

**MINUTES OF THE PLANNING COMMITTEE MEETING HELD ON  
MONDAY 6<sup>th</sup> JULY 2009 AT 7.20pm following the Extraordinary Council meeting**

**PRESENT:** Councillors Mrs. P. Desorgher  
P. Hirons  
A. Mahi  
M. Smith  
Mrs. P. Stevens  
R. Stuchbury  
M. Try  
W. Whyte (Chairman)

Also Attending: Cllr. H. Mordue

For the Town Clerk Mrs K.W. McElligott

**Apologies for absence**

Apologies were received and accepted from Councillor G. Loftus.

**211/09 Declarations of Interest**

There were no declarations of interest for items on the agenda.

**212/09 Minutes of the previous meeting**

The minutes of the Planning Committee Meeting held on Monday 8<sup>th</sup> June 2009 ratified on 29<sup>th</sup> June 2009 were noted. There were no matters arising.

*Proposed by Cllr. Stuchbury, seconded by Cllr. Try, and **AGREED** that item 11.1 on the agenda be taken next.*

**213/09 Any other planning matters: To receive the report on the Core Strategy document and agree a response.**

A detailed list of comments had been circulated to Members for the meeting.  
The document as amended is attached to these minutes.

*Cllr. Stevens left the meeting after the discussion of clause 2.6.12.  
Cllr. Mordue left the meeting after the discussion of CS11 IV.*

Cllrs. Whyte, Hirons and Smith were thanked for their hard work in preparing the response. The response would be published on the website and circulated to the stakeholders (inc. District & County Councillors), the MP and the *Advertiser*.

*Proposed by Cllr. Whyte, seconded by Cllr. Stuchbury, and **AGREED** that application 4 on the agenda be taken next, followed by agenda item 11.4.*

**214/09** This application had been referred back from Full Council 29<sup>th</sup> June 2009:

**09/01035/AOP** Land to South of A421 and East of A413 **OPPOSE**  
Comprehensive development of land comprising of 700 new dwellings (including affordable housing), primary school, employment land, healthcare, outdoor playspace, changing pavilion, landscaping, and creation of drainage detention basin and highway, cycle and pedestrian provision.

Full Council had agreed that the comments made on the previous application (08/02379/AOP) should be reiterated and added to. Members felt that the following should be added:

- *Water retention and slow release is critical for this site due to existing problems with flooding in the town, and to residents immediately north of the site. Once the balancing pond is full water will run over the bypass and flood Osprey Way as happens at present. The culvert under the road must be upgraded so as not to prejudice the existing development, and other measures taken to improve storage and slow run-off.*
- *the dualling of 400m of the A421 exacerbates the separation of the estate from the town and the additional pedestrian controlled crossing at a busy junction will worsen traffic conditions at busy periods.*
- *developer does not propose any road management or improvement of the A412/422 to A413 as identified in the Buckingham Plan.*
- *this Council is disappointed that no account seems to have been taken of the Buckingham Plan though the developer has a copy.*
- *No evidence of need, or local discussion of desire, for a primary school or healthcare facilities is provided.*
- *proposal falls far short of guideline provision of 1 job per dwelling which is identified as being the requirements in the proposed Core Strategy. The applicant refers to the Core Strategy to justify the proposed number of dwellings, therefore the applicant also needs to take into consideration other elements of the Core Strategy.*
- *However we note that the Core Strategy is still only a proposal, and this whole application is contrary to the existing local plans.*
- *Due to the large nature of the proposal, and its location on the edge of town, it would benefit from a Design Review by CABE to review its urban design and connectivity to the existing town.*

**215/09 To consider the appeal documents for 08/02379/AOP Land to the South of the A421 and East of the A413 and consider whether this Committee wishes to add further comments to the response to be drafted by the Town Clerk and Chairman as agreed at Full Council.**

Members discussed the Appeal Statement.

p2, para 1: "It is a high quality design..." Members pointed out that Outline Permission was being sought and no detailed plans were available.

"The scheme also accords with other important national guidance in respect of employment..." The SE Plan recommends 1 job per dwelling, which is not provided (which is also the proposal in the draft Core Strategy).

"...transport..." The SE Plan & MKSM subregional planning documents consider the A421 to be a strategic link and this development would inhibit future improvements to it.

"...and flood risk." Consideration of offsite flooding resulting from development of the site, notwithstanding the provision of a detention basin, is not evident.

p3/4, Deliverability,

1<sup>st</sup> bullet point: "There are no...other constraints." The Anglian Water Authority has indicated that headroom in the existing system is inadequate for the number of dwellings proposed.

2<sup>nd</sup> bullet point: "The site is located opposite Buckingham Industrial Estate..." The site is opposite one industrial unit and a Tesco store; access to the industrial estates is via the A421 bypass thus generating additional rush-hour traffic at the A413/A421 roundabout. Pedestrian access to the more remote employment areas is not feasible, although all are within cycling distance.

