

Buckingham Town Council – Response to VALP

13 December 2017

Summary:

Buckingham Town Council submits that the Plan is not sound in parts due to lack of deliverability/ effectiveness on the following points:

inconsistency of approach to Neighbourhood Development Plans touching on national policy;

H1 25% affordable housing – too low on available evidence;

deliverability of additional site allocations in Buckingham, especially phasing in light of Water Cycle Study evidence;

deliverability of employment provisions, especially transport links to Silverstone Park and lack of further provision at Buckingham;

education – failure to present strategic plans to deliver vision; transport – failure to provide protection for routes for Cambridge/Oxford Expressway.

(1) Introduction

The Town Council welcomes that with the advent of an up-to-date Local Plan as part of the overall Development Plan, opportunistic development which the Town Council has opposed will become less of a feature in the North of the District. The Town Council has invested considerable public money in the preparation and making of the Buckingham Neighbourhood Development Plan [October 2015] [BNDP] which together with VALP [when adopted] will form the Development Plan for Buckingham Neighbourhood Development Area in the immediate future. VALP also provides the up-to-date Local Plan from which any review of the Neighbourhood Plan can assess its compliance with the Strategic Plans as set out in VALP.

Buckingham Town Council does have the following observations as to soundness of the existing draft submission.

(2) Neighbourhood Development Plans

2.1 Buckingham Town Council acknowledges **S8** but notes that it pertains only to future NDPs being made after the adoption of the VALP. Given that it is acknowledged that there is a significant number of NDPs within the district, it was hoped that there would be more clarity as to the status of the components of the Development Plan overall after adoption of VALP.

Employment

2.1.1 It is acknowledged that **S1** does include site allocations within neighbourhood plans, in addition **E2** is now worded to include “appropriate” allocations within neighbourhood development plans and thus may in fact be seen to be within the Local Plan now.

- 2.1.2 Uncertainty may occur, however, when considering employment sites. The existing Buckingham Industrial Estate is specifically saved under **E1** of VALP and offered specific protection. However, **E2 Other Employment sites** will mean that the employment site allocations in BNDP are now governed by **E2** and not the BNDP, as this is the most recent part of the overall development plan, so the protection of an allocated site will depend on whether it is deemed “appropriate” and then whether the conditions in **E2** are operational.
- 2.1.3 It is submitted that in recognizing the success of the Buckingham Industrial Estate in **E1** and its importance for local employment, **E2** jeopardises the potential for future expansion to accommodate an increased population over the term of the Plan, as employment sites can be released after two years of marketing, if other conditions in **E2** are also met. **Reliance on Silverstone Park is misplaced and unsound due to the serious transport constraints noted below.**

2.2 Retail

- 2.2.1 Further confusion as to the position of NDPs is found when the retail section is considered in **E6** – here the definitions of primary and secondary frontages set out in BNDP are adopted, as well as the location boundaries. However, the BNDP policy EE4 is mentioned in the policy explanation [paragraph 6.22 footnote 30 of VALP] but is not saved within **E6**. The result being that whilst BNDP sets the location and definition of primary and secondary shop frontages, the policy applying to them is in fact **E6**.
- 2.2.2 The BNDP sought to address a very specific problem in Buckingham Town Centre of not having a wide enough offer to help the vitality of the town centre. This is specifically acknowledged within paragraph 4.185 of VALP
- “Buckingham town centre also needs to build on its programme of regeneration to maximise the benefits continuing growth can bring, and to support the level of jobs and homes growth proposed for the northern part of the district. Growth of the university campus is likely to play a role in this. Some of these issues are addressed in the made Buckingham Neighbourhood Development Plan. It sets out policies to revitalize and grow Buckingham town centre”*
- 2.2.3 This is echoed in the Supporting Evidence in the Retail Evidence section in Buckingham Town Centre Retail Appraisal, Health Check and Opportunities Assessment December 2016, The Retail Group which identifies “Over dominance of some types of operator; health and beauty salons / operators, estate agents and charity shops” and “non retail in high visibility locations”[paragraph 6.4 as two of the identified weaknesses]
- 2.2.4 There is a lack of clarity as to which policy and associated aims are being pursued; going to the effectiveness and again internal inconsistency thus soundness of the Plan.

