

## Buckingham Town Council Responses to VALP Main Modifications Consultation

1.1. **Buckingham Town Council submitted the following** response to Aylesbury Vale’s District Council’s consultation on the proposed main modifications to the proposed Vale of Aylesbury Local Plan.

### 2. Summary of Key Points

- 2.1. Removal of BUC051 – which is reserve site M in BNDP - the new modelling of traffic congestion is highly selective and does not consider whether similar unacceptable congestion would be created by other allocated sites that remain. This does not justify the removal of this site alone from VALP;
- 2.2. Western Relief Road which is part of the Buckingham Transport Strategy [BTS] has not been included in VALP, despite BTS remaining part of the evidence base for VALP.
- 2.3. Affordable Homes percentage may be retained in existing BNDP but not any future NDPs, even if there was sufficient evidence to support. Suggestion that future NDPs be included in this policy with the proviso that such a figure would need to be supported with robust evidence.
- 2.4. Request that additional evidence on (3), which was not heard at Public Hearings in July 2018, now be included in support.

### 3. Submitted Comments by Modification

Modification Reference Modification Number Page Reference/paragraph or policy reference	Modification	BTC Comment
MM007/p.27/paragraph 26 point 4	Development will be allocated in accordance with the settlement hierarchy taking a capacity-led approach. It is also an Aylesbury Garden Town first approach. Therefore the main focus of development will be in sustainable locations at Aylesbury Garden Town where the majority of development will be located. The remainder of housing will be then be located in the next most sustainable locations, the other strategic settlements, which are Buckingham, Haddenham, Winslow and Wendover, the north east of Aylesbury	Given the removal of 300 homes at BUC 051 and the Buckingham Transport Strategy further modelling indicating that other sites are not feasible (it will be argued that the modelling does not support the remaining sites in VALP either) then this is no longer a valid statement as regards Buckingham.

	Vale adjacent to Milton Keynes, together with an appropriate level of development at the most sustainable settlements in the rural areas.	
MM010/34/S2	<p>The primary focus of strategic levels of growth and investment will be at Aylesbury, and development at Buckingham, Winslow, Wendover and Haddenham supported by growth at other larger, medium and smaller villages. The strategy also allocates growth at a site adjacent to Milton Keynes which reflects its status as a strategic settlement immediately adjacent to Aylesbury Vale District.</p> <p>The spatial distribution will be as set out below.</p>	<p>Again previous point as to whether Buckingham should be included within the areas of growth/development, as this would not seem to be possible as a result of the new modelling undertaken under the Buckingham Transport Strategy.</p> <p>If development is not possible on the basis of the new evidence of the Buckingham Transport Strategy [see below] then if Buckingham remains named as an area of focus for development, then it leaves it open to speculative development in the future, especially if allocated sites are withdrawn. BUC051 is also an allocated site in the BNDP 2015 which carries the support of the residents of Buckingham. If there is concern as to viability of the sites due to BTS new modelling, then Buckingham needs to be withdrawn from the settlement designation to protect from speculative development brought forward on the basis of housing need [as stated in MM079 115/4.122] and subsequent transport modelling. It is submitted that this does not demonstrate internal consistency within the approach of VALP post last minute removal of site BUC051.</p>
MM010/34/S2 at paragraph b	b. Buckingham will accommodate growth of [2,359] <b>2,166</b> new homes. This, growth will enhance the town centre and its function as	Again on the basis of the updated modelling under Buckingham Transport Strategy, it is not demonstrated that other allocated sites in

	a market town, and will support sustainable economic growth in the north of the district.	Buckingham will not cause the same traffic problems, therefore those sites should not be included either reducing the total by 550 [130 + 420] leaving the only growth that which has already been established in the VALP time period.
MM020 55/S8/3.75	<p>3.75 To support neighbourhood plans and clarify their relationship with the Local Plan the local planning authority will expect the following principles to be applied in the development of neighbourhood plans. Neighbourhood plans should:</p> <p>a. show how they are contributing towards the strategic policies of the Local Plan and be in general conformity with its strategic approach</p> <p>b. clearly set out how they will promote sustainable development at the same level or above that which would be delivered through the Local Plan, and have regard to information on local need for new homes, jobs and facilities, for their plan area.</p> <p>c. Identify development opportunities in accordance with table 2 and policy H2 of this plan</p>	<p>(i) paragraph a – the only legal requirement for NDPs stated here is whether they are in general conformity with the strategic policies of the Local Plan; it is questionable whether this needs to be reiterated as it is a legal requirement; the first part is an attempt to direct a NDP’s format, and again is probably unnecessary as a well made NDP would do this in order to conform with the legal requirement stated.</p> <p>(ii) paragraph b – these are obligations already placed by NPPF so again it is not clear why it should be repeated;</p> <p>(iii) paragraph c – it is stated that “Neighbourhood plans <b>should</b>” – identify development opportunities – this seeks to place a requirement on NDPs that does not exist in law – NDPs do not have to identify development opportunities. If it is meant as general guidance, suggested “may” for paragraph c replaces “should”. Paragraph c was added at Modifications stage.</p>
MM070 109/New Policy	Buckingham, Haddenham and Winslow all have neighbourhood plans which have had a high level of community support, albeit the housing policies in the Haddenham neighbourhood plan have since been quashed. This Plan aims to reflect the need for housing	Given the evidence used to justify the removal of BUC051 and other potential future sites, then it is no longer possible to claim that Buckingham is the second most sustainable site, as there is little potential for future growth to sustain services, if sites cannot come forward due to traffic

