

Response to Inspectors Q67

I would welcome the Council's observations on the representations objecting to the allocation of additional sites in Buckingham (BUC 043 and 046); 1160 R Wilkins, 1139 Kim Hadden, 1531 Alastair Bird of Barton Willmore on behalf of Catesby Estates, 1279 (name censored), 2492, 2493 and 1267 Mrs L Bartlett, 203 Jeremy Bloss, 239 Katrina Standing, 254 Edward Green, 317 and 314 Cllr Warren Whyte, 600 and 603 Carolyn Cumming of the Buckingham Society, 886 and 2625 Christopher Wayman of Buckingham Town Council, 1167 and 2567 Mareen Growly, 1265 Mrs K Phipps, 2033 and 2035 Jon Gateley of Savills on behalf of Crest Strategic Projects, 2635 and 2636 Cllr Robin Stutchbury, 494 Mrs Wendy Cissell.

Representation 1160 R Wilkins

I am writing to express my opposition to the VALP allocation of both the additional sites in Buckingham which were not in our Neighbourhood Plan.

Under the national planning policy rules, I understand that the Council is supposed to respect Neighbourhood Plans, as they have been agreed locally by residents. As it has not done so, I would question whether the VALP has been properly prepared.

In addition, I note that the site close to Milton Keynes known as Shenley Park was recently taken out of the VALP. Given that this could deliver 2000 homes without placing undue pressure on Buckingham, I do not see how Aylesbury Vale can justify the decision to remove it whilst leaving us with two unwanted developments.

AVDC Response to 1160:

Due to the much higher housing need figures underpinning then VALP compared to the figures on housing need which applied when the the Buckingham Neighbourhood Plan was produced (those figures pre-date the Buckinghamshire HEDNA – CD-HOU004), the VALP needs to address this by considering further strategic allocations beyond those identified in the Neighbourhood Plan. The VALP also needs to allocate specific sites to be deliverable and achieve a 5-year housing land supply on adoption.

The VALP preparation has in the HELAA process considered the site assessment evidence and allocations in the submitted, examined and made neighbourhood plans, but it does have the final say on which allocations have been selected, based on the evidence for the VALP.

Neighbourhood Plans are subsidiary to local plans (i.e. those prepared by a District Council) which have the responsibility of meeting strategic housing requirements for the local area as a whole (based on housing need evidence for a Housing Market Area, in our case, Buckinghamshire).

Buckingham is also a strategic settlement (assessed in the Settlement

Hierarchy Assessment, September 2017 CD-MIS003) which is a suitable and sustainable location for further development.

Shenley Park (site WHA001) was an extension of Milton Keynes to the west included as part of the VALP Draft Plan which took forward a strategic option to focus some growth to the west of Milton Keynes and Bletchley. However with the reduced housing numbers in the VALP Proposed Submission compared to its previous stage the Draft Plan, only one site was needed in that area to meet the district wide growth requirements, and this need to be met by NLV001 which is already a commitment). Site WHA001, however, is not adjacent to one of Aylesbury Vale's Strategic Settlements and also had high landscape and visual impacts and potential coalescence issues with Whaddon unless an effective landscape buffer was provided. Site NLV001 (east of Whaddon Road) does not have as significant landscape/visual impact constraints, would not result in coalescence with Newton Longville and is adjacent to the edge of Bletchley.

Representation 1139 Kim Hadden

I am writing to object to the proposed development of sites BUC046 and BUC043 in the Local Plan. This flies in the face of our adopted neighbourhood plan and goes completely against what residents want. Considering that there is a site with capacity for 2000 homes a short drive away close to Milton Keynes, I believe Aylesbury Vale's decision to leave us with so much development in Buckingham is completely unjustified. Please think again before overloading our town with homes.

AVDC Response to 1139:

The VALP is a strategic plan for a whole district delivering housing needed for a housing market area to 2033. This district local plan is allowed to allocate growth beyond that identified in a made neighbourhood plan which was drawn up under a different growth requirement. Sites BUC043 and BUC046 and BUC051 are all suitable sustainable sites in AVDC's view and were assessed positively in the HELAA and the Sustainability Appraisal.

Representation 1531 Barton Willmore for Catesby Estates Limited

The emerging VALP includes sections on 'Strategic Settlements' - setting out allocations which will contribute towards meeting the District Council's housing requirement. In respect of Buckingham, the District Council proposes to allocate the following sites for residential development:

- Land west of AVDLP allocation BU1 Moreton Road, Buckingham (Site Reference: BUC043) – 130 dwellings
- West Buckingham, land bound by Brackley Road and the River Great Ouse (Site Reference: BUC051) – 300 dwellings
- Land off Osier Way (south of A421 and east of Gawcott Road) (Site Reference: BUC046) – 420 dwellings

In the first instance, it is noted that Site BUC043 was recently the subject of a dismissed planning appeal by the Secretary of State (Appeal Ref: APP/J0405/V/16/3151297) for the same quantum of development as proposed within the emerging VALP. Given the dismissal of the appeal, we have serious concerns with its suitability for allocation within the emerging VALP.

Furthermore, whilst Site BUC051 is safeguarded for development within the made BNDP, it is noted that significant areas of the proposed allocation are constrained by Flood Zone 2 and 3. In the absence of detailed evidence demonstrating that the allocation is deliverable, it is considered that priority should be given to sites falling within Flood Zone 1 – as required by paragraph 100 of the NPPF.