3<sup>rd</sup> bullet point: The A421 will prevent satisfactory integration with the town and will generate more short car journeys and pressure on town centre parking. There is no indication of a new bus stop on the drawings and the far eastern end of the site is some distance from the available stops on the western boundary. There is no streetlighting on the A421 rendering it unsafe for pedestrians and cyclists. The proposed pedestrian crossing of the A421 on the eastern side of the roundabout in combination with the existing crossing on the west side will clog peak hour flows more than happens at present. This will affect the viability of the industrial areas.

“High market demand” has not been demonstrated; several existing sites in the town remain only partly sold, and others with permission have been put on hold for the time being.

“The development could commence within two years... and would take approximately five years to complete”. Thus 58% of the target 1200 houses (in the draft Core Strategy) to be provided by 2026 would be, in theory, available in seven years. This Council supports slow incremental growth which can be absorbed by the town.

p4, Housing Land Supply

It should be a priority to use available brownfield land before greenfield sites (as identified in the draft Core Strategy).

p5, Conclusions

para 2 “... CS1....anticipates that sustainable locations around the edge of town will need to be found”. This is not so.

para 3 “...with no constraints ...that cannot be overcome.” The applicant admits that there are constraints (despite their claim in the Deliverability section, 1<sup>st</sup> bullet point, that there were no constraints). These constraints are not identified nor solutions suggested (we are already aware of the drainage and sewerage problems).

Members felt that the estate as proposed would develop as a separate community and not integrate with the town; that the Chairman, Vice Chairman and Clerk would agree the text of the response based on the above comments, formulate a press release, and circulate the result to all Councillors. The Committee agreed to send a representative, to be decided nearer the time, to the Appeal Session.

**ACTION CHAIRMAN/TOWN CLERK**

*Agenda order was resumed.*

**216/09 Action list**

5251.2 Cycle Racks. Cllr Smith would be copied the correspondence from Waitrose and discuss the matter with the local manager.

5289.1 & 129.1/09 Church Street. Another reminder would be sent.

5324 Flood protection. Members felt AVDC should provide guidelines in light of the grant funding now available for some householders, considering the fact that many of the affected houses were in the Conservation Area, or indeed listed..

45/09 A copy would be requested from the Committee Clerk, as Cllr. Sherwell had not responded.

5288.2 (Sustainable Communities Strategy cons.), 128.5 (Leisure Facilities Audit) and 129.5 (New Inn Stowe) could be removed from the list.

## 217/09 Planning Applications

The following planning applications were received and discussed. –

### 09/00878/AAD

**OPPOSE**

7 High Street

Erection of illuminated fascia and projecting sign

*Members felt that the lit area of fascia was excessive within the Conservation Area and there were no time restrictions; lights should be turned off at night for the benefit of residents opposite.*

### 09/01028/ATP

**SUPPORT**

Land to rear of 77 – 93 Fishers Field

Works to trees

### 09/01031/APP

**SUPPORT**

9 Chandos Close

Single storey front extension

### 09/01048/APP

**OPPOSE**

10 Meadway

Retention of shed to house disabled vehicle

*Members felt the materials used were inappropriate, unsympathetic and detrimental to the street scene.*

### 09/01064/ATC

**SUPPORT**

Willow Bank, Mill Lane

Fell No.2 Leylandii

### 09/01067/ATC

**OPPOSE**

Prebend House, Hunter Street

Fell No. 4 Ash and crown reduction of No. 2 Yews

*Members asked for Protection Orders to be sought for these trees, the Yews in particular, and noted that no reason was given for their removal.*

### 09/01106/APP

**SUPPORT**

Manor Farm House, Moreton Road

Single storey rear extension (amendment to 08/02061/APP)

## 218/09 Planning Control

Members noted the following planning decisions received

### Bucks. County Council

#### Approved:

09/20004/AWD Home Farm Waste transfer station for agricultural plastic recycling

Oppose

### Aylesbury Vale District Council

#### Approved:

09/00626/APP 2 Brackley Rd. Erection of 1½ storey rear extension Support

09/00655/AAD NFU, Brackley Rd. Non-illuminated front & side advert signs Support

09/00694/APP Manor Beeches Cott. Erection of replacement detached dwelling Support

09/00711/APP 11 Plover Close First floor extension Oppose

09/00763/ATP Buck. Primary School Works to trees Support

09/00803/ATC 32 Well Street Work to 2 holly trees Oppose & recommend TPO

09/00840/APP Little Oaks, Brackley Rd. Demol<sup>n</sup> & erect<sup>n</sup> det. garage+s/st. side extn. Support  
09/00899/APP 25 Highlands Road Single storey rear extension Support  
Members asked that if no explanatory letter re the decision on 09/00803 was received, reasons should be sought from the officer.

