



BUCKINGHAM TOWN COUNCIL

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Town Clerk: Mr C. P. Wayman

Tuesday, 23 August 2016

Councillor,

You are summoned to an Extra-ordinary meeting of the Full Council of Buckingham Town Council to be held on **Tuesday 30th August 2016** at 7pm in in the Town Council Chamber, Cornwall's Meadow, Buckingham.

Mr C. P. Wayman
Town Clerk

Please note that the Extra-ordinary Full Council meeting will be preceded by Public Session lasting for a maximum of 15 minutes, in accordance with Standing Order 1.3.

AGENDA

1. Apologies for Absence

Members are asked to receive apologies from members.

2. Declarations of Interest

To receive declarations of any personal or prejudicial interest under consideration on this agenda in accordance with the Localism Act 2011 Sections 26-34 & Schedule 4.

3. VALP

To discuss and agree Buckingham Town Council's response to the Vale of Aylesbury Local Plan
Appendix A

To: All Councillors

Buckingham



Twinned with Mouvaux, France



Members are reminded to declare any prejudicial interest as soon as it becomes apparent

BUCKINGHAM TOWN COUNCIL RESPONSE TO VALE OF AYLESBURY LOCAL PLAN

VALP AND THE BUCKINGHAM NEIGHBOURHOOD DEVELOPMENT PLAN

This document compares the policies of the Buckingham Neighbourhood Development Plan (BNDP) made in October 2015, with those of the Draft Vale of Local Plan (VALP) which is in the process of being made.

Following changes in Government planning policy, the initial VALP was rejected at the public examination stage for not taking into account unmet housing and employment needs from neighbouring authorities.

At this time there is no VALP, and Buckinghamshire is currently expected to accommodate 33,000 new homes by 2033 (S2), all of which could be forced on the Vale of Aylesbury: 21,300 for AVDC's own need, with a further 12,000 from Wycombe and the Chilterns, which are constrained by their green belts and Area of Outstanding Natural Beauty. It also takes no account of unmet housing needs from neighbouring counties or unitary authorities.

This worst-case scenario of the 'dumping' of 12,000 houses from South Bucks is being strongly contested by AVDC, on the grounds of redundant green belt sites and also on density, both of which it believes could accommodate much of Wycombe and the Chilterns' 12,000 need.

1. BACKGROUND**INTRODUCTION**

1.1 p11

The last sentence should be altered as is currently too negative. Remove "or where it shouldn't" and replace with "which areas are protected".

Duty to Co-operate

1.10 p12

It is particularly unhelpful that no mention is made of co-operation with Milton Keynes, by far the greatest influence on the north of the county, much more so than Wycombe.

There is no critique of the unmet need, especially the low housing density proposed in the south, and an unwillingness to use some of their greenbelt (but use ours instead).

Housing

1.14 p12

There is no mention of student accommodation when there are two universities in the Vale. It is important that an evidence base is created around need and demand on the existing housing market by these universities.

Employment

1.15 p13

Recommended that information is included on Silverstone Enterprise Zone and the Silverstone Masterplan.

It seems to assume that all employment growth will be office & high-tech. Given the need for a mixture of jobs some will be lower density warehousing.

Infrastructure

1.17 p13

It is unclear about the timetable for the production of the IDP and it should be made clear the implications for Parishes and the benefit to local communities through CiL and money going direct to Town and Parish Councils (with more if there is a Neighbourhood Plan in place).

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This section goes on to say that the housing market area includes Chiltern & Wycombe yet there are no proposals for improving the bad communications between the north & south of the County.

There is also no mention of health facilities.

Neighbourhood Plans

1.27 p15

Buckingham Town Council will have to modify & consult a revised BNDP within 12 months.

PROFILE OF AYLESBURY VALE DISTRICT

Places

1.36 p16

There is no sense of trying to fit Milton Keynes into the plan.

Additionally, there is no information about the large developments at settlements planned in neighbouring authorities at Silverstone, Brackley and Bicester. This growth needs to be taken into account as it affects communities in the north of the District. We would have expected that Luton, Dunstable & Leighton Buzzard would also impact on the Vale.

Population

1.38 p16

The Town Council would have liked to have seen projections by place or area inside the Vale.