Therefore, given our concerns in respect of the draft allocations within the VALP, the Site is considered as a suitable and sustainable location to accommodate new development and should form an allocation for residential development – regardless of any increase to the District Council's OAHN. However, as set out above, it is considered that the Council's OAHN should be increased from 970 dpa to c. 1,300 dpa. Accordingly, the Site would also form a suitable allocation to accommodate any increase to the Council's OAHN.

Indeed, as part of the preparation of the VALP, the Site was taken into consideration within the supporting Housing and Economic Land Availability Assessment (HELAA) – an extract of which is provided at Appendix 6. As the extract shows, the Site was considered as part of a much wider landholding which included adjoining land to the north and east (Site Reference: MMO011). For ease of reference, it is noted that the HELAA provided the following comments in respect of Parcel MMO011:

“Unsuitable – The site is beyond a strong defensible town boundary that is well related to landform. The eastern part of the site is particularly sensitive to development and has a weak relationship to the existing settlement. There are long distance views to the south and development would also adversely affect the setting of the Maids Moreton church to the north.”

It is considered that removal of the eastern and northern parcels of land from the assessment, suitably resolves the concerns set out within the HELAA. The Site is considered to have a strong relationship with the existing built-form of Buckingham and development would not result in harm to Maids Moreton church – as confirmed by the Council's consultation response to the submitted outline application. Furthermore, the Site has been included within the site assessment section for Maids Moreton, rather than Buckingham. Given its location, we contend that the Site should be regarded as an extension to Buckingham.

As such, it is considered that the proposed allocations at Buckingham are not 'justified' as required by paragraph 182 of the NPPF as AVDC have not

suitably considered the reasonable alternatives. This assessment should include a review of the Site as an extension to Buckingham, rather than Maids Moreton. Furthermore, it is unclear as to how the strategy could be regarded as 'effective' given that an application for up to 130 dwellings at Site BUC043 has been dismissed by the Secretary of State. Moreover, insufficient supporting evidence has been provided to demonstrate that Site BUC051 is deliverable over the Plan period.

AVDC Response to 1531:

The Inspector of the appeal decision on the site BUC043 APP/J0405/V/16/3151297 concluded that there were no planning constraints against the principle of development on the site albeit the appeal was called in and the Secretary of State who disagreed with the Inspector's recommendation and has decided to refuse planning permission due to conflict with a made neighbourhood plan. Nevertheless, now the site is being allocated in the VALP which can allocate for strategic reasons beyond the Buckingham Neighbourhood Development Plan ("BNDP") settlement boundary. Settlement boundaries cannot after all remain permanent and are normally modified when new allocations are made.

Site Delivery Statements are in preparation with site promoters for BUC043 and BUC051. BUC051 has already been allocated as a reserve site in the made Neighbourhood Plan.

The representor promotes site MMO011 as an alternative. However, alternative sites do not need to be considered at this stage of the Examination. Nevertheless, as part of the preparation of the VALP, the site was taken into consideration within the supporting Housing and Economic Land Availability Assessment (HELAA) –

"Unsuitable – The site is beyond a strong defensible town boundary that is well related to landform. The eastern part of the site is particularly sensitive to development and has a weak relationship to the existing settlement. There are long distance views to the south and development would also adversely affect the setting of the Maids Moreton church to the north."

Site MMO011 has been subject of an appeal decision for up to 170 homes APP/J0405/W/17/3175193. The decision of 19 February 2018 was made since the VALP Proposed Submission consultation was completed. The appeal decision identifies significantly harmful landscape visual impacts and harm to settlement character (see paragraphs 17 and 18 of the appeal decision). On this basis and from the site assessment in the HELAA (which had already considered if part of the site might be acceptable and it wasn't) the site should not be allocated in the VALP.

The appeal decision has considered the site without the eastern and northern parcels of land and still concluded the site has significant harmful landscape, visual impacts and harm to settlement character. Also the HELAA study informing the VALP considered if any of the wider promoted site could be part suitable (for example just consider the extent of the appeal site) and the conclusion was still there were a number of significantly harmful impacts from any development on any part of the site.

Representation - 1279

As a resident of Buckingham, I would like to express my opposition to the VALP in its current form as it attempts to over-ride our Neighbourhood Plan by allocating two additional sites in the town which have not been agreed by residents. A great deal of time, effort and money went into the creation of our Neighbourhood Plan, which under national planning policy is supposed to be respected by local authorities when making decisions on development.

The two additional developments will create a surge of development in Buckingham when existing planning permission and allocation are taken into account. Aside from being unfair on residents, I do not believe there is a proper infrastructure plan in place to accommodate such growth.

I believe local residents would be better served if the Council were to respect our adopted Neighbourhood Plan and consider re-allocating the site close to Milton Keynes for 2000 homes, instead of burdening us with all this development.

AVDC Response to 1279 (name censored):

Shenley Park (site WHA001) was an extension of Milton Keynes to the west. However, with the reduced housing numbers in the VALP Proposed Submission compared to its previous stage the Draft Plan only one site is needed in that area. That need is met by NLV001 which is already a commitment).

The VALP is a strategic plan for a whole district delivering housing needed for a housing market area to 2033 which goes beyond the housing requirements which informed the neighbourhood plan. This district local plan is allowed to allocate growth beyond that identified in a made neighbourhood plan which was drawn up under a different growth requirement. Sites BUC043, BUC046 and BUC051 are all suitable sustainable sites in AVDC's view that were assessed positively in the HELAA and the Sustainability Appraisal. BUC051 is also already allocated in the made neighbourhood plan as a reserve site.