**ACTION THE CLERK**

**219/09 Reports to Development Control**

09/00711/APP 11 Plover Close First Floor Extension Oppose

*Referred from Full Council 29<sup>th</sup> June 2009:*

**220/09 Aylesbury Vale Advantage (AVA) Revenue Funding**

Members were asked to discuss and confirm the priority areas to be considered for potential projects for the £100,000 revenue funding available for Buckingham. Cllr. Newell had written suggesting BMX facilities in Bourton Park. Members felt this was a minor matter not appropriate for this funding and decided on the following, in order of importance:

1. Car parking - the existing problems were preventing growth – and cycle and pedestrian routes and other alternatives. It was suggested AVA could commission a third party to carry out a study and make recommendations that would encompass the town-wide parking issues and development of alternative means of access to the town centre.
2. Update the Vision and Design Statement and include a Green Agenda section; this would guide future growth and help preserve the Conservation Area.
3. Flood Management and Protection.

A Working group was agreed of Cllrs. Whyte, Smith, Stuchbury and Try with Cllr. Hirons as reserve.

**ACTION TOWN CLERK AND NAMED CLLRS.**

**221/09 Enforcement**

As no reply had been received the last letter to Mr. Dales (resulting from Min.127/09) would be copied to Mr. Cannell and action requested. The Committee agreed to expedite three cases: 21 Market Hill, 23 Castle Street and the Bull Ring Tea Rooms

**ACTION THE CLERK**

**222/09 Transport**

222.1 BCC draft document *Buckinghamshire Network Hierarchy – a Reference Document* (response date 24<sup>th</sup> July, i.e. before the next meeting.)

Cllr. Hirons undertook to review the document and circulate the Committee with his response.

**ACTION CLLR. HIRONS**

**223/09 Planning – other matters**

**223.1** To receive and discuss the Action Plan arising from the Buckingham Plan Stakeholder meeting held on Tuesday 9<sup>th</sup> June 2009

Members agreed that the document should be published on the website and circulated to stakeholders.

**ACTION THE CLERK, CLLR. TRY**

**223.2** To receive the report on *Policy on Planning Obligations for Education provision* and agree a response.

Members opposed the proposals, indicating that the County Council should bid for central government growth area infrastructure funding as other Authorities did. They felt that a 'roof tax' would inhibit development and inflate new house prices with a consequent effect

on the whole housing market. Concern was also expressed that developers would build in adjacent counties but rely on Buckingham for infrastructure services, with a deleterious effect on the town.

**ACTION THE CLERK**

**223.3** To receive the SE England Partnership Board *Formal submission of partial review to the South East RSS in relation to: Somewhere to live: Planning for Gypsies, Travellers and Travelling Showpeople in the South East* and to appoint a Councillor to report on the consultation document which accompanies it. (Response date 1<sup>st</sup> September 2009).

Cllr. Smith would prepare the report.

**ACTION CLLR. SMITH**

**223.4** North Bucks. Parishes Planning Consortium; to receive and discuss the following documents:

- a) Minutes of the Annual General Meeting, Chairman's Report & Membership List
- b) Minutes of the 23<sup>rd</sup> June 2009 ordinary meeting
- c) Response to SE Plan – Final Document

Members noted these documents.

**223.5** To receive the request for information from the Rural Services Network and agree a response (required by 10<sup>th</sup> July).

The Clerk would check with the CAB and make appropriate response.

**ACTION THE CLERK**

**223.6** To discuss whether to appoint Members of this Committee or the Town Clerk to represent the Council's views at Development Control meetings at AVDC or BCC as necessary.

Members agreed the Chairman, Vice Chairman or Committee Clerk, as available.

*Members and Clerk agreed to carry on past 10pm.*

## **224/09 Correspondence**

**224.1** 09/00417/APP 5 Catherine Ct. Reasons for AVDC decision contrary to BTC response

Members noted the reasons given, but did not agree with them.

**224.2** 09/00613/APP Land behind Station Terrace

- a) to receive a letter from Mrs. J. Paterson and accompanying report from the Design Officer
- b) (125/09) to receive a response re s106 monies for this site.

A letter of thanks would be sent to Mrs. Paterson.

Cllr. Hirons gave the Committee information on how s106 monies were decided upon; Sport and Leisure contributions would be the only sector the Town Council would be consulted on.

Members were unclear as to what fell within the definition – e.g. did it include green spaces in Town Council ownership like Railway Walk or the Cemetery?

It was felt that a Town Council policy needed to be agreed, and that the Town Council should be involved from the earliest opportunity in all discussions.

**JULY 27<sup>TH</sup> AGENDA**

## **225/09 News releases**

As indicated above:

1. Core Strategy response
2. Hallam Land response

A flyer would be prepared for the BTC display on July 19<sup>th</sup> Family Day directing people to the website for the latest news on various subjects.