1.39 p16

The Town Council has misgivings over the housing numbers needed for the Vale. Both in unmet need from other southern authorities but also from the figures produced in the CBHEDA. This is due to the population figures used. The population as stated in 1.39 is to increase to 214,000 in 2033; a rise of 22% over the time period. However this dismissed recent population trends as abnormal due to the recession and the period of austerity. With the current political-social-economic position (including the unknown consequences of leaving the EU) of the country with the period of austerity as defined by central government lasting for at the very least the first seven years of the plan, coupled with the low amount of employment land demanded from the plan (reducing the opportunity of the Vale to be a destination for inward migration for economic employment) then a much more comparable figure for population increase should be based on the census data from 2001 to 2011. This resulted in roughly 0.5% increase year on year. This due to the similar period of social economic position as we are currently in but also taking the majority of the period as good economic growth nationally. This would give the population in 2033 as 194,000 a much more realistic figure.

With this revised figure (based on information provided in paras 1.38, 1.39 and 1.49) a housing increase of 17,000 is reasonable, before including unmet need from other authorities.

Economy & Employment

1.44 p17

If 1/3 of employees commute out then we cannot see how this represents a sustainable economy. There is no plan to radically increase jobs in Aylesbury Vale to enable existing employees to work nearer to their homes and thus have a more sustainable lifestyle.

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1.47 p17 Certainly in the north of the Vale education is a significant employer. Apart from the normal schools there is the University of Buckingham and some large private schools (Stowe, Thornton College, Beachborough, Swanbourne, Akeley Wood & other preparatory schools).

Homes

1.50 p17 Affordability is a real problem but no real solution is proposed, nor to the lack of social housing tenancies.

Transport

1.57 p18 This paragraph needs reworking as it gives the wrong impression that Buckingham has good access to the A43 when the link to that road is extremely poor and nowhere near "reasonable".

1.59 p18 There is no mention of Milton Keynes or Bletchley rail connections, which is the preferred choice for most travellers in the north of the Vale.

1.61 p18 It should be included, as the importance of Milton Keynes is mentioned elsewhere, that Buckingham, because of the Oxford to Cambridge link, has good links (via 2 express services) to Milton Keynes.

2. VISION AND STRATEGIC OBJECTIVES

SPATIAL VISION

2.4b p21 It states that new housing will be at sustainable locations. However, as much of the housing demand is for districts to the south of this District, sustainable development should be near the south, as there are no good links from the north to the south of the district.

2.4d p21 The introduction highlights both the A421 expressway and Silverstone. However, the strategic links needed are omitted here and should be included.

2.4g p22 The Town Council sees no reason why all these factors should not be applied to Buckingham (the tourist destinations for Buckingham would be Silverstone, Stowe and Claydon House).

2.4h (6) p23 Typo, remove "a".

The active link from Buckingham to Winslow rail station is just a cycle path, which is hardly a major infrastructure project, and of use to few people. Also, there is no mention of links to Silverstone and the A421 Expressway.

STRATEGIC OBJECTIVES

2.6 (2) p24 There is no discussion on what constitutes 'reasonable and sustainable' unmet needs from other areas. In particular housing site analysis, housing density and transport links should be considered.

2.6. (7(1)) The point on development in the functional floodplain is to be welcomed. However, there is no definition of 'functional floodplain'.

3. STRATEGIC

SUSTAINABLE STRATEGY FOR GROWTH AND ITS DISTRIBUTION

Sustainable development for Aylesbury Vale

S1 p27 There is no reference to Neighbourhood Plans.

S1b p27 Buckingham Town Council would strongly support developments which offer a mix of uses, especially employment with housing.

Housing & economic needs

3.10 p29 The report writers may have felt that the area including the remainder of Bucks is a strategic housing market area but it makes no sense to Milton Keynes Council, nor to Buckingham Town Council. This should be reassessed.

3.15 p30 Since the Aylesbury area includes some surrounding villages, Buckingham should also include Maids Moreton, Gawcott etc.

3.16 p30 No evidence is provided to show that this is appropriate sustainable development for each settlement.

Spatial strategy for growth

S2 p30 Led by neighbourhood planning, *"Buckingham will accommodate housing growth of 50%, growth which will enhance the town centre and its function as a market town. Provision of new homes will support sustainable economic growth in the north of the district."* Based on the current Buckingham figure of circa 5100 dwellings, this would require a further 2571 homes. After current commitments and completions, this would leave a residual requirement of 557 homes. BNDP policies HP1 and HP2 provides for 617 new dwellings plus 400 student rooms by 2031. VALP's proposal would add the further 557 dwellings to these.

