



Buckingham Town Council

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Town Clerk: Claire Molyneux

INTERIM
FULL COUNCIL

Wednesday, 12 August 2026

Councillor,

You are summoned to an Interim meeting of the Full Council of Buckingham Town Council to be held on Monday 17th August 2026 at 7pm in the Council Chamber, Cornwalls Meadow, Buckingham.

Please note that the meeting will be preceded by a Public Session in accordance with Standing Orders 3.e, 3.f, and 3.g, which will last for a maximum of 15 minutes. A member of the public shall not speak for more than 3 minutes. Members of the public can attend the meeting in person. If you would like to address the meeting virtually, please email committeeadmin@buckingham-tc.gov.uk or call 01280 816426 for details.

The meeting can be watched live on the Town Council's YouTube channel here:

<https://www.youtube.com/channel/UC89BUTwVpjAOEIdSlfcZC9Q/>

Claire Molyneux
Town Clerk

AGENDA

1. Apologies for absence

Members are asked to approve or not approve apologies for absence.

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. PL/26/05166/OA Land off Buckingham Ring Road East, Buckingham

Outline planning application for up to 90 residential units and heritage/visitor centre of up to 225 sq.m. with all associated parking, services, utilities, drainage, landscaping and open space (Matter to be considered at this stage: access)

Briggs [Manor Oak Homes]

[IM/28/26](#)

4. The draft Buckinghamshire Local Plan

To receive a report from the Town Plan Officer

[IM/29/26](#)

Twinned with Mouvaux, France;



Neukirchen-Vluyn, Germany



Valmadrera, Italy



Members are reminded when making decisions that the Public Sector Equality Duty 2010 requires Members to have due regard to the need to: Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Act, advance equality of opportunity between people who share a characteristic and those who don't, and to foster good relations between people who share a characteristic and those who don't. All Committee documents can be found on the Buckingham Town Council's website. Alternatively, the Clerk can send you a copy of any minutes, reports, or other information. To do this, send a request using the contact details set out above.

5. Letter from Croudace Homes

To receive a report from the Town Clerk
Letter from Croudace Homes

[IM/30/26](#)
[Appendix A](#)

6. Chair's announcements - for information only

7. Date of next meetings:

Full Council:	Monday 21 st September 2026
Interim Council:	Monday 19 th October 2026

To:

All Councillors

BUCKINGHAM TOWN COUNCIL

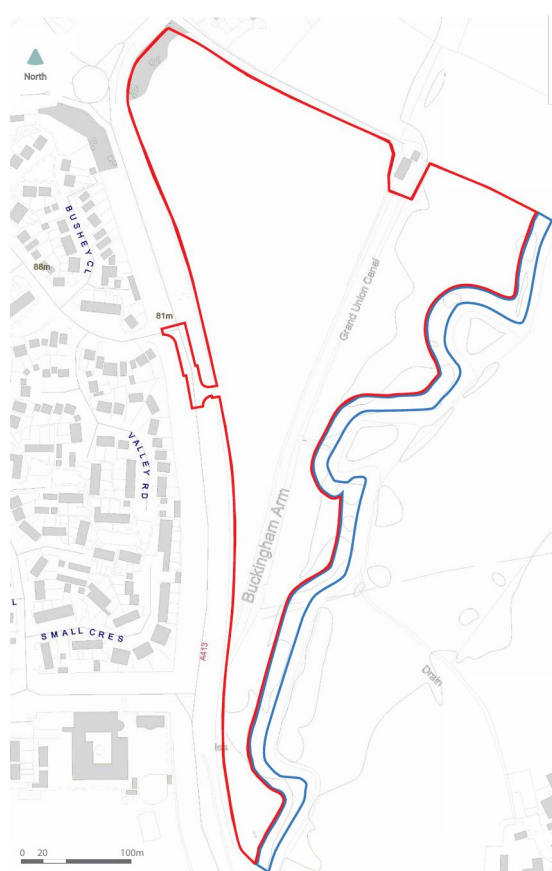
INTERIM COUNCIL

MONDAY 17th AUGUST 2026**Additional information on Planning Application for a mixed use development including up to 90 dwellings and a heritage/visitor centre east of the bypass and south of Stratford Road**

