cycling provision. Buckinghamshire Highways Development Management Guidance describes how pedestrians and cyclists should receive prioritisation in new development design<sup>1</sup>.

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<sup>1</sup> <https://www.buckscc.gov.uk/media/4512690/highways-development-management-guidance.pdf>

## Policy TT1: Traffic and Transport

Noting the point made during the pre-submission consultation, traffic calming measures usually require a TRO, and therefore also require a public consultation. As such, it is not appropriate to state that they “will be required”. An explanation of the reasons for this was provided in response to the pre-submission consultation. The document should instead state “consideration should be given to traffic calming.”

Whilst recognising the addition of some detail from BCC and AVDC parking guidance since the pre-submission consultation draft, there are some further aspects of parking design from this Guidance which should be acknowledged in the policy TT1. In particular, the need for storage space for bicycles should be included, i.e. suitable garage, a shed, separate cycle space, or back gardens with adequate accessibility. An additional 20% of the total number of spaces should also be included for unallocated or visitor parking. Readers should be referred to the Buckinghamshire Countywide Parking Guidance<sup>2</sup>

During the pre-submission consultation, BCC recommended inclusion of the School Travel Plan process as part of Ickford’s transport policy. School Travel Plans have not been included in the current version of the Ickford Neighbourhood Plan; therefore this earlier recommendation stands.

### **Highways**

#### Highway Sustainability

The Highway routes passing through the parish including Bridge Road, Sheldon Road and Worminghall Road are unclassified roads. Sheldon Road and Worminghall Road are served by public bus routes; however these are infrequent with the 110 bus service only running four times per day from Monday to Friday, and this service takes up to one hour to get to Aylesbury. There is no access to rail services within the parish, as the nearest train station is Haddenham and Thame Parkway, which is 15 minutes’ drive away; and there are no direct bus services to this station. As a result, within the consideration of sustainability related to the publically maintained highway, BCC consider the sites within the vicinity of, or with footway links to Bridge Road, Sheldon Road and Worminghall Road to provide a poor level of sustainability.

The parish is generally well served by footpaths that allow pedestrians to walk safely to the sustainable transport links in the centre of the village along Sheldon and Worminghall Roads. However, footpaths are generally only found on one side of the road, resulting in frequent road crossings. There is a primary bottleneck near Ickford School as the high volume of school traffic and parked cars from parents on the road can result in this part of Sheldon Road becoming difficult to pass through. The local buses can find it difficult to travel through this part of the village as parent’s cars can often block parts of the road. The limited forward visibility and an absence of pedestrian crossings at the junction between Sheldon Road and Bridge Road results in an unsafe situation for pedestrians (who will primarily be school children) attempting to cross the road. Furthermore, there are concerns at the southernmost point of Ickford around Ickford Bridge as many Heavy Goods Vehicles tend to use the village as a cut through, as opposed to using Mill Road in Shabbington (which is undergoing repairs). As a result, the structural integrity of the bridge is slowly being compromised.

Whilst it is noted that footpath links exist between the majority of residential streets within the village and Sheldon Road / Worminghall Road / Bridge Road, these are subject to less natural surveillance, a lack of all-weather surfacing materials, and are not served by lighting.

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<sup>2</sup> <https://www.buckscc.gov.uk/media/4511592/parking-guidance-september-2015-2.pdf>

These routes are therefore not considered by the Highway Authority to provide adequate links for all types of movements, for example disabled members of the public using wheelchairs, and commuters during the darker winter months. The Highway Authority would consider the provision of new footway links to Sheldon Road / Worminghall Road / Bridge Road, bypassing or improving the areas where footway links are insufficient, to be beneficial to the sustainability of the parish and to highway safety. Below are comments on proposed sites for development in Ickford.

#### Site 1 – Land at Turnfields

The closest bus stops are situated to the East, approximately 160m from the site and there is an existing footway leading from the proposed development site to the bus stops to ensure safe pedestrian access. The development would be required to provide a financial contribution towards public transport improvements.