Additionally 50% is an arbitrary figure. There is no work produced that this figure is suitable for sustainable development. What if 60% is a sustainable amount in one place and 40% in another? The figures for f to j also appear to be arbitrary or based solely on figures given to the District Council. Why not a larger extension to Milton Keynes? Would a new settlement of 10,000 be more sustainable? It appears to have been missed by AVDC but each individual community has individual needs and demands and shouldn't be given an arbitrary number.

Also why when housing numbers have increased considerably will the Vale be providing less employment? Buckingham is expected to take 50% growth but there is no mention of additional jobs or facilities, despite being insisted on in the Sustainable Development strategy.

Furthermore, there is no reason Wendover cannot increase by 50%. It may not be able to do it in a compact way however, it can add further housing traveling back towards Aylesbury and create a liner settlement.

5 year housing land supply

3.18 p33 It seems that a reduced build rate in the first 5 years is necessary to get to a five year housing land supply.

SETTLEMENT HIERARCHY AND COHESIVE DEVELOPMENT

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- 3.25 p35 Typo, please remove "7".
- Table 3 p36 Should a larger emphasis be on villages that are on major routes and or closer to larger settlements?
- Table 3 p37 What happens to excess figures e.g. currently Maids Moreton has an application for 130 homes but has a demand for only 74.
- Additionally, does Calvert Green's designation change now it has a shop?
- P39 For these two settlement designations it is quite worrying that the District has two classifications which house unsustainable communities. What work is the District doing to address these and what work will be done in the future to turn these failing communities around?
- 3.26/3.27 & S3b p40 This contradicts the narrative around and also policy S2. S2 shows that larger settlements are more sustainable (hence the larger % home increase) then these two paragraphs plus policy S3d contradict this by preventing larger overall settlements in the District. It is also redundant as this policy has failed in previous plans to prevent this type of growth.
- S3 p40 Last sentence is redundant as already within the policy.
- In addition nothing is included in the policy in relation to para 3.29 therefore that paragraph should be removed or incorporated.

GREEN BELT

- 3.36 p41 Buckingham Town Council could support the revision to the Green Belt around Wendover.

INFRASTRUCTURE

- 3.43 p44 There is no tie between the infrastructure and employment.
- 3.44 p44 There is no mention of any North/South links
- 3.49 – 3.52 p44/45 The water supply situation is very vague and does not give firm plans to ensure that sufficient supplies are provided.
- S5 p45 It is very concerning that great emphasis is placed, via CIL etc. on developers funding infrastructure improvements. Unfortunately this conflicts with the desperate need for affordable housing.

PROTECTED TRANSPORT SCHEMES

- 3.64 p48 Whilst the BNDP does not specifically address future transport needs, apart from mentioning the new Buckingham/Winslow cycleway and the east-west rail link at Winslow, it is noted that VALP includes the upgrading of the A421 to Expressway status linking the M40 and M1, *"running across the northern part of Aylesbury Vale, bypassing Tingewick and Buckingham"*. It adds that *"Route options are still being investigated,"* then states somewhat ambiguously *"it is unlikely that anything will be available before autumn 2016."*
- S6 p48 A huge weakness is that the effect of developments near to the Vale border

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are ignored e.g. the traffic generated by Milton Keynes & Bicester.

S6a p48 There are no ideas as to how this move to sustainable transport is to be achieved with no plans for major employment or retail developments to both cover new housing and existing population.

S6c p48 Buckingham Town Council would strongly support the East/West Expressway as the only project that is likely to influence Buckingham.

GYPSY, TRAVELLER AND TRAVELLING SHOWPEOPLE PROVISION

S7 p52 The proposals do not seem to impact Buckingham.

DELIVERING THROUGH NEIGHBOURHOOD PLANNING

P54 This makes an incorrect assertion. Therefore "adhere" should be removed and the correct term "in general conformity should be used."

VALP states that Neighbour Development Plans provide communities with a mechanism to have a say in location and specification of new development. *"Made NDPs will not replace the Local Plan, but they will sit alongside it with their non-strategic policies applying ahead of similar policies in the Local Plan. AVDC will work with local communities to deliver growth through NDPs, and good communications will be essential."* *"But the risks of made NDPs have been highlighted: it could mean that a higher amount of development is now required, if this is the case, then it may be that the local community wish to review their NDP to be in line with growth in VALP, rather than have VALP allocate the additional growth."* With the delay in the new Local Plan, a decision was taken to base the housing numbers within the BNDP using the DCLG 2012-based household projections, which were higher than the figures being used to prepare the VALP. Despite a significant inherent resistance, Buckingham will accept a fair and needs-targeted amount of new residential growth.