Contact Officer: Mrs. K. McElligott, Planning Clerk

PL/26/05166/OA**Land Off Buckingham Ring Road East**

Outline planning application for up to 90 residential units and heritage/visitor centre of up to 225sqm, with all associated parking, services, utilities, drainage, landscaping and open space (matter to be considered at this stage: access)
Briggs [Manor Oak Homes]



Location plan



Parameter plan

Key

- Site Area 9.77 ha
- Residential Area 2.28 ha (including incidental open space, landscape, paths and roads) - up to 2 storey
- Residential Area 0.7 ha (including incidental open space, landscape, paths and roads) - up to 3 storey
- Visitor Centre Location (0.2 ha)
- Public Open Space including landscape, footpaths and cycleways
- SuDS feature (indicative extent)
- Indicative Principal vehicular route
- ↔ Internal Pedestrian and/or Cycle connections -indicative locations
- Existing PROW
- Existing Bridleway
- Proposed Pedestrian Crossing
- ⬢ Proposed Vehicular Access

The site is CLH2 in the Neighbourhood Plan and is east of the bypass and west of the river, south of the A422, and includes the re-watered part of the canal. The towpath is part of the Ouse Valley Way. The land between Stratford Road and Bourton Road was undeveloped until the Buckingham Borough Development Company was formed in 1971 and in 1978 a link road between the A421 and A422 was proposed as an enabling measure so that the areas now Linden Village and Badgers could be developed. The link road became the eastern bypass and later this was extended south of Bourton Road to meet the realigned A421 and new southern bypass, first to London Road, and then to Tingewick Road

The Neighbourhood Plan entry for site CLH2 is attached to this report as an appendix.

Members nominated as Trustees should be aware that the Buckingham & Gawcott Charitable Trust has a financial interest in this application inasmuch as it owns a 10-foot wide 'ransom strip' in the highway verge

on the east side of the bypass from Stratford Road to Bourton Road and then from Bourton Road round to London Road. The Trustees have agreed to abide by the terms of the Land Transfer document, which will mean a proportion of the eventual sale price will be received, rather than negotiating a separate deal.



1947 Aerial photo; the area before the bypass and the Realignment of Stratford Road. Circled are the 5 houses, now on the layby on Stratford Road.
X is the approximate position of the Page Hill roundabout.



Undated aerial view of site; Linden Village on the left, Home Farm and Manor Farm on the right. EA flood maps show no flooding west of the canal

The former use of the site was agricultural, and part of it was allotments:



The northeastern area used as allotments
 The red line is the ransom strip.



Enlargement of the access road area and the hardstanding with the Allotment Society's sheds in the triangular space.
 Burleigh Piece northern access on the left

Matter for discussion and comment at this stage.