	<p>delivery in the most sustainable locations whilst not undermining the aims of the neighbourhood plans, taking the quashed allocations, where possible, in the Haddenham neighbourhood plan as the community's preference for the location of development. This Plan allocates the reserve sites at Buckingham and Haddenham, and just one site beyond the neighbourhood plans's expectations/allocations, at Haddenham and Winslow, specifically north of Rosemary Lane at Haddenham (at least 315269 homes) and east of the B4033 at Winslow (585at least 315 ), and allocates two further sites at Buckingham, reflecting it being the second most sustainable settlement in the district, specifically Moreton Road at Buckingham (130 homes) and land off Osier Way, south of A421 and east of Gawcott Road (420 homes).</p>	<p>problems. The new evidence does not demonstrate sufficiently why these two sites will not impact on the traffic in Buckingham. BTC would also refer to previous representations to the original consultation as to the lack of popular support for these sites.</p>
<p>MM076 114/DWHA001 paragraph d</p>	<p>d. Subject to detailed discussions and agreement with the Education Authority, a financial contribution towards existing secondary schools will be required or provision of a site for a new secondary school if the need for an on site facility is proven; and a financial contribution to special needs education</p>	<p>Although "existing secondary schools" could be interpreted to include grammar schools, there should be clear provision for the Royal Latin School, (as the site will be in its catchment area for any suitably qualified secondary pupils), should a new secondary school be provided on site as this would seem to negate a financial contribution towards existing secondary schools, and thus with the increased number of houses on this site, there could be a significant number of suitably qualified pupils</p>

		seeking a place at the local grammar school, but without any financial provision to the school.
MM079 115/4.122		Please see comments on MM070 109/New Policy above.
MM082 119/D-BUC043 paragraph I	I. A financial contribution will be needed towards funding appropriate elements of the Buckingham Transport Strategy	BTC believe that this will not be sufficient to alleviate the traffic problems. There is inconsistency within VALP in that Silverstone is stated to be a major employment site, but given the condition of the roads from Buckingham to Silverstone, it is possible that employees will attempt to access via the A43 – this would take traffic through the town, and a filter lane at the A422 roundabout would not assist. The BTS also does not explain how traffic using Mill Lane accessed through Maids Moreton will be alleviated or the road upgraded to cope with this or the new development at Maids Moreton. It should be dependent on further traffic modelling in the same manner as BUC051.
MM083 120/D-BUC051	Delete BUC051	Please see separate document
MM084 121/D-BUC046	Neighbourhood plan, made in October 2015. The land has no notation but is outside the settlement boundary. The neighbourhood plan is in early stages of review.	(i)Unclear as to the relevance of the neighbourhood development plan being in the early stages of review. This would seem to have no bearing and at worst, appears to assume that settlement boundary might change to accommodate this development which is presumptuous. (ii) Site D-BUC043 is also outside of the settlement boundary in the BNDP – the site details above do not include this statement. This may be misleading to the effect that the proposed site lies within this boundary.