**ACTION THE CLERK**

**226/09 Chairman's Items**

The developer of land behind Market Hill had requested that he be permitted to make a presentation to the Council. Members decided that Interim Council on the 27<sup>th</sup> July would be the most suitable occasion.

**ACTION THE CLERK**

**Date of the next meeting:** Monday 27<sup>th</sup> July 2009 following the Interim Council meeting.

Meeting closed at: 10.15pm

CHAIRMAN ..... DATE .....

**ATTACHMENT – MINUTE 213/09 CORE STRATEGY RESPONSE**

The comments following are based on specific paragraphs or policies to aid the response to AVDC using the formal response sheets. The Core Strategy is the main document in a vast suite of papers that make up the whole plan.

**Specific Comments for the submission****1.2 (page 3)**

The in and outward diagram shows commuting relating to the district and identifies in total that there are 33000 out commuters (based on eight-year old data). The volume to specified areas is 9266 short of this number (that is nearly as much as the three largest specified destinations). Obviously there will be some that are to more far-flung places but surely the commute to Northamptonshire (e.g. Brackley, Towcester and Northampton) will be the most significant?

Leaving this out means that the northern transport dimension is ignored & it leads to such suggestions as downgrading the A422 and A413. The diagram also misses out substantial employment centres such as Slough, Reading and the M4 corridor.

**AGREED****1.7 (page 13)**

This paragraph makes mention of poor air quality because of the inner ring road and that the inner ring road is a barrier for pedestrians & cyclists. No solution is proposed to this (like a proper bypass).

**AGREED****Table 1 (page 19)**

Aylesbury Town is shown as only taking 56% of the "Required LDF supply" (taking into account North East Vale figures as they are in CS1) yet the Regional Policy stated in the July 2007 consultation edition of the Core Strategy stated a requirement of 80% for Aylesbury. This is further confused by the figures in CS1 that claim Aylesbury will take 63%. The rest of district is to take 17% yet in table 1 it states 11.8%. Clarity is needed to understand the actual numbers and split being proposed.

**AGREED****CS1 (page 20)**

The inference in CS1 is that Buckingham would be forced to grow by 60% of 17% (1200 out of 2000) but this excludes the 2669 dwellings in the "rest of district" approved or deliverable – and some or most of these may be in Buckingham. Allowing the same 60% to this figure means that 1601 houses are built, approved or deemed deliverable in Buckingham. So what is the actual figure being proposed for Buckingham from the base date of 2006? Using the SEP figures, 60% of the quota is 2820 which is a far cry from the stated 1200 that results from the percentages quoted in CS1.

**AGREED**

*The following small notes support the comments in CS1, from a review of the Rural Settlement Hierarchy document.*

**ALL AGREED****4.4 (page 10)**

*The document suggests that Wendover should be excluded from the tier 2 towns due to a number of issues including congestion and parking problems – areas of concern in Buckingham already but not acknowledged.*

**5.4 (page 13)**

*Definition of "well served" in relation to public transport is needed as it is arguable that many parts of Buckingham are far from being well served – in evenings, weekends or to the right locations.*

**5.5 (page 13)**

*The Oxford – Cambridge bus route is quite handy for many residents, but as the only stop is on the edge of town outside the bypass, it is far from convenient for the majority of residents.*

**5.9 (page 13)**

*Fair assumptions of range of services in Buckingham, but does not acknowledge how some of them may be already at capacity, especially in light of recent reductions in the services at the community hospital, and the current economic challenges of market towns in general, and provision of financial services (i.e. no Saturday bank opening).*

**5.12 (page 14)**

*Bus times also need to take into account evening needs – i.e. to allow for return to/from work, or access to services outside the arbitrary 9 -11 am timeslot (no good for parents, shift workers, or the unemployed attempting to retrain or seek advice from Milton Keynes Job Centre Plus). Does not acknowledge out of hours school activities, access to the district theatre facilities, financial services, or to partake in democracy at district and county hall.*

**5.13 (page 14)**

*The 30 minute public transport time needs definition – does it allow for bus changes, walking to the stop etc.?*



**6.3 (page 18)**

Concern that the Strategic Housing Assessment is developer led, and leaves unanswered questions regarding sites with no declared intent, which in planning terms may provide better opportunities for place-making and social cohesion with existing settlements. Raises the question: is this plan a developer led plan?

**6.4 (page 18)**

Just because a site is being promoted and is for sale does not mean it is automatically suitable for development. i.e. Infrastructure deficiencies.

**6.12 (page 19)**

Asserts the 2000 dwelling minimum for “strategic sites” as in the Core Strategy, without any justification for this figure. One could argue that the figure should be variable, depending on the impact on the existing settlement.