The VALP is accompanied by a submitted comprehensive Infrastructure Delivery Plan (CD-INF001) setting out where developer contributions would be needed to secure strategic infrastructure. Any applications will have to

have regard to the requirements of the Infrastructure Plan. There may also be further additions to infrastructure items at the planning application stage and the IDP itself is a living document and will be kept up to date.

Representations - 2492, 2493, 1267

I understand that the Council is consulting on the VALP before it is submitted, and would like to register an objection to allocations BUC043 and BUC046 in Buckingham.

As we already have a Neighbourhood Plan in place, Buckingham has planned its development in agreement with residents and was set to build 600 houses over the next 5-7 years. These additional sites will tip the balance towards overdevelopments, and I am concerned that the necessary infrastructure will not be in place in time.

I am also alarmed to hear that the Council decided to remove a large site near Milton Keynes from the VALP, while keeping our two allocations in. Most local people commute in that direction anyway, so I believe it would make far more sense to have that development instead of these unwanted ones.

AVDC Response to 2492, 2493, 1267:

Shenley Park (site WHA001) was an extension of Milton Keynes to the west however with the reduced housing numbers in the VALP Proposed Submission compared to its previous stage the Draft Plan only one site is needed in that area (NLV001 which is already a commitment).

The VALP is a strategic plan for a whole district delivering housing needed for a housing market area to 2033. This district local plan is allowed to allocate growth beyond that identified in a made neighbourhood plan which was drawn up under a different growth requirement. Sites BUC043 and BUC046 and BUC051 are all suitable sustainable sites in AVDC's view assessed positively in the HELAA and the Sustainability Appraisal. BUC051 is already allocated in the made neighbourhood plan as a reserve site.

The VALP has a time horizon to 2033 and has to show deliverability through site allocations to meet the needs over that full period, not just the 5-7 years referred to.

Representation – 203 Jeremy Bloss

The VALP has allocated 170 houses to Maids Moreton and then this proposed 130 houses in Buckingham which is also very close to Maids Moreton. It does not take into account the cumulative impact of the traffic on the local infrastructure. The nearest route for this traffic to the main A422 and A421 will be through Main Street in Maids Moreton exacerbating an already existing rat-run situation. This road is narrow, has lots of parked cars and no footpath in sections. It is already congested at times and faces another c.500 cars in close proximity.

AVDC Response to 203:

It has been found through considering the planning application 16/00151/AOP that the constraint of highways access and impacts cannot be tackled by mitigation and detailed design. Therefore, the site in Maids Moreton is no longer considered suitable and should be deleted from the VALP.

Representation - 239 Katrina Standing

I strongly object to more houses being built in the Maids Morton area. You've already ruined Buckingham town please stop ruining our village. Our school services and especially doctors are already stretched beyond their limits. The traffic through and around the town is awful and very dangerous. Crime has risen through the roof. Enough is enough!!

Representation - 254 Edward Green

Regarding BUC043 my Wife and I object to the new development. The roads and infrastructure are far too busy already. These houses will ruin the village feel and there are no local jobs for these people as the small town rates are so high all we have is charity shops and betting shops now. It will take up rural farmland land and damage the visual aspect of the village. A more natural place would be to develop along the M1 corridor. Has been a huge increase in properties in this area of late and this new development will destroy *(NB by AVDC - the representation ends like this)*

Representation - 317

Regarding site BUC043, given the previous rejection of this site by AVDC and by appeal, it is non-sensical to now include it.

AVDC Response to 239, 254 and 317:

The Inspector of the appeal decision on the site BUC043 APP/J0405/V/16/3151297 concluded that there were no planning constraints against the principle of development on the site albeit the appeal was called in and the Secretary of State disagreed with the Inspector's recommendation and has decided to refuse planning permission due to conflict with a made neighbourhood plan. Nevertheless, the position is now different because the site is being allocated in the VALP which can allocate for strategic reasons beyond the BNDP settlement boundary.

Representation - 314 Cllr Warren Whyte

Regarding site BUC046, this is a very large site that does not form part of the contiguous settlement area. It would restrict future growth of the adjoining employment area and it would encroach significantly into open countryside. If the site was to be approved, the site criteria is in need of amendment.

AVDC Response to 314:

The site has been assessed in the HELAA and the Sustainability Appraisal and scored positively. Site Q to come forward in the made neighbourhood plan already allocates 10 hectares of land nearby for employment needs. The site is considered to be accessible to the town and constraints on the site (such as the presence of a watercourse with higher flood risk and also high ecological value can be mitigated by requiring a buffer to built development. As long as a landscape mitigation scheme is approved and informed by a Landscape Visual Impact Assessment, AVDC is confident the landscape mitigation and detailed design can ensure any impact on the wider countryside is acceptable.

Representation – 600 Carolyn Cumming of the Buckingham Society

Site BUC0043 should be rejected under:

1. Policy S3
2. Not included in the BNDP
3. Outside the settlement boundary
4. Moreton Road is already acknowledged as being at capacity. There are no sustainable alternatives to surrounding, congested access roads.
5. There have already been severe problems relating to sewage disposal caused by Phases 1 and 2 of the Maids Moreton Road developments. Further development on this site would be of great detriment to residents of nearby estates.

AVDC Response to 600:

The Inspector of the appeal decision on the site BUC043 APP/J0405/V/16/3151297 concluded that there were no planning constraints against the principle of development on the site albeit the appeal was called in and the Secretary of State disagreed with the Inspector's recommendation and has decided to refuse planning permission due to conflict with a made neighbourhood plan. Nevertheless now the site is being allocated in the VALP which can allocate for strategic reasons beyond the BNDP settlement boundary.