		Either this statement needs to be omitted here, or it should also be included as regards BUC043.
	d. The development must provide a satisfactory vehicular access to be agreed with Buckinghamshire County Council. The primary vehicular access should be off Gawcott Road and Osier Way. A transport assessment will be required to demonstrate access and impact are acceptable and achievable by all modes of transport	There is no explanation as to the addition of an access point on a road accessing the industrial estate and a retail park. Again BTC make the point that the additional traffic modelling used to exclude BUC051 was not run against this development; yet a potential site further along the same route to the west was ruled out. BTC assert that there needs to be further traffic modelling undertaken on all Buckingham sites before they are allocated.
	i. A financial contribution will be required towards funding appropriate elements of the Buckingham Transport Strategy	BTC believe that this will not be sufficient to alleviate the traffic problems. It is not clear how a proportionate financial contribution from this or from pooled contributions would finance the necessary improvements.
MM097 134/4.154	Sites allocated in this Plan or in a made Neighbourhood Plan or committed by planning permission will normally deliver the district's required level of growth in full. Proposals for development in other locations will be determined on the basis of the policies within this Plan and made Neighbourhood plans. Exceptionally Additional larger scale development proposed in the medium villages on sites that are not allocated either in the Local Plan or neighbourhood plan will only be permitted in exceptional circumstances where it can be demonstrated through the	The BTC makes the following observations which demonstrate that policies as to allocations in villages within VALP have not been internally consistent and that D-MMO006 has been granted planning permission in contradiction to the policies set out in VALP. MM090 129/4.143 gives housing allocation figures for "larger villages" the largest number 118 for Steeple Claydon has now been withdrawn; other allocations are 22 & 26 in number. MM096 134/4.153 "medium villages" [BTC maintains that Maids Moreton is incorrectly designated as a medium village by the criteria set out in VALP] gives 170 to Maids Moreton, whereas other

	<p>council's monitoring of housing delivery that sites allocated are not being delivered</p> <p>coming forward at the rate anticipated. Proposals will need to be accompanied by evidence demonstrating how the site can be delivered in a timely manner, along with satisfying the each of the criteria set out in Policy D2 D4 above.</p>	<p>"medium villages" the numbers range from 9-37.</p>
<p>MM101 138/D-MMO 006</p>	<p>A satisfactory new vehicular means of access to Foscote Road and Walnut Drive, including satisfactory visibility splays to Foscote Road, a scheme for parking, garaging, manoeuvring and a cycling and walking movement strategy needs to be proposed</p> <p>in a transport assessment and transport statement must be agreed by the Council setting out necessary highways improvements including triggers associated with the progress of the development</p>	<p>BTC notes that this site was dropped from the original VALP and then hastily reinserted. The original reason for omission was objections from Bucks CC over traffic. Concerns that were quickly overcome after discussions with developer, and which led to re-inclusion. Questions as to whether this led to unfairness to residents of Maids Moreton at the Public Hearings in July 2018 will no doubt be rehearsed by others. BTC maintains two points here:</p> <p>(i) That a traffic problem deemed so serious that it led to a withdrawal of this site from the draft Local Plan, was evidently easily remedied to allow its re-inclusion. Why might this not be the case as regards BUC051?</p> <p>(ii) this major development in an adjacent village with almost no services or amenities will inevitably impact on Buckingham; in addition traffic will access the A422 roundabout through the town centre via A413 – adding to what BTS recognises as a serious traffic problem and confirmed in ED214A&amp;B. BTC would suggest that this is further evidence of why much more extensive and less selective traffic</p>

		modelling is now required via BTS for all allocated sites with a potential impact on Buckingham traffic.
MM 115 166/H1	<p>Residential developments of 11 or more dwellings gross or sites of 0.3ha or more will be required to provide a minimum of 25% affordable homes on site <u>except where a different requirement already applies in a neighbourhood plan which has been made before the adoption of VALP.</u></p>	<p>BTC welcomes the acknowledgement inherent that the figure of 25% is too low for some areas, if not all. BTC hopes that this will prompt the inspector to consider the evidence which was not brought forward at the Public Hearings in July 2018 – about which there has been separate direct correspondence with the inspector.</p> <p>What is less acceptable is that AVDC have sought to put constraints on future NDPs. BTC can now only proceed with a new or refreshed NDP if it is prepared to lose the requirement of 35% affordable homes contained in the current Plan, which is saved here only in an existing Plan, even if there was appropriate evidence to support this.</p> <p>BTC asks that this is modified to include future NDPs where strong evidence exists that the NDP Area has need of a higher figure of affordable housing. There is no need to remind the inspector that NDPs must be tested at Independent Examination alongside the supporting evidence; there would be no danger of a NDP lacking said evidence, and/or not being in general conformity with the strategic policies of the Local Plan being made. This is a restrictive saving clause and we suggest that it is modified as proposed.</p>
MM152 177/H6a		BTC welcomes and supports the policy to deliver the required housing needs mix, and the recognition of the