**6.15 (page 20)**

The scenarios are just playing with numbers in various different proportions. When this issue of rest of district split was discussed with Forward Plans in 2008, the very same concerns were raised, and there is no attempt to provide evidence to the chosen proportions. There are no suggestions to how the relevant critical mass is achieved to unlock the “commensurate” infrastructure improvements. Without this analysis it is impossible to know if the tier 2 town could take 20, 40, 60 or even 80% new dwellings without some strategic work on impact assessment, infrastructure issues, and also taking into account the vicinity of the North East Vale new town north of Newton Longville, which is proposed to be the same size, if not bigger, than Buckingham and therefore could be argued as meriting Tier 2 status.

The need for infrastructure investment must be identified in the Core Strategy so that parallel strategies (e.g. transport, green infrastructure, education, etc.) can take into account the relevant proposed growth – and for the full proposed growth as in the SE Plan – and so not to inhibit sustainable development.

**6.16 (page 20)**

No justification is given as to why the additional new dwellings should be the percentage given as per the reasons above.

**Appendix 3 (page 26)**

Definition of hospital is needed due to the limited community based services in Buckingham (recently reduced further by removing the Minor Injuries Unit).

**Settlement Review Table**

There is an error regarding the bus route 66 (now 60) – there are not 16 buses a day. The quoted number of business units may not be accurate due to the recent increase of B1/B2/B8 industrial/warehouse units being used for A1 retail use and A3/A5 food use without appropriate planning approvals.

**Paragraph 2.5.4 (page 25)**

This relies on BCC LTP2 (2006), but this Council is well aware of the existing deficiencies in this transport plan for the north of the Vale, so it is incredible that it would be deemed suitable to refer to for a growth area. It is also worth noting that proposals in the SEP for the A421 and the importance of the M1/Milton Keynes to M40/Oxford east-west strategic link do not transfer into the LTP2, or any reference to growth. It is also indicative of the low level of concern re transport issues in the Vale as the Cross Boundary Policy Statements do not include reference to Northamptonshire or Milton Keynes (LTP2 appendix 6.4). **AGREED**

**2.5.20 (page 30)**

There is no mention of the need to pass thorough Aylesbury when commuting from the north of the county to the Thames Valley, Heathrow etc. The alternative (via the M40) adds 20 odd miles to the journey, and the proposed employment sites of Silverstone and Westcott will only exacerbate the existing congestion issues on top of the residential growth. LTP2 (2006) obviously does not deal with these new Core Strategy proposals. **AGREED**

**CS2 (page 31)**

Support the concept of Aylesbury being the focus of the majority of the district’s growth when infrastructure (power supply and water/sewerage capacity) permits. **AGREED**

**Diagram 2 (page 34)**

This diagram does not tally with the County Council proposals currently promoted by AVA – especially the transport links between the A413 north to the A41 via A418. **AGREED**

**Para 2.6.3 (page 35)**

No definition of “strategic site” here or in the glossary in respect of how it must only apply to sites of 2000 dwellings or more. We would contend that a strategic site is one that proportionally has a large impact on an existing settlement; for example 1000 houses added to a settlement of 5000 results in a 20% increase. But this policy excludes this as “strategic”. This then means that it is excluded from the Core Strategy and must wait for the future Allocated Sites document – which for key infrastructure issues covered in this Core Strategy will be too late. Worryingly, this is not detailed in the accompanying Spatial Strategy paper either so the assumption of a minimum 2000 to be strategic is without any evidence. Depending on how the SEP

dwelling numbers are translated into reality, 2820 houses is in fact the MINIMUM (as per Core Strategy proposal 5.2.2) being proposed for Buckingham. PPS12 does not impose a number to define 'strategic sites', but it does make the point that sites should be identified that are central to achieving the strategy. We would argue that the SEP dwelling numbers certainly show Buckingham as being central to the proposed Core.

**AGREED**

#### **2.6.6 (page 36)**

Disappointingly there is far less attention to the rural vision compared to the Aylesbury Vision, despite 60% of the population being located in the rural "rest of district" (as quoted page 2). Many sentiments of the Aylesbury Vision in para 2.5.7 are also applicable to the rural areas. Depth of vision for the rural areas needs to be at least as detailed, and in its current form is very much a diluted vision. Many elements from the BRAG plan could also be used to improve the vision, together with the Buckingham Plan and other parish plans.

There are many individually specified items in the Rest of District vision which do not have any meaningful planning response (e.g. affordable housing, healthcare, education provision, road safety, etc) and this is contrary to the intent in PPS12 paragraph 4.8 and 4.9 where infrastructure issues should be supported by evidence.

**AGREED**

#### **Para 2.6.12 (page 38)**

The BCC Aylesbury Vale Transport Strategy is fundamentally flawed – it has not been consulted on and has not been agreed by the county councillors at the time of incorporation into this Core Strategy. Residents and Town Councils have not been invited to take part in this transport strategy, and previously identified issues through Local Area Forums, the draft Sustainable Community Strategy and the Buckinghamshire Rural Affairs Group strategy have all been excluded. In addition the local Buckingham Plan is not referred to, and the regional SEP and subregional MKSM notes on the A421 improvements are underplayed, with no proposals for the plan period being identified.