Access

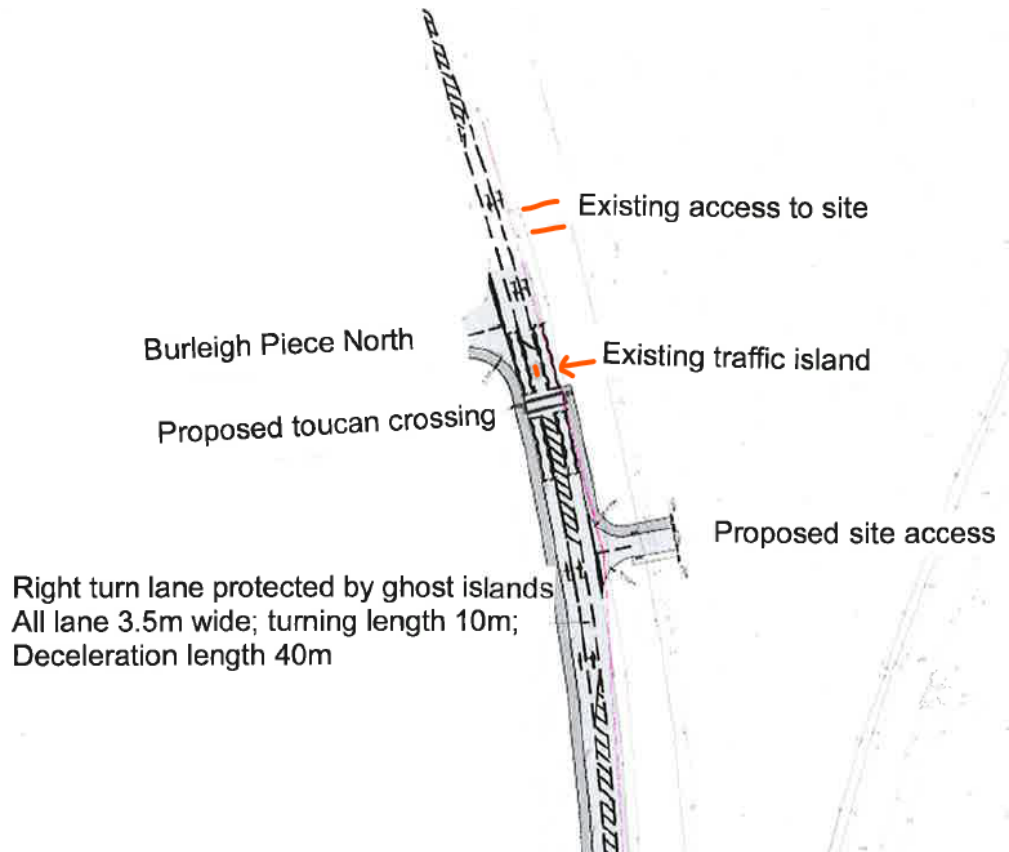
A single access is proposed from the bypass south of the northern Burleigh Piece junction. This is not where the current access is, see section of the allotment plan above and the Google Streetview photo below.



The bypass, looking south; existing access to the site on left, Burleigh Piece on right with existing right-turn lane



The bypass, looking south at the Burleigh Piece junction; the Toucan crossing is proposed just beyond the existing traffic island, and the new access approximately where the lorry is.

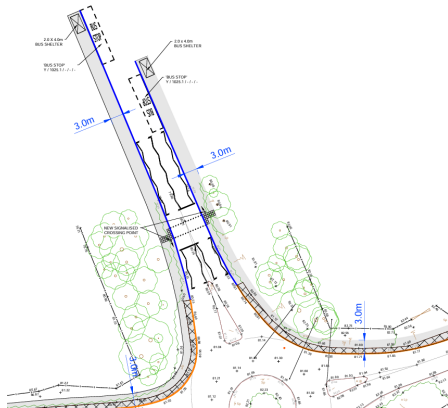


The proposed site access, with current access and traffic island added

The access point is to serve vehicles as well as cyclists and pedestrians, who will have a 2m wide footpath on each side of the 6m wide roadway. The northern side path will continue along the bypass to a new toucan crossing just south of the existing traffic island at the Burleigh Piece junction. A new pedestrian/cycle path will be installed on the Linden Village side of the bypass going north and south to connect with both Burleigh Piece junctions. I have included a stitched-together drawing to show the full extent of the proposal on the next page.