		role of NDPs in delivering this.
MM170 179/H6c		BTC welcomes and supports the delivery of wheelchair accessibility to the maximum permitted by Central Government policy and provisions.
MM204 202/7.8	The growth aspirations in the VALP are likely to have an impact on transport requirements in Buckingham; any and may therefore necessitate a number of improvements in/around the town. The aim of the Buckingham Transport Strategy (BTS) is to consider these growth aspirations holistically and propose measures that address their impacts as a whole, rather than the impact of each individual development and support schemes contained in VALP.	Contradictory evidence is now presented. BTS takes a holistic approach, but ED 214A&B take a selective site based approach to justify a major modification which undermines the BTS. The conclusions drawn from ED214 A&B and ED 215A, expressed in ED 215B are flawed.
MM205 202 7.10	The BTS has been used as one of a series of evidence documents to support the infrastructure identified in VALP under Policy T3.	This evidence is contradictory. The BTS may represent as claimed a holistic approach, and further evidence such as ED214A&B a more detailed individualised approach, but there is no explanation of why the Western Relief Road has been dropped, and why lower scoring mitigation has been prioritised. References in site allocations MM006; BUC046 etc. to contributions to BTS infrastructure give no guidance/confused guidance as to priority of the possible mitigations.
MM206 203/T1	The Council will assist in delivering the pedestrian, cycle, public transportation and public realm improvements to deliver the Aylesbury Garden Town initiative as well as any <b>required</b> improvements to the	References to Buckingham Transport Strategy have been deleted and presumably its proposals are no longer part of the T1. Therefore, what is the status of the BTS and references throughout VALP? This seems to present a confused

	transportation network in Buckingham and other areas of district as required to deliver sustainable, healthy and thriving communities.	picture, and how will “required” improvements be identified?
MM210 205 T3	The council will actively support key transport proposals including those identified in both the Aylesbury Transport Strategy and Buckingham Transport Strategy.	Key transport strategies from BTS are identified for medium term as A413 road improvements and the A422 left hand slip road. The cost of A413 improvements is “tbc” in T3 so there is no available evidence to suggest that this will be deliverable by developer contributions any more so than the Western Relief Road which has not been included in T3 schemes here – presumably on non deliverability grounds – otherwise it is the highest scoring mitigation in BTS. This is not consistent.
MM218 209/T7	Detailed requirements for provision of electric car charging points	BTC welcomes this detailed guidance on requirements to ensure provision of options for residents
MM243 252/C3	Detailed guidance as to greater efficiency in use of natural resources in all developments	BTC welcomes this detailed guidance.
MM2271 262/Policy T3	A financial contribution will be required subject to compliance with the CIL Regulations to provide or enhance community facilities or community infrastructure on developments of more than 10 homes and which have maximum combined gross floorspace of more than 1,000 square metres (gross internal area)	This addition would seem to exclude other forms of developer contributions. AVDC at present has not adopted CIL; there appear to be no plans to do so in the near future, and as this will then be a decision for the unitary council, it will be substantially into the lifetime of this plan before such a provision could become operative. Suggest that this is amended to include other forms of developer contribution as it does not seem to be deliverable otherwise.
MM277 274 Glossary definition of town centres	Defined Town Centres – A locally designated area which defines the extent of a	Request that it is stated that Buckingham Town Centre is designated in Buckingham Neighbourhood

	town centre. The defined town centres of Aylesbury Vale are located in Aylesbury, Buckingham, Winslow and Wendover respectively. The extent of the defined town centres are specified on the policies maps	Development Plan to ensure that the town centre definition is not fixed by VALP precluding revision by a future revision/new NDP [the potential for which is acknowledged elsewhere in VALP].
MM283 290 Policies Map	Wharf Yard site – allocated in BNDP [ <b>EE2 – Allocation of land for retail, office and mixed development</b> ] remove committed designation to allocation in NDP	To clarify that this NDP allocation is still covered by D5 in VALP” D5 Provision of employment land Employment development will generally be supported in sustainable locations: a. through allocations in this plan and appropriate allocations in neighbourhood plans”

#### **4. Detailed Response to the removal of BUC051 [BNDP Reserve Site M]**

4.1. A more detailed response is given than can be comfortably fitted into the above table. For the benefit of councillors, the evidence base for the decision by AVDC is included below in bold. This is document ED 215 at [https://www.aylesburyvaledc.gov.uk/sites/default/files/page\\_downloads/ED215B%20AVDC%20Note%20on%20Buckingham%20VALP%20Allocations%20%28May%202019%29%20%20.pdf](https://www.aylesburyvaledc.gov.uk/sites/default/files/page_downloads/ED215B%20AVDC%20Note%20on%20Buckingham%20VALP%20Allocations%20%28May%202019%29%20%20.pdf)

#### **4.2. Note on Buckingham VALP Allocations (ED 215B)**

4.3. Submission VALP allocated three sites at Buckingham including site BUC051 - 300 houses on the western edge of the town south of the A422 Brackley Road.