Buckingham Town Council would also stress not only the undertaking given by planning manager Peter Williams at the Vale Presentation to Towns and Parishes on 13th July 2016: *"We will respect Neighbourhood Plans and make no changes to their allocations or policies"*, but that also given by AVDC Cabinet Member for Planning Cllr Carole Paternoster to Buckingham's Town Clerk on 11th August 2015: *"I can confirm that I support Neighbourhood Plans 101%."*

S9 p55 The plan basically suggests that the VALP should overrule the BNDP on housing but not on other issues. The Town Council do not think that AVDC's assertion on this is necessarily the Law.

4. STRATEGIC DELIVERY

AYLESBURY – DELIVERY OF A GARDEN TOWN

D1 p64 This does not concern Buckingham, except it does not include a bypass that would expedite North/South communications.

DELIVERING A NEW SETTLEMENT

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D2 p68 As there is no site and no policy it is difficult to comment. However, it seems a sensible alternative rather than continually trying to stretch the facilities in existing settlements.

SITES ADJACENT TO MILTON KEYNES

4.50 p70 Insert "ing" at the end of follow.

4.50 p70 3rd point This restriction to ensure that Newton Longville and Whaddon are retained as separate communities could be viewed as unnecessarily restricting development when historically with Milton Keynes such settlements have been subsumed into the larger settlement. With the development amount advocated by AVDC it is obvious that both villages will at some point in the (relatively near) future become integrated into Milton Keynes and that this paragraph combined with the first bullet point of policy D3b should be removed due to the reasons outlined.

D3 p71 As these areas are, to all purposes, part of Milton Keynes, surely it would make sense to transfer these areas to Milton Keynes. Milton Keynes will have to provide all services anyway.

DELIVERING THE ALLOCATED SITES

Role of the Housing and Economic Development Land Availability Assessment (HELAA)

4.56 p72 This paragraph must be altered. It highlights that the work behind AVDC is arbitrary and that no thought has gone into the housing number distribution. It shows that the District knows that the number of dwellings allocated to the smaller settlements is insufficient as it is not going to pursue looking at other sites outside the HELAA. Furthermore these unmet numbers won't be met by other such settlements and no indication is given on how much this shortfall in numbers will be.

It also states the different constraints and individually of settlements, but only mentions them in terms of restricting development, whereas some settlements would be able to take greater numbers than currently planned.

P74 No Table numbers, please insert.

The HELAA maps at the end of the document do not take into account all sites which were considered in the Neighbourhood Plan. Nearly all of which were more suitable through the approved SA than BUC043 and BUC046. In addition BUC051 is included in the map but is already allocated in the BNDP.

D4 p76 Please see points made above.

Delivering the allocated sites – at larger villages

4.65 p78 Please see arguments above about arbitrary figures.

4.70 p82 It could be argued that as there are suitable sites for larger villages that are in District's own words "suitable" but are not included due to numbers already being met that it is restricting sustainable development when the District as a whole is short of suitable land based on AVDC's housing numbers.

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D5 p83 This does not impact on Buckingham

For clarity it should be added that Neighbourhood Plans are allowed to plan and, if they so wish, allocate sites for a number of dwellings greater than that planned for under a local plan.

4.75 p84 Please see arguments above about arbitrary figures

Delivering the allocated sites – at medium villages

4.78 p84 As Buckingham and Maids Moreton have coalesced is there a reason the two figures have not been combined as per the reasoning given for Aylesbury and villages there. This would be due to the number and scale of current application within Maids Moreton.

D6 p90 62 houses for Gawcott of which 31 still need sites. As far as the VALP is concerned Maids Moreton should have 67 houses but they say only 21 have been allocated. This is difficult to believe as there have been many more which have already reached application stage. Developments at both these, together with Tingewick & Padbury, will rely mainly on Buckingham for their services which should be considered in infrastructure plans.

Items 1 – 6 seem sensible rules for development that could be supported.

Delivering sites at smaller villages

D7 p96 Please see argument above relating to planning under Neighbourhood Plans.

ASSESSING PROPOSALS AT OTHER SETTLEMENTS

D8 p97 Please see argument above relating to planning under Neighbourhood Plans.