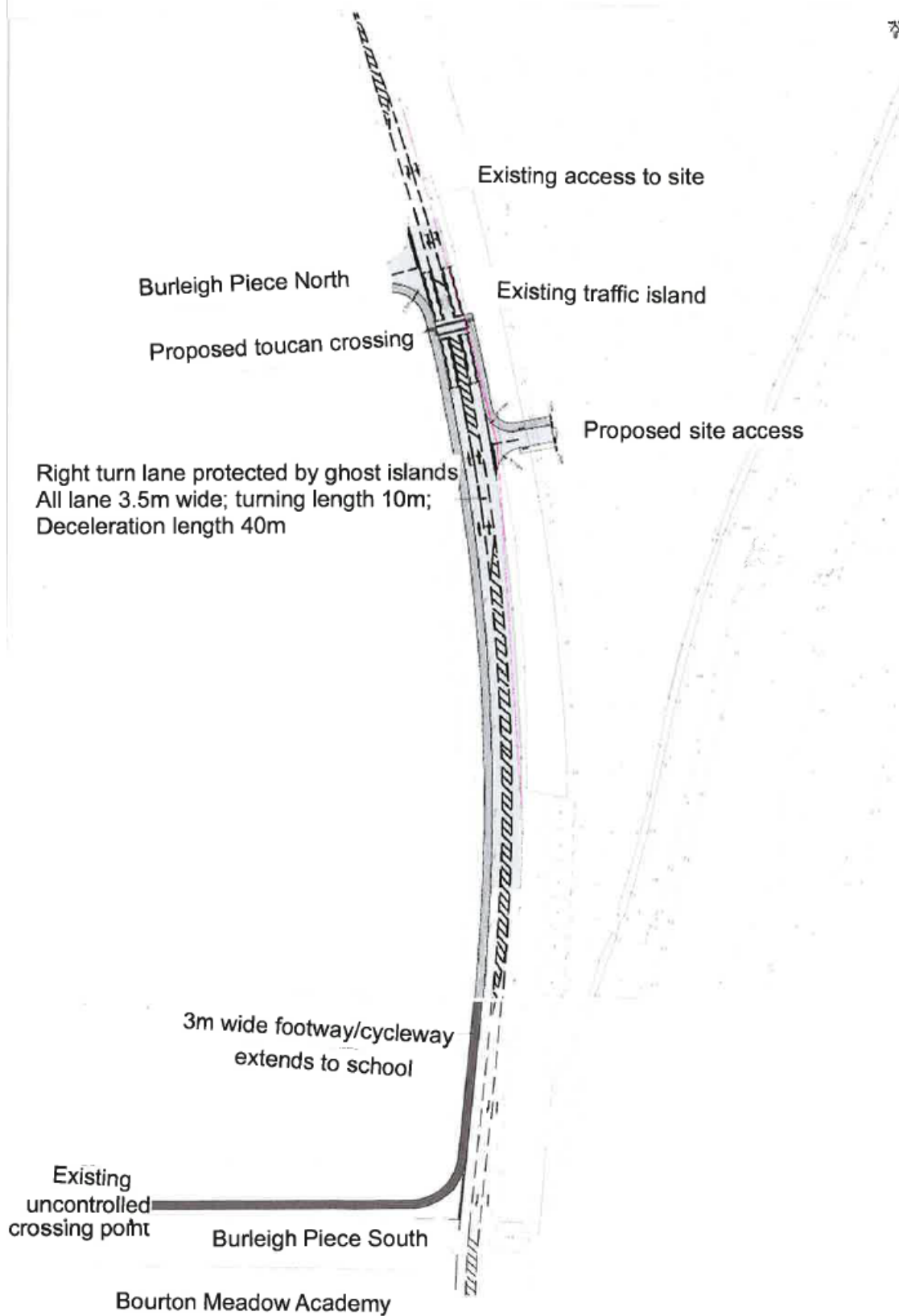
There is an existing centre lane on the bypass for southbound vehicles turning into Burleigh Piece (north) with warning hatchings on its taper; a similar arrangement is proposed for northbound traffic turning into the new estate, with a considerably longer hatched taper, and there is also a hatched area between the two accesses which includes the toucan crossing. I would have preferred the toucan crossing to have been south of the access, given the propensity of people, especially children, to take the shortest route – and their most likely destination is going to be the school or the park play areas.