4.4. The site BUC051 first came to the Council's attention as a Call for Site promoted in May 2014 for consideration in the VALP. However the allocation of BUC051 for around 300 homes derives from the Buckingham Neighbourhood Development Plan (BNDP) (Made Version October 2015) – identified as Site M in the BNDP. Policy HP1 of the BNDP allocates a total of five sites (Sites G – K) for 617 dwellings. Site M is confirmed in HP1 as a Reserve site of 300 dwellings that will only be required if one or more of the allocated sites (in the BNDP), with a total of 80 outstanding units is not brought forward before 2025. Notably only two sites G (400) and I (100) have more than 80 units in total, and the council is confident that both of these sites will be brought forward before 2025. It is therefore considered that it is highly unlikely that this reserved site will need to be brought forward and it is no longer considered appropriate to allocate this site in the Local Plan.

4.5. Debate at the Examination (17 July 2018 Day 5 Agenda Session 25) considered the dependency in full or part of the BUC051 site coming forward before the delivery of a Western Relief Road between the A421 Buckingham Bypass & the A422 Brackley Road to relieve traffic impact on Buckingham Town Centre which was an issue that had been raised by the county council immediately prior to the hearing session and they attended the hearing session to explain this.

4.6. The Inspector in his interim findings acknowledged this in para 49 of his Interim Findings where he states “during a hearing session it became apparent that BUC051 is dependent on a road proposal contained within the Buckingham Transport Strategy but nowhere mentioned in VALP”. However it was suggested by the Councils at the examination that part of the site might be able to proceed before the provision of the Western Relief Road, but this would depend on a more detailed assessment of traffic impacts on Buckingham town centre.

4.7. Accordingly, the Councils (AVDC & BCC) commissioned further detailed modelling work to fully understand the traffic impacts on Buckingham town centre and agree how much of Site BUC051 could come forward before mitigation in the form of a new link road between the A421 & A422 (Western Relief Road) was required.

- 4.8. That work is complete and the Highway Authority BCC has considered the outputs of the Buckingham Town Centre Modelling Report (May 2019) and concludes that: “In relation to Buckingham, our view is that the detailed town centre modelling shows that BUC051 would have an unacceptable impact on the town centre, even if the development was phased. The only mitigation to congestion in the town centre that we have been able to identify is the Western Relief Road, as set out in the Buckingham Transport Strategy.
- 4.9. However, it has been acknowledged that the scale of the proposed BUC051 allocation would be insufficient to provide funding for this mitigation measure. One option would be to increase the size of the allocation in order that the development was able to deliver the relief road. However, this would lead to a much larger allocation at Buckingham resulting in further modelling work being required to assess the potential impact on the A421. This suggestion does not take into account any site constraints such as flood risk. The second option would be to delete the BUC051 site from the draft VALP”.
- 4.10. Moreover, the Inspector in his interim findings paragraph 36 noted that “Whilst accepting that the Buckingham and Winslow Neighbourhood Plans seek to make those towns much more self-contained communities and recognising that all settlements must be allowed to grow to retain their vitality and viability, the contrast between the north of the district where the dominant settlement is not allowed to dominate the development strategy and the south of the district where the dominant settlement is encouraged to dominate the development strategy is startling. It is hard to escape the conclusion expressed by several representations that the spatial strategy in the north of the district would lead to increased lengths of commuting flows to and from Milton Keynes”.
- 4.11. The Inspector concludes in paragraph 37 that:- “This would be contrary to national policy expressed in paragraph 34 of the NPPF which advises that plans should ensure that developments which generate significant movement are located where the need to travel will be minimised. It is therefore unsound. A modification to the plan is required to redress the balance, by increasing allocations in close proximity to Milton Keynes. For reasons summarised earlier, I reach the conclusion that insufficient land has been identified for housing and that additional allocations need to be made. This inevitably means revisiting the decision which led to the spatial development strategy known as option 3 in the Sustainability Appraisal being selected for VALP and so gives rise to an opportunity to redress the balance of the chosen spatial development strategy in the north of the district”.

## **5. Conclusions**

- 5.1. BUC051 is allocated within the Neighbourhood Plan as a reserve site –but there is no reason to believe that the need for the Reserve site will be triggered given the level of development that will occur through other sites allocated in the Neighbourhood Plan.
- 5.2. BUC051 is not critical to the spatial strategy of VALP or to the needs of Buckingham. Even without the 300 homes of BUC051, Buckingham would still

deliver 2,009 homes, 1,509 of which are commitments and completions as at March 2017. This level of development still generally reflects the character of Buckingham and is a sustainable level of development to support its role and function, consistent with the VALP strategy for settlement hierarchy and cohesive development at para 3.19.

- 5.3. Further detailed modelling work undertaken by the Council has identified unacceptable traffic impacts from this allocation on Buckingham Town Centre without significant mitigation in place – the Western Relief Road. The view of the Highway Authority is that the allocation should be deleted from VALP.
- 5.4. The Inspector identifies the need to redress the imbalance of the spatial strategy by increasing allocations in close proximity to Milton Keynes to minimise the need for travel in line with the NPPF. It is considered that the shortfall of 300 units can be made good as part of a larger allocation at Milton Keynes.