PROVISION OF NEW EMPLOYMENT LAND

4.95 P98 This cannot be supported as it ignores the existing situation where 1/3 of employees commute out of the area, leave alone the existing commuting inside the area. So job growth, to give a truly sustainable policy, should be greater than housing numbers.

D9 p99 In relation to the policy and the basis behind it, it is unclear if the unmet need for housing and the subsequent population increase related to it has been factored in to the employment land need.

It is also unclear what the position is in relation to the employment allocations of Neighbourhood Plans and if any employment land will be re-designated as a result of the expanded growth at strategic settlements or the new settlement. Also, there is no factor relating to existing demand. In Buckingham there is a need for new employment land due to insufficient suitable existing facilities.

TOWN, VILLAGE AND LOCAL CENTRES TO SUPPORT NEW AND EXISTING COMMUNITIES

4.102 p100 This indicates that D9 covers Aylesbury Town Centre but it has no specifics around the Town Centre.

4.103 p100 VALP sees Buckingham as the hub for regeneration of the north part of Aylesbury Vale. It is gratifying to note that the VALP recognises our forward-

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thinking – our policies 4.7 and 4.8 regarding retail and leisure, together with 6.1 and 6.2 regarding the expansion of the University, address this.

D10 p102

There is very little further information especially in relation to the new settlement.

The policies in this area are laudable but it all assumes that development proposals will emerge. However, there is no policy for encouraging their emergence.

POLICIES FOR AYLESBURY TOWN CENTRE.

D11, 12 & 13

There are 37 paragraphs covering Aylesbury Town Centre, but nothing on Buckingham (or Winslow or Haddenham for that matter). It would have been good to have had an acknowledgement of the BNDP and perhaps a summary of the main policies.

5. HOUSING

AFFORDABLE HOUSING ON OPEN MARKET SITES

Affordable Housing

H1 p114

Proposes 31% affordable homes on a (new) site containing 11 or more dwellings. BNDP (Policy HP5) currently requires 35% affordable homes on sites for 25 or more dwellings, or sites of 1 hectare or more, albeit subject to viability. There is no conflict with VALP on the housing mix.

Rural exception sites

H2 p115

Nothing to conflict with BNDP.

Rural workers' dwellings

H3 p120

Nothing to conflict with BNDP.

Replacement dwelling in the countryside

H4 p122

Nothing to conflict with BNDP.

Self/custom build housing

H5 p123

VALP proposes a percentage be allocated on all larger developments, but without (at this stage) defining what is meant by "larger". BNDP Policy HP5 supports this in principle but on one site only (site H adjacent to Field Farm on the Tingewick Road), and excludes self-build from affordable housing requirements).

Also, there is no quoted threshold of development size for offering self build plots.

Housing for older people

5.60/1 p124

There are also no numbers for the various types of dwellings that will be required.

Housing Mix

H6 p126

Nothing to conflict with BNDP (Policy HP4).

Dwelling sizes

H7 p127

Nothing to conflict with BNDP (Policy HP4).

OTHER COMMENTS **Student accommodation** – no mention is made of this despite the likelihood of large student numbers at Aylesbury College (and to a lesser extent, given that it is a secondary/further education establishment catering for 14 to 19 year olds) Silverstone UTC. There are, however, growing numbers of students planned by Buckingham University, and BNDP Policy HP2 provides for 300 rooms at the Inov8 site, and 100 rooms at Verney Park, linked with BNDP Policy EE8 (land allocated to University of Buckingham expansion). VALP does not differentiate between housing and student accommodation, and perhaps it should.

6. ECONOMY

EMPLOYMENT

Protection of key employment sites

6.6 p129

The Aylesbury Vale Employment Land Review of 2012 identified 16 key employment sites in the district, including B1, B2 and B8 and other employment sites. Three of them – at Silverstone, Westcott Venture Park and Wendover Woodlands - have been given proposed 'Enterprise Zone' status. Buckingham Industrial Park is another of the 10 key sites, along with Network 421 at Gawcott.

Our policies EE1 and EE2 have already earmarked additional land for employment over and above VALP's requirement, in particular Site Q* on the southern side of Buckingham Industrial Park. *"This employment site should be aimed at the high-quality jobs principally in office/business use and in hi-tech office/industrial use, which would complement the developments taking place at Silverstone. Uses other than B8 (storage or distribution) will be preferred."* This once again demonstrates the BNDP's forward-thinking.