There is sufficient land within the control of the landowner and the Highway Authority to provide the requisite visibility splays for vehicle speeds of 30mph.

#### Site 2 – Land at 42 Worminghall Road

This site access is approximately 100m from the nearest bus stop on Worminghall Road which would be considered a walkable distance. This is benefitted by a new proposed footway linking the site to the existing footway on Worminghall Road.

It should be noted that the new access is proposed off of the east of Worminghall Road. There is sufficient land within the control of the landowner and the Highway Authority to provide the requisite visibility splays for vehicle speeds of 30mph.

#### Policy NE1: Landscape, Views and Dark Skies

BCC is supportive of Policy NE1, specifically; *Development proposals shall include provisions for conserving dark skies, which is a highly valued feature of the village. All new lighting proposed as part of new development shall not exceed the standards for Environmental Zone 2 set in the Institute of Lighting Professionals Guidance Note 2011. Proposals for street lighting should be avoided unless required by the Local Highway Authority where the need can be justified.*

BCC is supportive of this policy and all new street lighting which is developed must fall into accordance with the standards for Environmental Zone 2 set by the Institute of Lighting Professionals Guidance Note 2011. However, street lights will be required in Ickford to provide adequate links for all movements, for instance commuters walking home in darker months.

#### Policy ND1: Settlement Boundary

BCC is supportive of Policy ND1, specifically; *Within the Settlement Boundary, proposals for new development will be supported which are appropriate in scale, design and character to the village; contribute to its local distinctiveness; and do not cause unacceptable harm to the amenity or living conditions of neighbouring occupiers.*

BCC will not support: *Proposals for development outside the Settlement Boundary in the open countryside will not be supported unless they;*

- *respect the character of the countryside and do not generate levels and types of traffic which would be harmful to highway capacity and / or safety*

Proposals to build more community facilities in Ickford will be supported by BCC as they will reduce the use of the private car. Providing these facilities will reduce pollution levels as pedestrians will have the option to walk to their local amenities. This would subsequently reduce traffic levels which would be harmful to highway safety.

BCC also supports the NPPF which sets out the parameters for development in open countryside.

### Policy ND3: New Housing Development

BCC is supportive of Policy ND3, specifically; *All new housing development will be required to deliver a well-designed scheme that links both visually and functionally to the existing village. The following issues must be addressed:*

- *Parking: All car parking spaces to be provided within individual curtilages, and to the rear of frontages. Where possible car ports should be provided rather than garages.*

Proposals to build new housing developments must fall in line with the standards set by the Local Planning Authority. Any car ports developed must be a sufficient distance from the highway as determined by the Local Planning Authority. Each new parking space must be 2.4m x 4.8m wide. The benefit of this is that parking for the new developments will not overspill onto the road creating a highways safety concern.

### Policy TT1: Traffic and Transport

BCC is supportive of Policy TT1, specifically: *New development in the parish will only be supported where it can be demonstrated that any severe adverse residual cumulative impacts on the road network would be mitigated and highway safety would not be compromised. Traffic calming infrastructure and new pavements (linking with existing pavements) will be required as part of any new development where required. All development should provide adequate off-street car parking. Until the emerging Plan and Design SPD is adopted, there should be 1 parking space within the plot for 1 bedroom homes, at least 2 spaces for 2 or 3 bedroom homes, and at least 3 spaces for 4 bedroom homes. These spaces do not include small garages or tandem parking. Any car parking spaces and footpaths, where required, should use permeable surfaces to allow for rainwater absorption and to maintain a rural character to the street scene.*

Buckinghamshire County Council has recently adopted the Highways Development Management Guidance policy document to help developers create great places, thriving communities and to set out many of the principles and standards that the Highway Authority applies when assessing new developments. It is advised that any site that reaches application stage reviews and takes into account these standards when designing the sites. The document is available at<sup>3</sup>

## **Ecology**

### Paragraph 6.2

This paragraph could be strengthened by inclusion of the following or similar: Hedgerows are Priority Habitats and often provide important ecological connectivity across the landscape. Hedgerows should be retained wherever possible.