## **6. Proposed Modification**

- 6.1. That BUC051 be deleted as an allocation at Buckingham because of unacceptable traffic impacts on Buckingham Town Centre and that the 300 dwellings be included in the increased allocations in close proximity to Milton Keynes.

### **6.2. Proposed Response of Buckingham Town Council to Main Modification 083**

The removal of this site is based on flawed and incomplete evidence in the view of the Buckingham Town Council, which means that it is not soundly based on evidence. The implications of the removal of this site for VALP have not been reflected in the rest of the document and which makes the Plan unsound through lack of internal consistency.

### **6.3. AVDC's justification for removal of site:**

- 6.3.1. In Paragraph 2 there appears to be an incorrect assumption made regarding other sites in the BNDP [Site references are those of the BNDP]. To quote ED 215B -“The reserved allocated site, Site M, will only be required if one or more of the allocated sites with a total of 80 outstanding units is not brought forward before 2025.” It is then stated that the council is confident that Sites G & I (having an allocation of 400 & 100 respectively) will be brought forward by then.
- 6.3.2. Site G (400) has indeed been brought forward and is under construction, along with site H (50) homes as part of the St Rumbold's Fields development.
- 6.3.3. It is noted elsewhere that Sites J (39) & K (28) are unlikely to be brought forward before 2023/2024 and there does not seem to be any immediate interest in developing these sites at present. If not brought forward by 2025 these sites could contribute to the shortfall of 100 houses which would trigger the release of the Reserve Site.
- 6.3.4. It is submitted that it is erroneous to assume that Site I will be brought forward by 2025. The site forms part of the Tingewick Road Industrial

Estate. Unit A is occupied, and Unit C has been recently renovated and is currently being marketed for let. BTC has been in contact with the letting agents who confirmed that their instructions from the owner were to let the premises. Given the renovation work, it is perhaps uncertain that the owner intends to sell the land for development in the near future.

6.3.5. There is a good possibility that the Reserve Site would have been triggered in 2025.

6.3.6. In paragraph 4, reference is made to the Inspector's Interim Findings (August, 2018) in particular paragraph 49 of that document.<sup>i</sup> The Inspector himself will be best placed to know his own meaning here, but it can be read to inquire as to why apparently necessary infrastructure to facilitate development is not included in VALP. This paragraph appears under the sub-heading *Infrastructure* and this site is one of a number so identified throughout the district cited therein. It is not abundantly clear that this was not simply pointing to the lack of completeness of the draft, rather than pointing out the potential non-viability of the site itself, although that appears to be the interpretation that AVDC has chosen to place upon it.

6.3.7. AVDC seeks to rely on the further modelling undertaken by BCC<sup>ii</sup> and the selection of the second option that produced, which was to remove the site from VALP<sup>iii</sup>. What was not then done was to consider properly where that would leave Buckingham as the second settlement during the Plan period. It is true to say that the BNDP has delivered significant housing through site allocations that are being developed as well as windfall, brownfield and infill numbers, facilitated by the BNDP's policies. The argument based on the available evidence set out in 2 below, demonstrates that it should not be Site M alone that is removed but the additional sites allocated by VALP. This leaves Buckingham with few options for sustainable growth unless a Western Link Road is part of the infrastructure, and that inability should be reflected in the whole of VALP with necessary modifications.

6.3.8. Again in paragraph 7 of ED215B, AVDC appears to be attributing its reasoning to the words of the Inspector in his Interim Findings. Paragraphs 36 & 37 are quoted.<sup>iv</sup> These paragraphs appear under the sub-heading *Spatial Development Strategy* and thus are not necessarily as aligned with paragraph 49 above, as AVDC seems to think. Again the Inspector will be best placed to know his own meaning, but the view of BTC is that this is a much wider discussion of policy in the context of a need for further housing allocation, and noting that the north of the Vale needed to provide housing for workers commuting to Milton Keynes, who would need to commute even further from the majority of housing allocation around Aylesbury. It is not necessarily apparent that it was a justification for removing housing allocations from Buckingham ( & Winslow and Steeple Claydon) and placing them in North East Aylesbury immediately adjacent to Milton Keynes. This is especially so when paragraph 35 of the Interim Findings is read – "Yet all three of the northern settlements lie within the Milton Keynes Travel to Work Area and the Milton Keynes Housing Market Area."<sup>v</sup> In

paragraph 36, there is an acknowledgement that Buckingham (& Winslow) are attempting to provide employment and services to ensure that they do not become dormitory towns for employment. In addition VALP itself denotes Silverstone as the major employment centre in the north of the Vale, but is placing a large amount of housing at a greater distance from that employment site.