LTP2 is well known locally to have avoided any forward planning issues and cannot be relied on to be relevant for the Core Strategy as it did not deal with a growth agenda. BCC are working on LTP3, which must be implemented by April 2011. This will, however, be too late to incorporate into the Core Strategy unless it is purely reactive to it – and that will omit many areas of current concern.

The Core Strategy ignores the BCC policy proposal to downgrade the A413 (the A422 downgrading is mentioned at the second bullet point, and this has no justification). The A413 is a critical link north, and the A422 east and north – especially in light of the proposed employment site of Silverstone mentioned just two paragraphs earlier in 2.6.10.

It is concerning that Buckingham, the only tier 2 town, deserves only a short paragraph on transport planning and this is indicative of how little attention has been put into considering the overall impact of the 60% of housing allocation to Buckingham. This is the same depth of vision given to the tier 3 settlements, and in effect demotes Buckingham to a tier 3 settlement.

**AGREED**

#### **CS3 b (page 39)**

The remote nature of the employment sites have not been considered at all in their accessibility to existing and proposed settlements (see our response to 2.6.12 for more details).

**AGREED**

#### **CS3 g (page 39)**

Relies on the BCC District Transport Strategy which has been already taken as fundamentally flawed – the response to 2.6.12 will also be incorporated into this item.

**AGREED**

#### **CS3 k (page 40)**

We welcome the identification and planned action to make provision for addressing flooding issues in Buckingham.

**AGREED**

#### **CS3 m (page 40)**

The Buckingham Plan (2008) and the Buckingham Vision and Design Statement (2001) provide evidence and strategies that need to be considered part of the Core Strategy and allocated sites (including social and physical infrastructure, Conservation Areas, brownfield sites, protection of future roads etc.), which have been ignored. We would draw attention to PPS12 paragraph 6.2.

**AGREED**

#### **CS3 n (page 40)**

We welcome the inclusion of SuDS and flood resilience measures in the policy, and would urge that "where required" is properly defined so that knock-on effects to existing settlements are fully considered, due to a long history of existing flooding and drainage issues in the Buckingham area.

**AGREED**

#### **2.6.19 (page 40, 13<sup>th</sup> point)**

Nowhere in Buckingham is within 30 minutes public transport time of a hospital. The Strategy seems to be under the incorrect assumption that Buckingham has a general hospital, but in fact this is only a local community hospital with few services, which recently were reduced even further when the Minor Injuries Unit was closed by the PCT. This false premise is also repeated in the Sustainability Appraisal (appendix 4 – testing matrices).

**AGREED**

### **2.7.6 (page 44)**

The list of services to be included for the North East Aylesbury Vale SDA, such as fire, ambulance, police, social care, etc., surely makes it another tier 2 town, along with Buckingham, in Aylesbury Vale, and it is noticeably excluded from the general tier 2 strategic issues. **AGREED**

### **Para 2.7.7 (page 44)**

Very disappointing that the issues of infrastructure are avoided for the MK extension/NE Vale growth area. Will have substantial impact on A421 and on county services provided in Buckingham and Winslow such as education, social care, transport etc. The current cross border issues of health care and bus provision highlight issues that are ignored by the Core Strategy, and are not addressed in the BCC LTP2 or the PCT strategy. Indeed the Buckinghamshire Walk-in Centre is located in High Wycombe, in excess of 2½ hours away by public transport, so is of no use to anyone north of Aylesbury. **AGREED**

### **Para 3.1.7 (page 51)**

Concerns that the district wide effects of the growth area are not being taken into account with lack of clear infrastructure requirements that tie in with the Core Strategy – especially gaps in the Silverstone to Buckingham/rest of district and the North East Vale/MK West extension to the rest of the district. **AGREED**

### **Para 3.2.3 (Page 56)**

The vision in this paragraph must make a statement about the surrounding hinterlands and the county as a whole needing to be able to access the existing and new facilities that are being proposed for the district and county as a whole. It is assumed this refers to Aylesbury town and its immediate rural area. That being the case, similar consideration should be given to tier 2 and 3 settlements. If that isn't the case, the vision should be expanded to include those settlements. **AGREED**

### **CS7 (page 59)**

No policy included here about linking and improving access to the rural areas and the rest of district. See notes above for para 3.2.3. **AGREED**

### **3.3.1 (page 62)**

Once again no mention of Northants in the Employment Strategy. Even if it is not of importance to Aylesbury and the south of the Vale it is much more important to the settlements in the north of the Vale. **AGREED**

### **Para 3.3.3 (page 62)**

The Employment Land Study was discredited during 2007 stakeholder forums with business, developer and community leaders as being incomplete and omitting many potentially key areas. **AGREED**