### Paragraph 6.16

<sup>3</sup> <https://www.buckscc.gov.uk/services/transport-and-roads/transport-plans-and-policies/highways-development-management-guidance/>

Relates to dark skies and refers to guidance published by the Institute of Lighting Professionals. This section could also include reference to the 'Institute of Lighting Professionals and Bat Conservation Trust (2018) Guidance Note 8/18: Bats and artificial lighting in the UK'.

#### Paragraph 6.20

Makes reference to the Buckinghamshire and Milton Keynes Environmental Records Centre as BMKERC which is incorrect, the correct acronym is BMERC.

#### Policy NE2 Green Infrastructure and Biodiversity

Should be preceded (introduced) by the following or similar so that it is given context, as other policies in the Plan have: The following policy supports the approach to protecting biodiversity assets as set out in Chapter 15 of the NPPF (conserving and enhancing the natural environment). It should also make reference to policies in the VALP which refer to biodiversity and green infrastructure. Policy NE2 Refers to net gain in biodiversity which is supported. It is recommended that this policy also includes reference to the mitigation hierarchy and ecological information required to support a planning application. The following or similar should therefore be included:

- Planning applications should be supported by ecological assessment that is proportionate to the development and provides adequate details for decision makers.
- The mitigation hierarchy, to first avoid impacts, then to mitigate unavoidable impacts, and as a last resort to compensate for unavoidable residual impacts, should underpin all decisions made by professionals working within the planning and development sectors.

#### Strategic Flood Management

##### Policy F1: Flooding

This policy is consistent with national and local policy and the National Planning Policy Framework (NPPF). It would be useful to show the surface water mapping in addition to the fluvial flood mapping which is available on line<sup>4</sup>

##### Policy ND3: New housing development

*Sustainable Urban Drainage (SuDs) features should be designed to look as natural as possible and be wildlife friendly. Legal agreements dealing with issues of flooding to lower level gardens will be required.* It is not clear what this relates to nor how this could be delivered.

#### Paragraph 6.10

The village itself only partially lies in the floodplain.

#### Flooding and Drainage

This chapter needs to make a distinction between fluvial, surface water, groundwater and sewer flooding as the distinctions in the plan are not clear. It is not clear as to whether the sewer flooding is as a result of groundwater infiltration or inundation from surface water runoff from roads and hard surfaces. Detailed comments of sections of this chapter are below.

<sup>4</sup><https://flood-warning-information.service.gov.uk/long-term-flood-risk/map?easting=496443&northing=192151&address=100080505662>

#### Paragraph 8.1

- The statement that Flood zone 3 arises from overgrown rivers, excess groundwater and inadequate drainage is not correct.
- The floodplain (Flood zone 3) is a natural river and catchment feature.
- The river naturally flows onto the floodplain following times of heavy rainfall and not caused as a result of mismanagement.
- Excess groundwater is a natural phenomenon within a catchment of this type and soil type.
- New developments under National Planning Policy Framework are designed to ensure that greenfield runoff (the existing situation) is maintained so the new developments should not make things worse.

#### Paragraph 8.2

The terminology needs some revision as it is the flow routes not the hydrology which flow southwards into the River Thames.

#### Paragraph 8.4

This section would benefit from an explanation of the roles and responsibilities of the different authorities: Environment Agency; Lead Local Flood Authority; Local Planning Authority and Water Companies

#### Paragraph 8.5

Reference to the Vale of Aylesbury Local Plan (VALP) policies would be useful here.

Thank you again for consulting BCC on the Ickford Neighbourhood Development Plan Regulation 16 Consultation. We look forward to future engagement with you on the development of the Neighbourhood Plan. If you have any further queries on our comments, please contact the BCC Strategic Planning team via the following email address: [strat\\_planning@buckscc.gov.uk](mailto:strat_planning@buckscc.gov.uk)

Yours Sincerely

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