6.3.9. BTC asserts that this interpretation by AVDC does not bear close scrutiny and thus does not justify the removal of site BUC051 in isolation from the rest of VALP as it seeks to do.

#### 6.4. Specific Evidence as to traffic congestion in Buckingham

6.4.1. The Buckingham Transport Strategy [BTS] is the main evidence document for transport infrastructure needs in Buckingham in the evidence base of VALP.<sup>vi</sup>

6.4.2. Although it is stated that further modelling etc. will be required, the BTS ranks in terms of priority the Western Link Road highest in terms of the goals of the BTS, primarily reduction of town centre congestion as a result of through traffic; and the left hand slip lane for A422/A413 roundabout the lowest.<sup>vii</sup>

6.4.3. In the BTS BUC051 is taken as a commitment and the additional development is at BUC025 [a site further west of BUC046 on the A422]; BUC043 [Moreton Road]; BUC046 [Osier Way]. It also assumes that Silverstone Park to the north is a future employment centre.

6.4.4. The additional modelling is supplied by ED 214A & ED 214B, the need for which is stated to have arisen out of a discussion at the Public Hearings in July 2018.

6.4.5. The conclusion is that a Western Link Road could not be supported by the level of development so far allocated. The first option suggested by BCC <sup>viii</sup> is to bring forward increased development, but that has been rejected by AVDC in favour of the second option, which is to remove BUC051 from VALP. Although not stated it could be assumed that with the time constraints on an already delayed Local Plan, this was the easiest & quickest option, but it was not the only option as appears to be suggested in ED 215B by AVDC. It is submitted that this is further evidence of the tendency identified by the Inspector in his Interim Findings to not place the same criteria to planning in the north of the Vale.

6.4.6. The problem is that the further modelling does not give the whole picture of the impact of all allocated development in Buckingham on the traffic congestion modelled to this level.

6.4.7. ED 214A by Jacobs considers the possibility of reducing the development at BUC051 to 125 homes, assuming that BUC043; BUC046 & MM006[DS2] remain as well as all development at original stated numbers [DS]:

6.5. "As requested by BCC, a Buckingham Town Centre Model was developed to assess the impacts of the proposed Local Plan developments on an already

congested Buckingham Town Centre, and also to assess if a reduced amount of development at BUC051 would be feasible without mitigation measures to remove traffic from the town centre. In this model, two roundabouts were included and assessed: Bridge Street/West Street/Market Square roundabout and Moreton Road/Stratford Road/Market Square roundabout.....

- 6.6. In summary, both town centre junctions are already operating over capacity in the 2033 DM and therefore the additional marginal impact at these junctions in the DS and DS2 scenarios is unacceptable, even with a reduced quantum of development in DS2. In both DS and DS2 scenarios, appropriate mitigation measures would need to be considered.”<sup>ix</sup>
- 6.7. The main focus is the two junctions: Bridge Street & West Street & Moreton Road/A422 Stratford Road. The conclusion being that even without development allocated, the junctions will be over capacity at the end of the Plan period.
- 6.8. So any further development will cause further congestion in the town centre – not just the addition of BUC051.
- 6.9. ED 214B runs modelling removing BUC025 and including BUC051 to the original Countywide modelling. This seemed to conclude that there was little difference.
- 6.10. What has been absent from the two new reports is any assessment of the impact of the other sites – MM06; BUC043 & BUC046.
- 6.11. BUC046 is a site on the A421 by-pass, it could be argued that traffic generated will use the A422 to either the A421 junction to Milton Keynes or continue to A413/422 roundabout. At this junction traffic heading towards Milton Keynes intuitively will not benefit from a left hand slip lane mitigation; traffic heading from Milton Keynes to BUC046 development may be assisted by it in that stated aim would be to avoid travelling through town centre. It seems unlikely that it would do so anyway unless to access town services.
- 6.12. Traffic from BUC046 heading to the major employment centre at Silverstone Park may still seek to access A413 from town centre or A43 from West Street.
- 6.13. BUC043 on the A413 Moreton Road. It is assumed that traffic heading to Milton Keynes will drive down to junction at A413/A422 [ignoring possible short cut down Addington Road to A422; or alternatively driving to Maids Moreton and accessing A422 via Mill Lane – this route already shows heavy use in the various models] and then proceed to A413/A422. There will still be traffic at this junction as the left hand slip lane encouraging traffic to use A413 to the west, will not assist in this direction of travel.
- 6.14. The reverse journey on return from Milton Keynes may be assisted by traffic using left hand slip lane, easing queues, and easing traffic entering town centre [though it is not apparent why traffic seeking to remain on A421 to the west would do so anyway. It will not assist traffic which wishes to remain on A422 to access A43 [though the left hand slip lane in conjunction with a Western Link Road further along would.] That is assuming vehicles have not used Mill Lane access to Maids Moreton.
- 6.15. It would appear intuitively that little is eased by mitigation measure.