(* Site Q is the one which AVDC planning manager Peter Williams believes to have been withdrawn, although is clearly shown in the made BNDP approved by his own council).

E1 p130

VALP envisages 12 key employment sites, including three adjacent to Buckingham – Buckingham Industrial Park, Silverstone Circuit, and Network 421 at Gawcott.

Other employment sites

E2 p131

VALP seems content to permit the redevelopment of all other (i.e. non-"key") employment sites (albeit with a number of caveats). It also identifies (para 6.7) the importance of Aylesbury town centre and Stoke Mandeville Hospital, but identifies no other "sub-key" sites in the Vale. What about the other towns?

Apart from supporting redevelopment of "non-key" employment sites, the draft Policy paradoxically identifies a need for an extra 22 hectares of new employment land, but fails to identify where these are to be located. Presumably, the most favoured location(s) will be in the vicinity of the larger development(s) and/or near suitable transport links. This needs to be clarified.

Provision of complementary facilities for employees

E3 p132 Nothing to conflict with BNDP (and should be supported!)

Working at home

E4 p133 Nothing to conflict with BNDP but perhaps stating that the draft Policy will only be realised if super-fast broadband can be guaranteed.

Development outside town centres

E5 p134 Nothing to conflict with BNDP (providing AVDC adhere to the policy)

Shop and business frontages

E6 p136 Nothing to conflict with BNDP, mainly because it refers only to Aylesbury. The draft Policy itself is acceptable, but the entire section (paras 6.17 to 6.19) needs expanding to embrace all the towns in the Vale.

OTHER COMMENTS **Employment opportunities** - this whole section omits any reference to attracting employers to come to the Vale, or to remain there. It may be worth suggesting that this be included (i.e. start-up grants, business rate subsidies, housing allowances, encouraging support functions for existing high-tech firms, etc.).

TOURISM DEVELOPMENT

E7 & E8 p138-140 VALP states that tourism development will be encouraged by AVDC, particularly where respecting the character and appearance of the location, while E8 states that proposals for hotels and guesthouses will be supported provided that larger developments are located within town centres.

The NDP already underlines the importance of Buckingham's conservation area and character with its 200 listed buildings, the Old Gaol, the Parish Church and University, and its riverside walks and their expansion, as well as its largely independent retail outlets, pubs and restaurants. It actively supports sympathetic planning applications where they enhance this character.

Policies 9.8 and 9.9 add that *"key to Buckingham having a vibrant town centre is ensuring that there is a mixture of uses, and that people are encouraged to come into town. By allowing not just retail but other uses in the town centre, it is hoped to attract residents and visitors, and to ensure that it thrives."*

Additionally, the draft Policy refers only to new tourism developments, and fails to recognise existing tourist attractions. The Town Council's view is that the whole section (paras 6.20 to 6.25) should be re-drafted to embrace the importance of the visitor economy, and be expanded to include the promotion and preservation of the existing tourist offer. It might perhaps also mention that a full range of advice for tourists can be provided in Buckingham via the only Tourist Information Centre remaining in the Vale.

Tourist accommodation

E8 p140 Nothing to conflict with BNDP.

Agricultural development

E9 p142 Nothing to conflict with BNDP.

7. TRANSPORT

Vehicle parking

T1 p144

Nothing to conflict with BNDP (the parking etc. space standards quoted are optimum, and will only be achievable on new developments). But the draft Policy makes no mention of improving existing car park provision, particularly in town centres, anywhere in the Vale - unlike BNDP Policy EE5. Given that Aylesbury is being considerably redeveloped and expanded, it may be safe to assume that adequate car parking will be allocated in the process. The draft Policy might usefully be expanded (para 7.1 to 7.5 and the draft Policy itself) to reflect the growing needs for increased car parking elsewhere in the Vale. It might also incorporate mention of disabled parking, as per BNDP Policy EE5.

Footpaths and cycle routes

T2 p150

Nothing to conflict with BNDP, but could be strengthened to include provision of adequate access for the less able (as per BNDP Policy I1).

Electric vehicle infrastructure

T3 p151

Applicable to new developments only (i.e. no suggestion of retrospective provision to existing car parks), this is broadly in accordance with BNDP Policy EE5.