2.3 BE 2 – Design

- 2.3.1 The intention is that there will be an SPD document produced under this policy. There is no mention either in the policy or the policy explanation that explains how such documents in existing NDPs are to be treated, or in those coming forward. Are they to be incorporated into the single document, which will contain a chapter specifically for that area within the District?
- 2.3.2 Design of development is one of the key pillars of NDPs – NPPF paragraph 185 “shape and direct sustainable development”. Paragraph 185 of the NPPF only assists where the provision is non-strategic and is not clear whether it includes Local Plans subsequent to the NDP.
- 2.3.3 There is internal inconsistency. In relation to **BE 2**, paragraph 8.42 states:
- “The key to the Council’s approach towards the design of new development is a focus on local distinctiveness. This refers to the unique quality of buildings, landscape and topography in a locality that defines its character. Within the district there is a wide variety of landscape character types... Designs or layouts that may be entirely acceptable in one part of the district may not be appropriate elsewhere.”*
- It is submitted that that summarises the role of NDPs in relation to design very well indeed, and thus it might have been expected as such that the role of NDPs might have been stated here.
- 2.3.4 Yet it is not.
- 2.3.5 So it is attempting to be a District-wide policy that differs according to the area of the district to which it pertains specifically in **BE2 (b)**. This requires clarity as to how existing and future NDPs co-exist here.
- 2.3.6 In general the principle is that where two elements of the Development Plan overlap then the most recent – here VALP – takes precedence. In not making clear provision for the status/protection of such design statements – and overriding such statements with a District wide document this policy is not in conformity with NPPF and thus goes to the soundness of this policy.

2.4 Non-engagement with Neighbourhood Planning

- 2.4.1 Overall Buckingham Town Council submits that there has been a lack of engagement with the existing NDPs as well as failure to acknowledge the emerging NDPs within the District or properly consider their role in providing sustainable development for the district. There is an inconsistency in the approach throughout VALP which almost guarantees developer challenges in the future – again slowing down deliverability.
- 2.4.2 Another clear example is the wording of paragraph 3.72:

“Made’ neighbourhood plans will not replace the Local Plan but will sit alongside it, with their non-strategic policies applying ahead of similar policies in the Local Plan, e.g. in relation to parking requirements...”

Again this seems (i) not to take account of existing Neighbourhood Plans; nor (ii) does it seem internally consistent within VALP as **T5** states that parking requirements will be set out in the SPD, but as seen above that **BE2** the policy relating to SPD makes no mention of how neighbourhood planning will fit in.

Paragraph 3.72 of policy explanation in VALP states:

3.72 ‘Made’ neighbourhood plans will not replace the Local Plan but will sit alongside it, with their policies applying ahead of similar policies in the Local Plan, e.g. in relation to parking requirements . The Council will work with local communities to deliver growth through neighbourhood plans and good communication between the Council and local communities will be essential.

This still leaves the question of what is “similar” and also the argument that a SPD under VALP is more up-to-date as part of the Development Plan than an existing document in a NDP.

- 2.4.3 The stated duty in statute and NPPF may be to assist with the production of NDPs; this lack of engagement and acknowledgement of other component parts of the Development Plan for the District goes to the effectiveness of VALP and therefore its soundness as well as not heeding central government policy towards neighbourhood planning. There should either be consistent saving of NDPs within VALP policies or the role of emerging NDPs; or the reasoning as to why they are excluded or modified should be found more consistently within VALP.
- 2.4.4 This should not just be for reasons stated in paragraph 3.73 and **S8** merely restates what is an existing legal and policy [NPPF] duty for plan-making.
- 2.4.5 The lack of consistent engagement with the national policy of Neighbourhood Planning demonstrated throughout VALP provides confusion as the overall Development Plan and thus renders it unsound on deliverability and national policy.

(3) Housing

3.1. The Town Council wishes to challenge **the soundness of H1** in its ability to meet the need for affordable housing in AVDC and in particular within the BNDP Area and the north of the district.

3.1.1 Current position

- 3.1.1.1 It is submitted that AVDC has not compiled an accurate assessment of the current position through apparently relying solely on the commissioned HEDNA and not also considering other evidence.