Members are reminded that there is to be another toucan crossing installed just north of the Bourton Road roundabout for the benefit of residents of the 220 homes approved for land south of Bourton Road (24/03426/AOP) and a pair of bus stops between this crossing and the southern junction with Burleigh Piece.



Bourton Road roundabout from 24/03426/AOP Highways document

This drawing has been created from two drawn at different scales to provide the full picture



APPENDIX

RELEVANT SECTION OF THE 2026 NEIGHBOURHOOD PLAN DOCUMENT

(pp 42-48) **CANAL AREA**

- A. The Neighbourhood Plan allocates 11.6 ha of land at Bourton Meadow, with a developable area of approximately 3.73 ha, as shown on the Policies Map, for a mixed-use development scheme comprising:
 - i. A new small scale visitor interpretation centre for a mix of local community uses (Class F1/F2) and associated parking; and
 - ii. An enabling residential scheme of approximately 90 homes.
- B. Development proposals should be underpinned by:
 - i. an illustrative masterplan that defines the land uses and sets out the key development principles for access, layout, and design;
 - ii. a delivery plan setting out how the visitor centre and associated parking will be secured and delivered, with the requirement that a planning obligation is agreed to require the scheme to be delivered and available for operation before the final occupation of the residential scheme at the latest; and
 - iii. details about the way in which the proposal responds positively to the development principles in Part C to J of this policy.
- C. The visitor centre scheme should be entirely within the developable area and consist of a single building which should be located adjoining to the associated parking and designed in a way that will protect the amenities of nearby residential properties.
- D. The enabling residential scheme should be located entirely within the developable area and shall comprise a tenure mix of 35% affordable housing and 65% open market housing and shall be located in such a way that relates well to the visitor centre scheme to aid natural surveillance.
- E. The design strategy should have regard to all the relevant provisions of Buckinghamshire and Buckingham Design Guidance and Codes and reassert the history of the canal within the town. The strategy should sustain and enhance the significance of the setting of the Buckingham Arm of the Grand Union Canal as a non-designated heritage asset.
- F. The development of the site should be supported by a transport strategy which makes provision for a new single access point and a combined access/crossing onto the A413 at the northern junction of Burleigh Piece.
- G. The layout of the site should create new routes across the A413 to improve public access to Bourton Meadow and enhance connectivity with the wider countryside beyond. The layout should also accommodate new active travel routes within the site and improving the accessibility of the towpath along the Buckingham Arm section of the Grand Union Canal. These routes shall be well-signposted with information boards, nature hides and observation areas.
- H. The layout and landscaping scheme should have particular regard to the character of the Local Landscape Area, as set out in the report "Defining the special qualities of local landscape designations in Aylesbury Vale District" (Final Report, 2016) and the Landscape Character Assessment (2008), or any subsequent versions, and shall acknowledge views across the site from the Ouse Valley Way. The scheme should also demonstrate how it has responded to the location of the site as a transitional edge-of-town and rural countryside setting.
- I. The green infrastructure strategy should make provision for onsite public open space and biodiversity net gain of at least 10% (as measured by the most up to date metric) as part of its proposals to integrate with the wider network of green infrastructure. The strategy should:
 - i. minimise the loss of existing mature trees and hedgerows within the site boundaries;

- ii. use species of known benefit to UK wildlife in any soft landscaping proposals;
- iii. include a minimum 10 metre buffer area along the River Great Ouse which should be designed to be kept free from human disturbance comprising semi-improved grassland/other neutral grassland with scattered scrub and occasional individual trees;
- iv. introduce permanent or ephemeral waterbodies (such as ponds, scrapes, ditches and rain gardens) on site to create new habitats as part of a natural flood management strategy; and
- v. demonstrate how it supports habitat creation along the Buckingham Arm of the Grand Union Canal and River Great Ouse.

- J. The flood and drainage strategy should direct more vulnerable development away from areas subject to flood risk and demonstrate that full consideration has been given to an infiltration drainage system and maintaining water levels of the Buckingham Arm of the Grand Union Canal as part of an overall SuDS strategy that incorporates natural flood management measures.