The highways impacts of the site have been assessed in the VALP Transport evidence and also the appeal.

The site has been assessed for impacts in the AVDC Water Cycle Study and infrastructure impacts will be required to accommodate this growth and other sites in the town. However the VALP Submitted Infrastructure Delivery Plan sets out how these can be achieved.

Representation 603 Carolyn Cumming of the Buckingham Society

The proposal for development of site BUC046 is outside of the Buckingham

Neighbourhood Development Plan and the evidence base has not, therefore, been fully investigated. As it stands, it is extremely vague. There is no mention of additional educational or community facilities, which would be required on an allocation of 420 houses. If the development was found to be sustainable, much more consideration has to be given to the infrastructure details; e.g. employment provision given its proximity to a key employment site and to compensate for the loss of employment land on the Tingewick Road.

AVDC Response to 600/603:

Infrastructure requirements are set out in the Site Delivery Statement in the progress of being agreed with the site promoter and contributions are set out for all VALP sites in Buckingham in the Infrastructure Delivery Plan. The IDP also identifies what the town-wide infrastructure needs are.

The neighbourhood plan already allocates Site Q to the south of Buckingham Industrial Estate for ten hectares of employment development and the neighbourhood plan was made with the Tingewick Road site allocated for housing.. The VALP has assessed employment land needs of 27ha to 2033 and has already identified sites to meet those needs.

Representation - 886 Christopher Wayman of Buckingham Town Council

This site (BUC043) has been contentious. It was subject to a planning inquiry and was called in by the Secretary of State. The planning inspector's decision was overturned by the Secretary of State.

It is understood that VALP will become the most up-to-date part of the Development Plan when adopted, and thus will take precedence over the BNDP, and that AVDC is required to provide for housing need, and has allocated sites to fulfill this.

This however, does not explain the decision to include such a contentious site, which was called in by the Secretary of State partly on the basis that it was in breach of the BNDP. AVDC refused permission for the site, and joined with BTC at the planning inquiry in support of refusing planning permission. Why then is it included, when it is clearly known that the people of Buckingham have firmly rejected this site. It does not seem to consider the relevant consideration of co-operation between councils in the development of NDPs.

The selection of this site is unsound in that it contradicts AVDC's policy as stated in S3 of VALP:

"The scale and distribution of development should accord with the settlement hierarchy set out in Table 2 and the site allocation policies that arise from it. Other than for specific proposals and land allocations in the Plan, new development in the countryside should be avoided, especially where it would:

- a. Compromise the character of the countryside between settlements, and
- b. result in negative impact on the identities of neighbouring settlements or communities leading to their coalescence.

In considering applications for building in the countryside the Council will have regard to maintaining the individual identity of villages and avoiding extensions to built-up areas that might lead to coalescence between settlements."

It may be that AVDC has tried to reserve its position by stating that any allocated site in the Plan [see emphasized text above] is exempt from this strategic policy, but BTC queries whether it is sound to breach a stated strategic policy which will govern development, without providing strong cogent reasoning for so doing, whilst at the same time ignoring the BNDP.

Buckingham is a "strategic settlement" and Maids Moreton is a "medium village" [Table 2 of VALP].

Medium Villages have "some provision key services and facilities, making them moderately sustainable locations for development. The plan allocates some sites at medium villages." Maids Moreton has a small village hall and a pub. Site allocations for Medium Villages range from 6 to 171 within Table 2. Maids Moreton has 171 allocated. In addition, another 180 dwellings are allocated in site BUC 043, which lies on the boundary of Maids Moreton and Buckingham. In this allocation it would appear that AVDC is making coalescence de facto and going against its stated aim in S3 to avoid the loss of identity of settlements.

Acknowledgement of this would mean that the village of Maids Moreton should have questions of infrastructure addressed, as it will have questions of road access not just from their own development but also from the site BUC 043 as traffic seeks to avoid congestion in Buckingham town centre.

It should also be considered in terms of impact on Buckingham. The BNDP was not prepared with such complete coalescence as is evidenced by the Town Council's objection to planning permission being granted to the site on BUC 043. Much convenience shopping [Tesco; Aldi & the planned Lidl], as well as potentially the new combined health centre lie south of the by-pass. Many residents will be tempted into cars for journeys through Buckingham to reach these sites. At present the A413 will be the main route as the only alternative in Mill Lane to access A422 and the by-pass. This can only add to the congestion in the town centre, especially at the Old Gaol junction. The town centre congestion is noted in the BTS.

It will mean that opportunistic developers will be able to argue that as coalescence has been de facto achieved by AVDC's own Local Plan, then future development is exempt from S3.

It should be noted that it is "Part suitable" under HELAA as northwest corner to be

reserved for sports pitches and open recreation ground. The build line may be held level but the introduction of the site opens up further development - as is noted in the HELAA as regards BUC007 [land behind Gilbert Scott Drive] which is not deemed suitable until BUC043 is built out [on basis of previous AVDLP allocation].