- 3.1.1.2 The BNDP sets out a requirement of 35% affordable housing for any development over 1 hectare or 25 dwellings or more. [Buckingham Neighbourhood Development Plan HP5, adopted 30th September 2015]. This was based on the high housing costs in Buckingham, linked to the high demand for accommodation from students at the independent University of Buckingham.[BNDP Evidence Base p. 9 https://www.aylesburyvaledc.gov.uk/sites/default/files/page_downloads/Appendix-1-Evidence-Base-Submission-March-2015.pdf supported by CIL Viability Report (September 2012, Dixon Searle); the AVDC HEGA (G.L. Hearn, 2011)]
- 3.1.1.3 At the same time as the Buckingham Plan was being prepared, 2014, AVDC had amended their requirement upwards to 30% in AVDC Affordable Housing Policy Interim Position Statement,(June, 2014) on a development of one hectare or 25 dwellings or more. AVDC did not object to the figure of 35% in the BNDP.
- 3.1.1.4 A year earlier, it had not objected to the figure of 35% in the Winslow Neighbourhood Development [Policy 4, WNDP adopted 10th September, 2014].
- 3.1.1.5 The same figure is to be found in the Great Horwood Neighbourhood Development Plan [Policy 1(ii), adopted 16th March, 2015].
- 3.1.1.6 Most recently the Steeple Claydon draft Neighbourhood Development Plan relies upon the then draft VALP figure of HP1 of 31%.
- 3.1.1.7 Of the policies adopted, none of the Independent Examiners thought these figures to be out of line, especially as each requirement was subject to a viability assessment.
- 3.1.1.8 While it may be understood that unmet need fluctuates within such a time frame, it would be expected that there might be some decrease in the need for affordable homes to justify adopting such a drop in requirement as is proposed in the new HP 1. This does not seem to be the case.
- 3.1.1.9 The submission version of VALP states at paragraph 1. 47 that the total number of households on the Bucks Home Choice Register was 3,000. This does not give the figure for AVDC but for the whole area covered by Bucks Home Choice.
- 3.1.1.10 In 1.48 of VALP the figure for annual building rate is 1,127 homes [presumably within AVDC area] of which 349 were affordable homes. This works out as 31% affordable housing of the yearly build, and yet there is still a significant unmet need [even if a crude three-way split were applied to the Bucks Home Choice figure] within the District.
- 3.1.1.11 Current figures as of 3rd October, 2017 as provided by AVDC on 10th November, 2017 are numbers on the Housing Register in Bands A-D are 2561 over the entire AVDC district, and 256 in the North sub-group. At least 10,244 houses would need to be built at 25% affordable rate to clear this backlog alone on an extremely simplistic basis. This would then leave the future housing need to be supplied from the remaining quota of homes. This assumes that all development will yield 25%.

- 3.1.1.12 Prior to the recent planning inquiry on the development at Moreton Road [and a site that is allocated in VALP as BUC043], the developers were prepared to offer 30% affordable housing on the site. This would suggest that in the north there is enough viability to accommodate a figure of more than 25%.
- 3.1.1.13 This alteration will have a significant impact on the BNDP area – with 617 homes with an affordable housing rate of 35% a maximum of 216 homes might have been achieved; with a rate of 25% then a maximum of 154 homes will be achieved equating to the loss of 62 homes.
- 3.1.1.14 When the VALP allocation of development is added of another 850 homes, with BNDP 35% rate that might have yielded a maximum of a further 298 affordable homes, but with VALP only 213 homes will be achieved – a loss of 85 homes – so the alteration of the figure means a potential loss of 147 affordable homes in the BNDP area alone. That would go some way to clearing the 256 outstanding in the North sub-district.

3.2 Delivery - the rate of delivery of houses is such that there is a current underperformance – reduced numbers of houses being delivered, means a reduced number of affordable houses being made available. Although the underperformance may be corrected and the supply levelled going forward with a period of delivery exceeding yearly target, this is not certain and reducing the percentage of affordable housing required is not a sound policy.