- 6.16. MM06 would intuitively follow the same pattern as BUC043, except that it is much more likely that Mill Lane access to A422 would be used. The current levels of use of this road are clear on the modelling diagrams, although it is not the focus of the reports.
- 6.17. This mitigation scored the lowest of the possibilities in the BTS.
- 6.18. There is no evidence presented by AVDC as to why removing BUC051 prevents further traffic congestion as opposed to the removal of BUC046 & BUC043 as development sites. ED 214B suggests that removing BUC025 and replacing it with BUC051 has little impact. Therefore, it could be reasoned, albeit at a simple level, that BUC046, which is also sited on A421, could be removed. There has been no modelling done to prove or disprove this.
- 6.19. Given the findings as to the junctions, and given that MM006 & BUC043 will undoubtedly impact on one of these junctions substantially, it is surprising that no further modelling work evidence has been commissioned or brought forward by AVDC to justify the inclusion of these sites but the removal of BUC051.
- 6.20. BTC submits that there is insufficient holistic evidence to support the removal of BUC051 from VALP on the reasons given by AVDC.
- 6.21. As is stated above, there is no attempt to consider holistically the impact of this decision on the related policies within VALP as outlined above.

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<sup>i</sup> 49) In a number of instances, individual allocations provide an insight into what is proposed in these various external transport plans and strategies. Allocations AGT1, AGT2, AGT3, AGT4, AGT6 all refer to the provision of various link roads around Aylesbury, NLV001 requires various highway improvements and reservations connected with Milton Keynes and during a hearing session it became apparent that BUC051 is dependent on a road proposal contained within the Buckingham Transport Strategy but nowhere mentioned in VALP. It is not clear whether there remain other proposals, included in the various transport strategies but not shown in VALP, to which developments would need to comply or implement in accordance with policies T1, T2 and T3. Work needs to be done to identify specific proposals contained within the Buckinghamshire Local Transport Plan 4, the Aylesbury Transport Strategy and the Buckingham Transport Strategy and translate these into the plan as modifications in order to make it sound.

<sup>ii</sup> ED 214A & ED214B

<sup>iii</sup> ED215A

<sup>iv</sup> 36) Whilst accepting that the Buckingham and Winslow Neighbourhood Plans seek to make those towns much more self contained communities and recognising that all settlements must be allowed to grow to retain their vitality and viability, the contrast between the north of the district where the dominant settlement is not allowed to dominate the development strategy and the south of the district where the dominant settlement is encouraged to dominate the development strategy is startling. It is hard to escape the conclusion expressed by several representations that the spatial strategy in the north of the district would lead to increased lengths of commuting flows to and from Milton Keynes.

37) This would be contrary to national policy expressed in paragraph 34 of the NPPF which advises that plans should ensure that developments which generate significant movement are located where the need to travel will be minimised. It is therefore unsound. A modification to the plan is required to redress the balance, by increasing allocations in close proximity to Milton Keynes. For reasons summarised earlier, I reach the conclusion that insufficient land has been identified for housing and that additional allocations need to be made. This inevitably means revisiting the decision which led to the spatial development strategy known as option 3 in the Sustainability Appraisal being selected for VALP and so gives rise to an opportunity to redress the balance of the chosen spatial development strategy in the north of the district.

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<sup>v</sup> 35) What is surprising is that within the northern half of the district the roles of Buckingham, Winslow and Milton Keynes are relatively equal in the anticipated distribution of development. Milton Keynes, the dominant settlement, is not expected to dominate the development strategy. This contrasts with the south of the district where the strategy concentrates most development around the dominant settlement, Aylesbury. Yet all three of the northern settlements lie within the Milton Keynes Travel to Work Area and the Milton Keynes Housing Market Area. This is further supported when the preceding paragraph is also read: 34) Although I conclude that the 24-28% of development expected to occur in the northern half of the District is not necessarily disproportionately low or unsound, it is fair to observe that analysis of the housing trajectory shows that delivery in the north of the district peaks in 2023/4, then tails off, with no allocations expected to deliver towards the end of the plan period.

<sup>vi</sup> <https://www.buckscc.gov.uk/media/4511792/buckingham-transport-strategy-final-jan-17-1.pdf>

<sup>vii</sup> 4.4.2 of Buckingham Transport Strategy.

<sup>viii</sup> ED 215A

<sup>ix</sup> Section 4 at p. 22 ED214A