If the current proposal to relocate all GP surgeries to Lace Hill to the south, then this site will not be within 800m, if it is now, which is debatable - it will not be possible to walk for many people; in addition three major convenience shops - Lidl, Aldi and Tesco will all be located south of the by-pass, encouraging residents to use car to access out of town shopping, and not supporting Town Centre First policy stated in E5

AVDC Response to 886:

The Inspector of the appeal decision on the site BUC043 (appeal ref APP/J0405/V/16/3151297) concluded that there were no planning constraints against the principle of development on the site albeit the appeal was called in and the Secretary of State disagreed with the Inspector's recommendation and has decided to refuse planning permission due to conflict with a made neighbourhood plan. Nevertheless, the position is now different because the site is being allocated in the VALP which can allocate for strategic reasons beyond the BNDP settlement boundary.

The VALP transport evidence (Buckinghamshire Local Plan Transport Modelling, 2017 CD-TRA002) and Buckingham Transport Strategy, 2017 (CD-TRA005) have considered the highways impacts from the growth at Buckingham including congestion in the town centre and a number of infrastructure upgrades are identified in the BTS which have been included in the Infrastructure Delivery Plan (CD-INF001). On the basis of this evidence and the infrastructure upgrade requirements through developer contributions, the impacts are considered acceptable.

AVDC has now proposed to delete the Maids Moreton allocation of around 170 homes (site MMO006) as an Proposed Examination Change and so any transport impacts on Maids Moreton and Buckingham would be less. There would and also less impact on the settlement identity of Maids Moreton.

On the issue of coalescence and identities of settlements (Buckingham and Maids Moreton), This issue has been investigated by AVDC as part of the issues on the planning appeal and the decision for APP/J0405/V/16/3151297, which concluded that there were no planning constraints against the principle of development on the site. Therefore in terms of this particular site there would be no conflict with VALP Policy S3.

In terms of HELAA site BUC007, this is different site further to the west and is not saying the site would be suitable if BUC043 is built out it is just saying it makes no sense to consider the site until such a time as site BUC043 were to be built out. The

conclusion is that the site is unsuitable and that would have to be revisited in a future HELAA new assessment to inform the next local plan. The site may also be considered in the review of the Buckingham Neighbourhood Plan.

AVDC Response to 886 on relocation of GP surgeries

The VALP Infrastructure Delivery Plan sets out the infrastructure requirements but is not so specific as to say where the new infrastructure off site has to be located. That would be determined at the planning application stage. There has also been engagement with the site promoter in producing a Site Delivery Statement to support this site allocation, listing the various items of infrastructure that AVDC would require on or off site. The VALP itself does not propose GP Surgery relocation but the IDP does refer to contributions to health and other infrastructure in the town to boost capacity.

Representation - 26525 Buckingham Town Council (Mr Christopher Wayman)

BUC 046

This site was unpopular with Buckingham residents during consultation for BNDP due to the fact that Lace Hill was felt to be disconnected from the town; a further large residential development separated from the town centre and associated facilities and services would only add to sense of dislocation. This sense of dislocation resulted in the Settlement Boundary being drawn as it is in the BNDP.

The site is as stated above dislocated from the town centre. A busy by-pass has to be crossed. Then a further residential development traversed before the edge of the town is reached. It is unlikely that many will be tempted into the town. This in turn calls into question consideration of policy E5 [Development outside Town Centres] – this policy is in compliance with the NPPF “Town Centre First” approach, but the town centre of Buckingham will struggle if residential development is situated where safe, pleasant and reasonable walking/cycling routes to the centre cannot be provided. If residents are forced to resort to their cars [assuming they have access to private transport], the severe pressure on car parking [and the charges, which were noted as a weakness in The Retail Report]] may ensure that larger shopping areas such as Milton Keynes or Bicester are more attractive.

Currently there is no public transport service to this area. Undoubtedly one could be provided if there was viability – which would need to be assessed on the basis of the stated national guidelines of residential development being within the 400m threshold of a bus stop with at least a half-hourly peak hour service provision “in order to ensure public transport use is a realistic alternative to the car” [VALP paragraph 7.23]. This would be a matter for Buckingham Transport Strategy, but site allocation to the north, west and south of the town may not assist in the ability to deliver viable public transport under the Strategy.

Ageing population – VALP acknowledges the ageing population of the district [VALP

paragraphs 1.36- increasingly elderly population & 1.39 life expectancy of residents has been steadily increasing, and is longer than average for England]. This is also supported in the BNDP for Buckingham itself. It may be assumed that an ageing population may not be able to resort to private transport to reach amenities, this problem is likely to increase through the life of the Plan. Site allocation of major new development as dislocated as this, is not sound planning for the residents of the district and their future needs.

This site may well be within an area that the Cambridge/Oxford Expressway route may take; if this site is developed immediately it may reduce options under this national infrastructure project. If it is to be allocated then the phasing should at least be altered to reflect this, and development should not be allowed until the route is clarified at national level.

AVDC Response to 26525:

The VALP is a strategic plan for a whole district delivering housing needed for a housing market area to 2033. This district local plan is allowed to allocate growth beyond that identified in a made neighbourhood plan which was drawn up under a different growth requirement. The site is suitable sustainable sites in AVDC's view assessed positively in the HELAA and the Sustainability Appraisal. The site is already suitable to meet the needs in the VALP and Buckingham's contribution to those needs and should not wait for the Expressway or other decision in the future.

The NPPF "Town Centre First" approach is aimed at ensuring as far as possible that town centre uses locate in the town centre, The approach is not for determining the location of new housing.

The route of the Oxford-Cambridge Expressway is not determined yet and so cannot be protected. There is not even a decision on the corridor for a route.

The allocation BUC046 is just as well located for access to the town centre as recent development east of London Road and south of A421 (Lace Hill).