3.3 Consistency in the North of the District

- 3.3.1 It is noted above that the Neighbourhood Development Plans for the areas to the north of the district have all set a minimum figure of 30% for affordable housing [subject to viability].
- 3.3.2 In relation to Buckingham evidence shows that it is an area of high housing costs [Buckingham Neighbourhood Development Plan above]
- 3.3.3 It should not be assumed that those who are unable to access market housing to buy, will be able to access private rental market, especially in Buckingham. Buckingham has high rental rates. The market rate is high due to the number of students attending the independent University of Buckingham. Although the University plans to build more student accommodation, and there is provision in the BNDP to allow for new accommodation of up to 400 students, there is still considerable pressure on the private sector rental market, keeping costs high. It is submitted that the HEDNA did not take account of the differentials within the district and focused on its own “best fit area” to the south of the district and its neighbouring councils.

3.4 Neighbouring Districts to the North of the District

- 3.4.1 It is informative that neighbouring councils, particularly to the north of the district have higher affordable homes provisions.
- 3.4.2 South Oxfordshire District Council, South Oxfordshire Local Plan 2033 p.73 – sets a rate of 40%

http://www.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=776170511&CODE=D2E6F03567847CD279E120E088D3DB19

- 3.4.3 Cherwell District Council – Policy BSC 3 – Affordable Housing: Banbury & Bicester 30% and Kidlington and elsewhere 35% [2015]
- 3.4.4 Milton Keynes Council emerging Local Plan sets a rate of 33% aiming to achieve 30% overall.

Milton Keynes Council admits that it is facing a severe social housing shortage [taken to mean the definition of affordable homes followed in the evidence for VALP] which neighbours the north of the AVDC area. [MK Council website: <https://www.milton-keynes.gov.uk/housing/need-somewhere-to-live/who-can-we-help-with-housing> accessed 1st December 2017

- 3.4.5 These are all subject to viability and apply to 11 dwellings or more – the same as VALP.
- 3.4.6 It is also interesting that Oxford City Council is adopting the retention of its 50% affordable housing policy. This may be seen as informative as to viability but also it must be recognized that the City has constraints as to the number of houses that can be built and also the extraordinarily high residential prices. It is not completely irrelevant as the city faces the same pressure for student accommodation, and the premium of good local schools, both of which inflate house prices. Buckingham's market house prices- both in purchase and rental – are similarly affected
- 3.4.7 As it is assumed that some unmet affordable housing need from neighbouring southern districts will need to be accommodated [paragraph 5.4 of VALP], then what evidence is there to the contrary for the north?
- 3.4.8 Whilst the HEDNA identified the best fit housing area as including southern neighbouring councils and there is an administrative appeal to linking with other districts within the Buckinghamshire County Council area, this is by no means a definite position. The Government's own analysis in 2010 [Geography of Housing Market Areas] suggested that the northern part of the AVDC area had a best fit housing area more to the east. This is also the case in the National Infrastructure Commission's Interim Report on the Cambridge/Oxford Expressway Figure 9 which uses Savills Strategic Housing Market areas, which again shows the market as stretching to the east as opposed to the south.
- 3.4.9 If there is unmet affordable housing need in the southern neighbouring councils and the assumption is that some of that will need to be accommodated within the AVDC area, then it may also be suggested that the same is true in the more northerly councils. Using the Right Home in the Right Place document, it can be identified that there is a potential unmet housing need deficit of 1137 homes based on the area centred by AVDC and taking in surrounding districts based on the new government calculations. Under the table in that document, based on the new method of calculation and the evidence currently available, the

following districts will have an over provision; South Oxfordshire (108 min.); Cherwell District Council (380); Chiltern District Council (15 min); Dacorum District Council (154); the following councils will have underprovision AVDC (534); South Northants District Council (91); Milton Keynes Council (65); Wycombe (151); Central Bedfordshire (953). Given the emphasis placed by the Government in relation to provision of affordable homes, it submitted that it is not sound to reduce the percentage of affordable homes sought, on one methodology of calculating affordable home requirement alone. Especially as any figure is subject to negotiation and viability testing.