OTHER COMMENTS Transport infrastructure – surprisingly, other than in draft Policy S6 (Protected transport schemes, including paras 3.55 to 3.64), I could find no reference to the need for additional road or public transport routes. It seems that these are to be left wholly in the hands of Buckinghamshire County Council, Highways England and the various rail franchises. This, in my view, is a serious omission, particularly given the huge numbers of additional private cars that the 30,000+ new homes will inevitably generate.

Vehicle parking – VALP acknowledges that car parking has an impact on the environment (7.1) and that it remains a significant issue for home buyers (7.2), accepting that *“while public transport and access by walking and cycling may be easy in Aylesbury, the same does not apply across the remainder of the district.”* It also acknowledges that most residents use garages where supplied for domestic rather than vehicle storage.

It suggests new residential development optimum parking standards (T1), for instance 2.5 car spaces and two cycle spaces for a three-bedroomed house, noting that because of the increase of vehicle sizes, allocated spaces should be increased to 5x2.8m. It also suggests 1 electric car charging point for every 10 dwellings on a new development.

Regarding town centre and retail/industrial estate parking, it lays out minimum requirements for parking at new retail developments related to space per area, from 1 parking space per 37sq m at food retailers, to up to 1 space per 90 sq. m at DIY or garden centres. It also mandates electric vehicle charging points at the rate of 1 per 25 parking spaces (plus 1 per petrol station), both for new and existing parking sites.

Regarding town centre parking, Policy EE5 has pre-empted the need for more, identifying two sites for additional town centre car parking for visitors to the town to access these amenities. *“Parking standards in the*

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Buckinghamshire Countywide Planning Guidance will be met or exceeded”, and the BNDP already suggests electric charging points for new car parks.

11. DETAILED INFRASTRUCTURE

GREEN INFRASTRUCTURE

11.3/4 Shouldn't Whaddon Chase be made either Green Belt or an AONB?

FLOODING

P199-202

VALP comprehensively covers the flood risk in the Vale, working with the Environment Agency and underlining the need for Sequential Tests as laid out in the latest Strategic Flood Risk Assessments on all development proposals, *“other than sites allocated in the VALP”*, and the design and use of Sustainable Urban Drainage Systems (SuDS) on all planning applications. The BNDP at 2.47 notes that Buckingham is at risk with the River Great Ouse flowing through the town, and in its design, heritage and environment comments on Page 21 notes the need to prevent surface water flooding through design. Buckingham Town Councillors are proactive in raising flooding and surface water drainage issues when considering planning applications, making use of their local knowledge.

BNDP Policy 14 adds: “Development is not permitted in Flood Zones 2 or 3 unless unless the conditions set out within the National Planning Framework (NPPF) and the NPPF Planning Practice Guidance are met.” This includes, since 6th April 2015, the NPPF order that it is now compulsory “for local planning policies and decisions on planning applications, which relate to major development, to ensure that Sustainable Drainage Systems for the management of runoff are put in place”. Developers also have an obligation to consult with their Lead Local Flood Authority.

12. APPENDIX A

POTENTIAL SITES TO BE ALLOCATED

P206/207

VALP Page 206 identifies five potential sites to be allocated for residential development in Buckingham, totalling 1212 dwellings. These are at:
BUC003 Roxwell Morton Road (14 dwellings)

BUC025 Land south of the A421 (360 dwellings)

BUC043 Land west of Maids Moreton Road (Phase 3 – 130 dwellings)

BUC046 Land off Osier Way (420 dwellings)

BUC051 Land west of Buckingham, bound by Tingewick Rd, A421, Radclive Road and Brackley Road (288 dwellings). *(Although listed as ‘potential’ on Page 207, this three-block site is shown on the AVDC map (Page 9) as ‘committed’.)*

Buckingham prepared its NDP over a four-year period and at a cost of £80,000 for the following reason (1.11): *“The Plan is the first opportunity for the Town Council with the people of Buckingham to decide where new development should take place and how they would like to see the town grow and develop. Previous plans have been compiled by AVDC, and*

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without the Plan AVDC would continue to allocate where development should take place.”

BUC003 Roxwell is the subject of planning application 15/04106 (for 13 houses) which BTC decided on April 25 2016 to oppose and attend as it exceeded the 10-house maximum for a brownfield site in accordance with the BNDP. *Current status unknown.*

BUC043 is Maids Moreton Road Phase 3, which the Minister called in and is now the subject of a planning enquiry.