Representation - 1167 and 2567

I am writing to register my objection to the allocation of sites BUC046 and BUC043 in the Local Plan.

As I understand it the former was subject to a planning inquiry and previously

opposed by the district council, and the latter is simply too far away from the town centre to be sustainable in the long term. Considering that these sites were also rejected during the creation of our neighbourhood plan, I cannot see how their inclusion can be considered justified.

It would be far more sensible to allocate housing close to Milton Keynes, for example on the site to the south west which seems to have come out of this version of the plan. As it can accommodate 2000 houses, this would substantially reduce the burden on Buckingham residents and renew our confidence that the council respects our views.

I hope Aylesbury Vale Council will reconsider its decision on these sites before the plan is adopted.

Representation - 1265 Mrs K Phipps

Please accept this as a formal letter of objection to the allocation the two sites in Buckingham (BUC043 and BUC046) in the VALP.

We already spent a great deal of time on a Neighbourhood Plan to ensure that our development plans were appropriate, and now it feels like we are being ignored by the Council. Having done so, the Plan as it stands allocates far too much housing to Buckingham too early on. It is particularly concerning that this is not supported by a robust local infrastructure plan.

I believe it would make more sense to look again at sites close to Milton Keynes which can benefit from that area's existing infrastructure. This would also ensure that the Neighbourhood Plan was upheld as it is supposed to be under national policy.

AVDC Response to 1167, 2567 and 1265:

The VALP is a strategic plan for a whole district delivering housing needed for a housing market area to 2033. This district local plan is allowed to allocate growth beyond that identified in a made neighbourhood plan which was drawn up under a different growth requirement. Sites BUC043 and BUC046 are both suitable sustainable sites in AVDC's view assessed positively in the HELAA and the Sustainability Appraisal adjacent to a strategic settlement within Aylesbury Vale.

The Shenley Park (site WHA001) was an extension of Milton Keynes to the west however with the reduced housing numbers in the VALP Proposed Submission compared to its previous stage the Draft Plan only one site is needed in that area (NLV001 which is already a commitment). The site is also not adjacent to a strategic settlement within Aylesbury Vale

Representation - 2033 and 2035– Savills for Crest Strategic Projects

The NDPs for both Buckingham and Winslow encompass review/reserve measures and it is thus essential to allow effective community engagement and review to take place before site-specific allocations are made in either town; either as part of full NDP reviews or as part of the VALP early review. Taking the approach advocated by AVDC undermines Localism and the efforts that both neighbourhood plan areas have undertaken to put an adopted neighbourhood plan in place.

The overall level of development for Buckingham and Winslow included in the Submission Draft VALP is similar to that envisaged in the previous Regulation 18 version (2016), and as previously, CSP does not object to the principle of that magnitude of development in either town over the plan period, if appropriately planned and phased with supporting infrastructure, with Neighbourhood Plan reviews being the principal mechanism to achieve this. However, the previous draft of the VALP did not seek to allocate individual sites for development in the towns, or propose timescales that conflict with Neighbourhood Plans. This is an important distinction between the two versions of the plan; with the latter Submission Draft unnecessarily expanding its remit in this respect.

A more effective strategy, proposed by CSP, is to enable the Reserve Site policy within the existing Neighbourhood Development Plan for Buckingham (within Policy HP1) to be triggered, but not to specify additional housing sites at Buckingham until the NDP has had the opportunity to be formally reviewed, in light of increased housing requirements, and duly factoring infrastructure requirements into the equation. There would be sufficient time to undertake either process (or both) before existing commitments are built out, and this would contribute to housing supply later at an appropriate stage in the plan period.

The VALP proposes to formally allocate two additional sites at Buckingham, over and above the made Buckingham Neighbourhood Plan. As shown in AVDC's Housing Supply Soundness Document, the additional sites are envisaged by AVDC to come forward relatively early in the plan period, in parallel with existing NDP sites. CSP objects to this strategy for several related reasons:

- a. as set out in Technical Appendix 6, existing commitments (comprising permissions and existing NDP allocations) provide a pipeline of circa 600 dwellings at Buckingham which can be built out at sustainable rates over the next 5-7 years;
- b. the Buckingham Neighbourhood Development Plan has already made express provision for a Reserve Site ('Site M') for an additional 300 dwellings, to provide additional capacity if other sites are not delivered or 'if a future Local Plan stipulates the need for additional housing within the lifetime of this Plan'.
- c. with the delivery of VALP sites at the same time as existing commitments (which is AVDC's proposal), development rates would exceed 2.5 times the long-term

average. This an unprecedented 'surge' in development at the town;

d. this 'surge' is ineffective and undeliverable in market terms. As set out in Technical Appendix 5, evidence from Land Registry new build transactions suggests that market absorption in Buckingham peaked at around 140 sales per year in 2015, then plateaued. In comparison, the VALP as drafted would entail a peak of 385 dwellings being completed in 2022/23.

e. it is not supported by a sufficiently robust plan for local infrastructure. As identified in draft representations by Buckingham Town Council, there is a particular concern in respect of education, and also in respect of water sewerage capacity in particular.

f. conversely AVDC's proposed delivery timeframes would subsequently produce a 'slump' in development with no sites being developed during the final seven years of the plan period. This is an equally ineffective approach.

g. In addition, excessive development at Buckingham (with Maids Moreton) would exacerbate substantial out-commuting flows to Milton Keynes by car. As shown in Table 3.1 below, based on 2011 Census data¹¹, of commuting movements out of Buckingham by car or van, around 27% have Milton Keynes as the destination

BUC043 - In effect, the Secretary of State endorsed the view expressed by Buckingham Town Council that to allow development on this site, contrary to the recently made Neighbourhood Plan, would undermine public confidence in the Neighbourhood Planning process to such a significant extent that, in this instance, outweighs all other considerations. As a consequence, this policy should be omitted from this plan with the site being considered as part of a future review of the NDP.