3.5 Viability

- 3.5.1 It may be thought that 25% as a figure is unlikely to prove unviable to potential developers and seeks to comply with NPPF paragraph 173. It is noted that in seeking planning permission for the 130 homes at Moreton Road, Bellway were able to offer 30% affordable housing without any question of viability. Again it is accepted that market conditions vary as well, but certainly in the north of the district such a figure does not seem to provoke much concern.
- 3.5.2 Such calculations are always open to viability arguments and open book calculations. It is always possible for a lower figure to be agreed; it is much less likely that an upper figure would be agreed.
- 3.5.3 It is submitted that AVDC has not considered all evidence, just the commissioned report and therefore the **H1** is unsound in that it will not be able to meet unmet need both existing and future for affordable housing. A higher figure would give greater flexibility in an uncertain economy as well as seeking to meet the current need asap.

3.6 Housing Mix

- 3.6.1 It must be remembered that AVDC in preparing this Plan are under a statutory duty under the Equality Act 2010 s. 1:
S. 1(1)An authority to which this section applies must, when making decisions of a strategic nature about how to exercise its functions, have due regard to the desirability of exercising them in a way that is designed to reduce the inequalities of outcome which result from socio-economic disadvantage.
- 3.6.2 In addition NPPF places a requirement to ensure a good mix of housing.
- 3.6.3 There is inconsistency in the policy explanation at 5.61 which refers to “larger developments” as being more than 300; yet in the actual policy **H6** larger development is taken to be 100 or more. As this will affect Buckingham as a strategic settlement, and that given the apparent inconsistency could mean a difference in the amount of extra care is provided, as all three sites would give rise to more than 100 dwellings.
- 3.6.4 Two of these sites may not be considered suitable for “extra-care” provision due to distance from facilities such as GP surgeries;

convenience retail and public transport. This does not seem to have been considered in the allocation/suitability of these sites.

- 3.6.5 There is a need to secure retention or replacement of small houses; there is no provision for collating figures on when a small dwelling is extended to an extent that it no longer serves the function of a small dwelling. If the lifetime house is encouraged, where the house can grow with families, then there needs to be a mechanism to ensure that the original small house is replaced within the area stock. This would enable future housing mix calculations to take such losses into account.
- 3.6.6 Childcare facilities – in order to prevent change of use applications seeking to take residential housing stock out of residential use and convert to childcare facilities in new housing, should provision not also be made to such facilities on larger developments. Siting them on employment land may be appropriate but many children attend nursery and childcare whether care-givers are working or not. Such facilities are subject to heavy requirements by Ofsted and are often better sited in purpose-built facilities. This is an additional example of where VALP has vision statements regarding education but does not indicate how it will be delivered.
- 3.6.7 The above points serve as corrections for clarity; or additional detail on the policy relating to housing mix which should be added to achieve deliverability.

3.7 Site allocations in Buckingham

- 3.7.1 It is understood that the site allocations in the BNDP are assumed but that in addition to the reserve site from that Plan, BUC051, further housing numbers are required, and the designation of Buckingham as a strategic settlement has driven these additional site allocations.
- 3.7.2 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.
- 3.7.3 In addition 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].
- 3.7.4 The overall RAG score for Buckingham sites was Amber – broken down into 1-5 years and 6-15 years the sewerage System Capacity - WwTw Capacity – Red; Sewerage Network capacity – Amber; Surface water Network Capacity Red
- 3.7.5 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] There is only one other red area across the area and that is Stanbridgeford.

3.7.6 This might question why Buckingham is allocated such a high proportion of new housing, while such serious constraints remain an issue.

3.7.7 What is immediately concerning is that VALP does not seem to address this evidence in terms of deliverability. Anglian Water comments in response to Water Cycle Study:

“In relation to Buckingham WRC it is important to note that we are currently progressing a scheme to accommodate growth as part of the current Asset Management Plan period (2015-2020). Please note that this scheme has a design horizon of 2021. Anglian Water have confirmed that Buckingham WwTw remains as “red” assessment for both periods of 1-5 years and 6-15 years.”

and also the Recommendation at 5.4.7:

“AVDC to take into account the available WwTw capacity in phasing development going into same WwTw”.

3.7.8 Yet on site allocations for Buckingham:

BUC043 – 130 homes between 2018 and 2023

BUC051 – 100 homes to be delivered 2018-23 [200 2024-2033]

BUC046 – 100 homes between 2018-23 [320 homes 2024-2033]

This is in addition to the provision within BNDP for 617 homes and 400 student units as well as windfall development – all potentially possible within the first five years.