HOUSING & ECONOMIC DEVELOPMENT LAND AVAILABILITY ASSESSMENT (HELAA)

The final HELAA draft contains (at pages 118 to 135) a total of 68 sites in Buckingham having been considered for future development. Of these, 42 are considered unsuitable, leaving 26 sites allocated for either housing or economic development (12 for housing only, 9 for employment only, and 5 mixed). These are detailed in the Table below:

HOUSING NUMBERS

From the Table, it will be noted that:

- 1 Some sites allocated in the draft VALP have already been developed, or are under development. Additional “new” housing will therefore be less than the total shown;
- 2 Nevertheless, the housing numbers proposed by the draft VALP far outweigh BNDP expectations. Whereas the BNDP allocates land for 617 new dwellings (plus a reserve for 300 dwellings), the draft VALP anticipates 2,376 new homes – an increase of over 60%. Even including the additional 400 student rooms that BNDP allows for in addition to new dwellings, and ignoring that they would thereby release dwellings for residential, rather than student, use, Buckingham is expected to absorb well over 50% more “accommodation units” than anticipated in BNDP;
- 3 In particular, site BUC051 proposes a huge estate of nearly 300 additional houses extending unbroken from north of BNDP site H (Tingewick Road) to the Brackley Road, and east into a great swathe of Radclive. In view of the traffic infrastructure implications for Buckingham town centre alone, this should be resisted.

EMPLOYMENT PROVISION

The HELAA raises few concerns about draft VALP employment provision; although it is perhaps worth noting that completed developments at the Royal Latin School and outstanding development of the London Road Tesco site are included in the Table.

AVDC Ref	Location	Housing Capacity	Econ Dev (Sq Mtrs)
BUC001	North of AVDLP allocation at Moreton Road	80	0
BUC003	Roxwell, Moreton Road	14	0
BUC005	(Former) Police Station and land adjacent to 38 Moreton Road	13	0
BUC019	Land between Tesco and Wipac, east of A413	0	500
BUC020	Adjacent to Windsor Park (<i>sic</i>) and Buckingham Industrial Estate (BNDP site Q)	0	50,000
BUC024	Adjacent to Swan Business park	0	500

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BUC025	South of A421	360	1,000
BUC027	Station Road	6	0
BUC028	Off Tingewick Road (BNDP site G)	400	0
BUC029	North of Tingewick Road (BNDP site H)	50	0
BUC030	Tingewick Road Industrial Estate (east)	85	0
BUC032	Lucas Assembly and Test Systems, Tingewick Road	0	3,325
BUC039	Wharf Yard, Stratford Road (BNDP Policy EE2 - allocation for retail, office and mixed development)	0	500
BUC040	Market Hill and West Street (BNDP Policy EE2 - allocation for retail, office and mixed development)	62	2,500
BUC024	Delivery Office (actually Sorting Office/Telephone Exchange), Market Hill (BNDP Policy EE2 - allocation for retail, office and mixed development)	0	500
BUC043	West of AVDLP allocation BU.1, Moreton Road	130	0
BUC045	Off London Road (suitable for employment (B1) or retail)	0	11,349
BUC046	Off Osier way, south off A421 and east of Gawcott Road	420	3,000
BUC051	West Buckingham, between Tingewick Road, A421, Radclive Road and Brackley Road	288	0
BUC052	Tingewick Road Industrial Estate	100	4,400
BUC059	North of St Rumbold's Well and south of railway line (BNDP site J)	39	0
BUC060	South of A421 and east of A413 London Road	299	10,660
BUC061	Bridge Street (2 dwellings to be delivered, plus 129 square metre café, and 87 square metre retail which is under HELAA minimum threshold (<i>outstanding for Candleford Court site</i>))	2	0
BUC062	London Road Tesco	0	2,490
BUC063	Royal Latin School	0	2,150
BUC064	Between Bridge Street and Well Street (BNDP site K)	28	0
TOTALS		2,376	91,874

Unlike some more specific parts of the plan, some of these items are more commentaries rather than leading to specific policies:

- MK comments that the HEDNA doesn't refer to the impact of the MK HMA on the Vale.
- Luton says that its needs have not been considered.
- No other organisation seems to understand the calculation of the 10,000 unmet need.
- No comment is made on the impact of the planned 10,000 houses at Bicester, almost on the boundary of the Vale.
- There is little mention of Silverstone and the huge importance of the motorsport economy in this area (most of which goes to surrounding Districts perhaps due to the apathy of AVDC as illustrated here). It is also a huge leisure destination.