BUC051 – CSP does not object to the site being allocated in the VALP but a more appropriate strategy than either of these alternatives (whichever is the Council's actual intention) would be to phase delivery from circa 2024/2025, after the existing commitments have come forward, and to build at an intermediate rate of around 50 per annum which reflects other sites in the town.

AVDC Response to 2033 and 2035:

The VALP is a strategic plan for a whole district delivering housing needed for a housing market area to 2033. This district local plan is allowed to allocate growth beyond that identified in a made neighbourhood plan which was drawn up under a different growth requirement. Sites BUC043 and BUC046 and BUC051 are all suitable sustainable sites in AVDC's view assessed positively in the HELAA and the Sustainability Appraisal. BUC051 is already allocated in the made neighbourhood plan as a reserve site.

The VALP has been drawn up considering the sites promoted through the 'Call For

Sites' process and also the Site Assessment evidence base of the Buckingham Neighbourhood Plan. Sites that had been submitted as planning applications were also considered in the HELAA capacity study. Therefore a thorough exercise has been carried out and the options in the HELAA version 3 and 4 have been tested through technical evidence prior to the final site options being chosen. The Neighbourhood Plan Reserve Site is one of the sites that has been chosen for development through the VALP.

The VALP is accompanied by a submitted comprehensive Infrastructure Delivery Plan (CD-INF001) setting out where developer contributions would be needed to strategic infrastructure. There may be further additions to infrastructure items at the planning application stage and the IDP itself is a living document and will be kept up to date.

The VALP housing delivery assumptions are estimations from engagement with site developers and AVDC's experience of delivery in the local area. AVDC does not have a justification for phasing sites to be delivered towards the end of the plan period if they can be brought forward earlier.

The VALP transport evidence (Buckinghamshire Local Plan Transport Modelling, 2017 CD-TRA002) and Buckingham Transport Strategy, 2017 (CD-TRA005) have considered the highways impacts from the growth at Buckingham including congestion in the town centre and a number of infrastructure upgrades are identified in the BTS which have been included in the Infrastructure Delivery Plan (CD-INF001). On the basis of this evidence and the infrastructure upgrade requirements through developer contributions, the impacts are considered acceptable.

AVDC has now proposed to delete the Maids Moreton allocation of around 170 homes (site MMO006) as an Proposed Examination Change and so any transport impacts on Maids Moreton and Buckingham would be less and also less impact on settlement identity of Maids Moreton.

The Inspector of the appeal decision on the site BUC043 APP/J0405/V/16/3151297 concluded that there were no planning constraints against the principle of development on the site albeit the appeal was called in and the Secretary of State disagreed with the Inspector's recommendation and has decided to refuse planning permission due to conflict with a made neighbourhood plan. Nevertheless now the site is being allocated in the VALP which can allocate for strategic reasons beyond the BNDP settlement boundary.

AVDC has been preparing a site delivery statement for all allocated sites including BUC051 and has agreed the delivery rates are realistic.

Representation - 2635 and 2636 – Cllr Robin Stuchbury

There is internal inconsistency within the VALP. The allocation of two of these sites is inconsistent with other strategic policies within VALP. It is submitted that the

inconsistency makes it unsound, as the lack of apparent consideration as to whether there are other suitable sites consistent with the Plan.

It is noted that the Water Cycle Survey notes that upgrading to sewerage will be required by the Anglian Water before any further major development is possible at Buckingham [Water Cycle Study Volume 2 at 5.4.6.2]. It is noted in the document that pertaining to Buckingham “Infrastructure and/or treatment upgrades will be required to serve proposed growth. Major constraints have been identified”[p.89]

If developer contributions to the sewerage upgrade are required to bring this development on sooner, then this will affect viability calculations and may reduce affordable housing and infrastructure. It should be noted that s.106 of Town and Country Planning Act prevents such infrastructure forming part of CIL or S. 106 agreements.

BUC043 - It is understood that VALP will become the most up-to-date part of the Development Plan when adopted, and thus will take precedence over the BNDP, and that AVDC is required to provide for housing need, and has allocated sites to fulfill this.

This however, does not explain the decision to include such a contentious site (BUC043) , which was called in by the Secretary of State partly on the basis that it was in breach of the BNDP. AVDC refused permission for the site, and joined with Buckingham Town Council at the planning inquiry in support of refusing planning permission. Why then is it included, when it is clearly known that the people of Buckingham have firmly rejected this site. It does not seem to consider the relevant consideration of co-operation between councils in the development of NDPs.

Allocated in site BUC 043, which lies on the boundary of Maids Moreton and Buckingham. In this allocation it would appear that AVDC is making coalescence de facto and going against its stated aim in S3 to avoid the loss of identity of settlements.

If the current proposal to relocate all GP surgeries to Lace Hill to the south, then this site will not be within 800m, if it is now, which is debatable – it will not be possible to walk for many people; in addition three major convenience shops – Lidl, Aldi and Tesco will all be located south of the by-pass, encouraging residents to use cars to access out of town shopping, and not supporting Town Centre First policy stated in E5.

BUC046.