### **Para 3.3.8 (page 63)**

No mention of supporting start-ups and micro business, or any inclusion of live/work units and planning policies to assist in new ways of working to reduce commuting and encourage local entrepreneurial activity. There is also a lack of awareness of the need for sophisticated marketing: Milton Keynes is a huge draw for relocating business, and the district needs to be able to demonstrate why the Vale is a better location for new business by active marketing. **AGREED**

### **CS8 1 (page 69)**

There is no mention of how some town centre employment sites may well suit conversion to residential, and how such employment areas can be relocated - though this is hardly surprising given the concentration on large employment sites in the policy and the exclusion of mixed use and infill small scale employment property. **AGREED**

### **CS8 II (page 69)**

District-wide access to Westcott from the north and north east of the district is very poor. Silverstone has no existing infrastructure to allow expansion, and no existing transport links to support large scale employment that would benefit the Vale – Silverstone is currently well served by the Northants A43 and will no doubt provide a large number of jobs to Brackley and Towcester residents, and potentially draw away businesses from Buckingham and thereby encouraging more car commuting. This is a lamentable omission in conjunction with BCC's strategy proposal to downgrade the A413, and no there is no mention of the inadequacy of the Dadford Road, the main north-south route to Silverstone. There is no bus service to either site from the Buckingham area.

All proposed sites are for large employment areas – there is no mention of encouraging smaller concentrations, business start-up facilities or hatcheries etc. All proposals will therefore lead to additional commuting across an inadequately planned road network. **AGREED**

### **CS8 Table 3 (page 69)**

No employment allocations are proposed for Buckingham despite the second biggest proposed growth in housing. This will only lead to more commuting to Milton Keynes, Aylesbury and the new proposed sites of Silverstone and Westcott, harming the CO<sub>2</sub> targets, and increasing congestion.

The benefits of Buckingham being a university town are not taken into account in the employment strategy, and this represents a missed opportunity to develop the technology and academic centre of excellence Buckingham currently is. **AGREED**

### **3.3.31 (page 70)**

Floor space monitoring is too narrow a statistic to monitor true employment created. Emphasis should be on job creation not building empty warehouses. **AGREED**

### **3.3.32 (page 71)**

Average commuting time and distance should be key indicators of a successful and sustainable housing and employment strategy. **AGREED**

### **Para 4.1.3 (page 72)**

CO<sub>2</sub> claimed to be mainly from transport, which is certainly a factor with the existing commuting – but does not acknowledge the large proportion from the built environment, over-flying aircraft, manufacturing processes, waste incineration etc. **AGREED**

### **CS9 (page 73)**

A policy clause could be added here for the sites that drain into a flood prone area i.e. “a new development within the vicinity of a flood prone area or watercourse leading to one, must ensure that the water run off is at the same rate as existing or slower, to mitigate future flood events.” **AGREED**

### **CS11 II (Page 80)**

A district wide average leaves smaller towns and villages at risk of not receiving a fair proportion of affordable homes where they are needed. Affordable housing must be spread out around the district to satisfy real and identified needs (such as those by Buckinghamshire Community Action in their Exception Scheme research). **AGREED**

**CS11 IV.** Cllr. Hirons had suggested a cash payment option for developers. **NOT AGREED**

### **CS11 III d (page 80)**

An unfair clause for someone building a single dwelling or a small constrained urban site into a couple of apartments. **AGREED**

### **CS11 III c (page 80)**

The proposed policy could be restrictive on difficult and historic sites where developers are under pressure already to meet a wide range of obligations. **AGREED**

### **CS11 III e (page 80)**

No reasons are given for the lower target compared to the other areas in the district. We can see no justification for this, and maintain it should be the same as the district wide target. **AGREED**

### **CS12 III (page 86)**

It should be noted that the strategic green infrastructure strategy was developed without asking for or inviting parish or town council input, despite them being owners of substantial parts of the existing network of parks and other green spaces. **AGREED**

### **Para 5.1.11 (page 93)**

Disappointingly the BCC/AVDC infrastructure schedule was full of errors and inconsistencies and was prepared in the main before the SEP was finalised and agreed and does not clearly identify growth issues; it cannot therefore be relied on to provide an accurate picture of district-wide infrastructure requirements. The “validation process” did not include local consultation and excluded town/parish councils who provide various services such as allotments, cemeteries and parks.

### **Para 5.2.2 (page 95)**

No reasoning as to why the SEP house numbers should be treated as a **minimum**, and no maximum growth is actually specified which leaves towns and villages vulnerable to opportunistic developments during the entire life of this Core Strategy. This will also cause problems with other service providers when they update their strategies as they will not be able to plan in confidence.