3.7.9 This does not seem to accord with the recommendation above, and it is not explained how at paragraph 4.128 of VALP:

“The Water Cycle Study (2017) assessed the impact of growth on water cycle infrastructure in the village. The following policy is to ensure that growth takes place with any upgrades to the treatment works that may be needed.”

The first, obvious, point is that Buckingham is not a village. The second point that is perhaps not just a careless mistake is that how this policy achieves this in terms of site allocations and phasing is not made out in answer to the points raised within the Water Cycle Study document itself.

3.7.10 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.

3.7.11 This may not lead to quick delivery, if construction cannot be undertaken in its absence.

3.7.12 BUC 043 – Land west of AVDLP allocation BU1 Moreton Road, Buckingham

3.7.12.1 This site 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 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.

3.7.12.2 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."

3.7.12.3 It may be that AVDC has tried to reserve its position by stating that any allocated site in the Plan [see above] is exempt from this strategic policy, but Buckingham Town Council 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.

3.7.12.4 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.

3.7.12.5 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.

3.7.12.6 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 the 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.

3.7.12.7 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**.

3.7.12.8 To be sound it is submitted that AVDC should honestly address the fact that by these allocations coalescence will be achieved and should show strategic planning to that effect; combine the housing numbers for the two settlements; or allocate alternative sites.

3.7.12.9 It should be noted that it is "Part suitable" under HELAA as the northwest corner is 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 Road] which is not deemed suitable until BUC043 is built out [on basis of previous AVDLP allocation].

3.7.12.10 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.

3.7.13.1 BUC 046 – Land off Osier Way (South of A421 and east of Gawcott Road)

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.

- 3.7.13.2 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.
- 3.7.13.3 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.
- 3.7.13.4 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.
- 3.7.13.5 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.

3.7.14 Water Cycle Study

- 3.7.14.1 As regards both sites, the allocation of additional sites on top of the sites already allocated in BNDP is not fully justified against the supporting evidence contained within the Water Cycle Study [Aylesbury Vale Water Cycle Study (Final) 2016, JBA Consulting, part of Supporting Evidence]. In this document there are two issues for Buckingham:

- (i) The inability to deal with phosphorus, and the observation that this may be a constraint on development in Buckingham;
- (ii) The requirement of sewerage infrastructure – whilst this may be provided by Anglian Water under the Asset Management Programme and also potentially from developer contributions – this would seem to have an effect on deliverability of the sites within the proposed timescales; and also to the viability of the development. The concern is that in potential contributions to sewerage infrastructure, developers will be able to assert viability concerns against requirements for affordable housing levels and other infrastructure, thereby not delivering sustainable development for Buckingham.

If Buckingham is to remain a strategic settlement, a clearer policy as to how to upgrade WwTw needs to be provided if deliverability and viability issues are to be met, and to justify the additional allocation within the deliverability timescale set out.

(4) Employment

4.1 Silverstone –

- (i) Distance from strategic settlement and transport links;
- (ii) Not reviewed since 2009

4.2 Allocated employment sites in BNDP not protected :-

- (i) acknowledges success of Buckingham Industrial Park and protects it but does not allow/safeguard sites for expansion;
- (ii) in light of transport difficulties to Silverstone outlined above this is not a certainty as to employment for the strategic settlement of Buckingham and the north of the district, especially as it partly lies in South Northants District.

(5) Education

5.1 Despite stating this as a specific part of the Strategic Objectives [VALP paragraph 2.6 Objective 3 (a) “The Council, working with its partners, will secure timely and well-located provision of infrastructure, services and facilities needed to sustain and enhance existing and new communities including **education, training** and access to community facilities such as shops and community buildings.” (emphasis added)] and also a Spatial Vision VALP paragraph 2.4 (f) “Growth will allow people in the District to have access to excellent education and training, both academically and vocationally with opportunities for life-long learning accessible to all.”] there is very little in the Plan to deliver this vision.