This site was unpopular with Buckingham residents during consultation for BNDP due to the fact that Lace Hill was felt to be disconnected from the town; a further large residential development separated from the town centre and associated facilities and services would only add to sense of dislocation. This sense of dislocation resulted in the Settlement Boundary being drawn as it is in the BNDP.

The site is as stated above dislocated from the town centre. A busy by-pass has to be crossed. Then a further residential development traversed before the edge of the town is reached. It is unlikely that many will be tempted into the town. This in turn calls into question consideration of policy E5 [Development outside Town Centres] – this policy is in compliance with the NPPF “Town Centre First” approach, but the town centre of Buckingham will struggle if residential development is situated where safe, pleasant and reasonable walking/cycling routes to the centre cannot be provided. If residents are forced to resort to their cars [assuming they have access to private transport], the severe pressure on car parking [and the charges, which were noted as a weakness in The Retail Report]] may ensure that larger shopping areas such as Milton Keynes or Bicester are more attractive.

Currently there is no public transport service to this area. Undoubtedly one could be provided if there was viability – which would need to be assessed on the basis of the stated national guidelines of residential development being within the 400m threshold of a bus stop with at least a half-hourly peak hour service provision “in order to ensure public transport use is a realistic alternative to the car” [VALP paragraph 7.23]. This would be a matter for Buckingham Transport Strategy, but site allocation to the north, west and south of the town may not assist in the ability to deliver viable public transport under the Strategy.

Ageing population – VALP acknowledges the ageing population of the district [VALP paragraphs 1.36- increasingly elderly population & 1.39 life expectancy of residents has been steadily increasing, and is longer than average for England]. This is also supported in the BNDP for Buckingham itself. It may be assumed that an ageing population may not be able to resort to private transport to reach amenities, this problem is likely to increase through the life of the Plan. Site allocation of major new development as dislocated as this, is not sound planning for the residents of the district and their future needs.

This site may well be within an area that the Cambridge/Oxford Expressway route may take; if this site is developed immediately it may reduce options under this national infrastructure project. If it is to be allocated then the phasing should at least be altered to reflect this, and development should not be allowed until the route is clarified at national level.

AVDC Response on 2635 and 2636

Viability and Water Cycle Study

Viability evidence for the VALP has considered the allocated sites and the infrastructure burdens and concluded that viability would not hinder the site coming forward. There will need to be further engagement with Anglian Water by the developer to see when the Water Cycle infrastructure could be put in place within a 5

year Asset Management Plan of the Water Company, The upgrades required may affect the phasing of development and so this issue would need to be investigated to address the VALP Policy I5 (Water Resources).

BUC043:

On the Called in planning application on BUC043 , the Secretary of State disagreed with the Inspector that planning permission should be granted. Therefore the infrastructure requirements have to be identified in the VALP and they are – in the Site Delivery Statement in preparation and in the Infrastructure Delivery Plan. The VALP will inform any future planning application but the VALP itself doesn't propose GP Surgery relocation, the VALP Infrastructure Delivery Plan does refer to contributions to health and other infrastructure in the town to boost capacity.

BUC046:

The site has been assessed in the HELAA and the Sustainability Appraisal and scored positively. The site has been considered in the transport evidence for the VALP and the impacts are acceptable. The site is considered to be accessible to the town and constraints on the site can be mitigated. The Infrastructure Delivery Plan identifies where contributions will be needed to town wide infrastructure related to development of the site and there is also a Site Delivery Statement in the process of being agreed with the site promoter identifying site and offsite infrastructure requirements. The site compared to alternatives is considered to be the best site in principle beyond those already committed.

Ageing Population

The location of sites at a distance from the town centre and other local facilities does not in itself mean housing for older people cannot be provided. Policy H6 (housing mix) would apply and the Policy sets out that larger residential schemes in strategic settlements will be expected to provide an element of self-contained extra care dwellings. The final sentence of the policy sets out that all new residential development should meet accessible and adaptable dwelling standards. The VALP Infrastructure Delivery Plan sets out infrastructure enhancements required to support the VALP growth.

Oxford-Cambridge Expressway

VALP para 3.77 sets out the circumstances that would trigger a review of the VALP, including the Oxford-Cambridge Expressway. However even if a decision on the corridor is announced before the VALP sites at Buckingham come forward as planning applications, the detailed route of the Expressway will still be some time in the more distant future.

Representation - 494 Mrs Wendy Cissell

BUC046. This will ruin the street scene of the area and take away valuable farm land and wildlife. This proposal will also create increased traffic on already overloaded A roads i.e. A421 and A422 which are already struggling to cope with the M40 to M1 traffic. It would ruin the market town which cannot cope with the population already in place. Not enough schools/ GP's in the town as it is now- I object strongly.

AVDC Response:

The site has been assessed in the HELAA and the Sustainability Appraisal and scored positively. The site has been considered in the transport evidence (Countywide Transport Modelling and Buckingham Transport Strategy) for the VALP and the impacts are acceptable. The site is considered to be accessible to the town and constraints on the site can be mitigated. The Infrastructure Delivery Plan identifies where contributions will be needed to town wide infrastructure related to development of the site and there is also a Site Delivery Statement in the process of being agreed with the site promoter identifying site and offsite infrastructure requirements. The site compared to alternatives is considered to be the best site in principle beyond those already committed.

The constraint of Agricultural Land Quality has been assessed in the HELAA as has the presence of biodiversity assets. Any impacts have been noted and where there are adverse impacts, site investigations and mitigation have been required in allocating the sites.