### **Appendix 1 Glossary (page 106)**

Use of topic papers (not circulated with the main Core Strategy) inhibits understanding of the Strategy and leads to confusion and duplication of statistics, evidence and conclusions. There is inconsistency in the supporting documents as to their actual status, and what takes priority: Topic Paper, Supporting Evidence, Background Information. The circulation of these was patchy and the website links were not live during the first part of the consultation causing difficulties in reading the submission in the time available. The inclusion of draft supporting papers that have not been previously issued, and certainly haven't received public or even elected member comments cannot be a sound way to build an evidence base for a twenty year plan. Those papers that have been circulated and commented on before have not been revised or amended, and therefore include errors and missed opportunities.

### **Appendix 3 Plans & Strategies taken into account ... (page 110)**

Despite Buckingham Town Council having a number of joint meetings with AVDC and BCC during 2008, none of the topic papers were offered for information, and all observations, suggestions, and early findings from the Buckingham Plan have been ignored. There is no mention of the Buckingham Plan, or of BRAG's Rural Strategy, in the list which shows a lack of overall rural proofing as recommended by the Commission for Rural Communities and the Government Office of the South East Rural Forum.

#### **Appendix 4 Overview of Development at Aylesbury (page 125)**

Transport corridor between Aylesbury and Milton Keynes is understandable, as is Aylesbury to Watford/London/M25. No mention of transport corridors between the tier 2 town (Buckingham) and Aylesbury, or between Buckingham and Milton Keynes (despite the NE Vale/MK site and the proposed growth of Buckingham, and the new employment site at Silverstone).

#### **Appendix 5 Delivery Strategy (page 132)**

Some environmental assets will have a parish or town council as the lead agency – for example in Buckingham the Town Council owns and maintains the cemetery, some parks, etc.

#### **Appendix 5 Delivery Strategy (page 133)**

The section 106 discussion have to include parish and town council input – many local services are devolved to the local level and need support where any growth is proposed e.g. cemeteries, parks and playgrounds, community halls, etc.

#### **Sustainability Appraisal for the Proposed Submission Core Strategy Appendix 4 (May 2009)**

Page 14. The CS1 policy appraisal appears to be after cabinet debate. Did AVDC have this information prior to making a decision about the rest of district distribution? Definition of "good access" to services in tier 2 and 3 is without foundation (consider emergency and out of hours health services, job centre plus, vocational training, etc).

Page 15. Community identity is a critical and emotive issue and this justification glosses over the huge challenges for Buckingham with the proposed 60% share of the new dwellings. From the start of 2006 to the end of the plan period, this proposal is to increase the size of Buckingham by around 50% if one takes the SEP figures; not to mention the increase in size of surrounding villages and the new town at Newton Longville.

Page 15. Suggests that housing alone attracts business. Good communications, attractive locations with good infrastructure might also help.

Page 16. Health & equalities. Affordable housing has been identified as being in short supply in the area, but it must be remembered that increasing the proportion will have an impact on existing service delivery and support services, especially those needing care and social service assistance.

Page 17. Still ignores the lack of rural proofing for training or indeed any other of the preceding policies.

Page 17/18. Waste water issues in Buckingham identified as being an issue for deliverability.

Page 18. The strategy could identify key green infrastructure requirements. For example: Buckingham has been suggesting better river management and flood control, which could also lead to energy production and a district park (no country park in the entire district).

Page 19. Conclusions are very simplistic and do not mirror local knowledge or opinion. Agree that uncertainties are problematic, but the strategy could have resolved this by lowering the threshold for strategic sites needing to be 2000 dwellings or more. Highlights the low priority given to retaining historic agricultural features (e.g. hedges, trees, etc). Firmer guidance on the conservation areas and local design guides could be noted here for future preparation or updating (as is the situation in Buckingham).

Page 21. Economy - seems to ignore the lack of different business models and differing property requirements. No mention of live/work or start-ups.

Page 23. The strategic housing land availability assessment excludes land that may be of interest from a location point of view but needs preparation prior to development.

Page 25. Crime and safety is dismissed as no significant impact. Busier roads, more school journeys, busier town centres, etc. and lack of any mention of improving local police presence has surely got to lead to a potential problem, if only by increasing the fear.

Page 25 seems to assume that the hospital in Buckingham offers a wide range of devices to be deemed within 30 minutes and discounts the inaccessibility of some services, or the need for connections. Out of hours access is not discussed, and Wycombe walk-in centre is hardly handy.

Page 33 - the sustainability appraisal of transport is surprisingly short. With no strategy for Buckingham, it is not possible to determine if the quota of development is too much for the existing transport options or too little to bring new transport benefits.

Page 33 - energy could have included policy guidance on micro generation in conservation areas.

Page 35 acknowledges water supply and waste issues. No mention of gas, electricity or broadband capacity. The statement "there may also be flood risks arising out of development" shows that the policy does not take seriously the actual flood risk and the contribution that new areas will make by causing faster run-off.

Page 36 conveniently excludes the number of houses built of with permission since 2006 so the 1200 is not an accurate figure for the overall strategy to be planning for.