- 5.1.1 In fact there are no strategic policies regarding education, so it is difficult to see how this will be delivered and thus goes to the soundness of the Plan.
- a. Salden Chase – NLV0001 – Provision as to education – a secondary school is mentioned in the box pertaining to key development and land use requirements but the site specific requirements as to Education only make mention of provision of land for new schools and pre-school facilities. As part of Buckingham County Council area, residents will be eligible for Grammar School places under the 11+ scheme. Given the attraction and reputation of the local Grammar schools, and that the land falls within the catchment area of the Royal Latin School in Buckingham, some provision should be made for a contribution to this school in addition to the new secondary school as it might be assumed that as 11+ exam results in the selection of around 25-30% of primary school children [even allowing for those individuals who elect for the new secondary school; faith schools in Milton Keynes; private education or home schooling] a significant number of secondary school pupils may well attend the Royal Latin School. The school itself believes that it is one of the most underfunded schools in England & Wales at the current time.
- 5.2.1 There is in fact a potential answer given in the Infrastructure Delivery Plan [part of the Supporting Evidence to VALP, at p.23] which suggests that it would be better to redraw the boundary of Milton Keynes to include this expansion from a point of view of schools, thus making it a catchment area for Milton Keynes schools as opposed to Buckinghamshire County Council's selective grammar school system.
- 5.2.2 However, this policy is not set out in VALP, and if in fact Milton Keynes Council is not prepared to accept this proposal [there is no indication in the Infrastructure Delivery Plan of any consultation on this or the likelihood of it being delivered/agreed] then VALP remains ill-equipped to deliver on education for the District.
- b. In the Spatial Vision for Buckingham [VALP paragraph 2.4 (h)(4)] it is stated that "Buckingham, led by neighbourhood planning, will have grown and will:... be a hub for higher education and skills through growth and enhancement of the University of Buckingham and other facilities which support job training and skills."
- 5.3.1 The University is mentioned again at paragraph 4.127 in the Strategic Delivery where the BNDP is mentioned as containing allocation for 400 student units. This would seem to be protected under **S1**.
- 5.3.2 There is one other reference to education in that of the University Technical College at Silverstone, although this is outside of the District area.
- 5.3.3 There remains concern as to the deliverability as no specific policies are to be found. There is some concern that leaving provision of infrastructure to s106 agreement negotiation will leave delivery vulnerable to viability assessments. Whilst provisions are made within

site allocations eg Salden Chase, the accumulated effect of a number of smaller developments within an area such as Buckingham [especially when Maids Moreton allocation is also included] means that no one site would be large enough on which to require a new school. There is no delivery strategy for such need.

6 Transport

6.1.1 Cambridge/Oxford Expressway – T3

There should be protection afforded to possible routes, which can be lifted as appropriate once a final decision is reached. The allocation of BUC046 may in fact have an impact on the potential route as BTS Figure 7.4 gives an indicative route for a southern A421 by-pass for Buckingham, which lies very close to this allocated site. It may be that such a major expressway would not be sited so close to the town, but it indicates the inherent dangers of the “do nothing” approach, where one preferred option may be lost due to intermediate development. The development on BUC046 has a phasing allowing almost immediate start to the site.

- 6.1.2 It is submitted that it is not sound to adopt a “do nothing approach” in the face of such a major central government infrastructure plan, and that proactive protection should be given to likely areas for the three routes within the district until such time as the route emerges. This, of course, could also be kept under review, but it would prevent routes inadvertently being affected; or alternatively alter phasing on site BUC046.

6.2 Transport links to Silverstone Park

- 6.2.1 If Silverstone Park is a key employment area, then better transport links are required between the nearest strategic settlement ie Buckingham and the Park for employment purposes; better public transport links would aid not only access employment opportunities but also educational opportunities at the University College [there is a very limited educational route at present].
- 6.2.2 There should be a policy seeking a north/south public transport system to link the rest of the district to these employment opportunities, along with a connection to the new East-West Rail service, which is envisaged will open up the district in terms of public transport. This is not just a matter for BTC but a district wide issue, allowing access to one of the key employment sites. There is internal inconsistency between policies of employment and transport and delivery. There is no delivery on employment if it is difficult to reach the site using public transport, and even if car is used, the roads between the strategic settlement of Buckingham and Silverstone Park are poor.
- 6.2.3 This amounts to a lack of effective delivery going to the soundness of the Plan.