Concept Plan (p.44)

1. The [2015] made neighbourhood plan recognised that this area of land had potential to enhance the green and blue infrastructure and the historic significance of the former and current Buckingham Arm of the Grand Union Canal, and its potential as a tourist attraction, and it supported new development that delivered these aims. It was intended to aid the Buckingham Canal Society in redeveloping the Buckingham Arm of the Grand Union Canal which forms part of a wider strategy to reopen the canal as a working water way with links through to Cosgrove. The policy now allocates the site for specific purposes building on the original framework set out by the made neighbourhood plan.
2. The allocation extends to 11.6 ha of land at Bourton Meadows on the eastern edge of Buckingham and includes a new visitor centre scheme and associated parking, and green and blue infrastructure enhancements, together with a housing scheme that will enable the delivery of these benefits. An illustrative proposal for the site is shown in Figure 17 *[a map of new and existing green spaces; not included in this copy]*. Policy CLH2 sets out the context within which the site should be developed. Key elements include the need for development proposals to relate to an agreed masterplan (Part B) and to satisfy a series of development principles (Parts C to J).
3. The land is in control of a single developer and can be delivered within the next five year plan period with development expected to be completed by the end of 2029. The developer is working with the Buckingham Canal Society and other local stakeholders to develop the scheme and has confirmed that a viable scheme can be delivered as per policy requirements. The Buckingham Canal Society is a well-established organisation affiliated to the Inland Waterways Association and one of the main objectives is to promote the education of the public in the history and use of the canals and waterways and Buckingham Canal in particular. The inclusion of a small visitor centre to provide information and a base for educational activities for the Canal Society contributes to meeting this objective and the specific function and design of the building is being agreed with the Canal Society and through public consultation. The use of the building is likely to incorporate a mix of Class F1 (Learning and non-residential institutions) and Class F2 (Local Community Uses) uses. Whilst the building may include a café or small plant nursery, these would be ancillary to the main uses of the building and not a separate standalone facility. A small car park is also planned to serve the facility. The Buckingham Canal Society, and other local stakeholders, will seek to agree these matters with the developer as a priority on the making of the Plan.
4. The housing scheme will enable the land to be made available from its private owner to achieve the visitor centre scheme, as well as a range of green and blue infrastructure improvements, including new active travel and recreational movement routes. The new homes will also contribute to the housing supply in Buckingham over an extended plan period.
5. The policy defines the developable area of the site and this is located within Flood Zone 1 and at a low risk of flooding from other sources. The north-eastern part of the site is located within Flood Zone 3 and is subject to a high surface water flood risk. This land is excluded from the developable area. Amenity open space, nature conservation and biodiversity proposals are water-compatible development and are planned to be located within this north-eastern part of the site. For all these reasons, it has not been necessary to undertake a sequential test in line with national policy and guidance. Given these flooding constraints on the site, the policy also requires the flood and drainage strategy for the site consider an infiltration drainage system. If an infiltration technique is not viable, a detention basin will be required to slow the rate of run off into the River Great Ouse to the south of the site. A detention basin is water-compatible development and can therefore be located within Flood Zones 1 and 2 without the need to undertake a sequential test in line with national policy and guidance. The strategy will also need to consider maintaining water levels of the Buckingham Arm of the Grand Union Canal. In this respect, it is noted that a top-up pump solution which uses a solar powered pump to draw water from the river water to maintain canal water levels is already operational. The applicant will also need to comply with VALP policy I4.
6. This neighbourhood plan seeks to identify the Buckingham Arm of the Grand Union Canal as a non-designated heritage asset as part of the historic infrastructure of the town. The policy therefore also requires that the design strategy should sustain and enhance the significance of the setting of this non-designated heritage asset alongside meeting the provisions of existing design guidance and the

Buckingham Design Code which is expected to carry the full weight of the development plan following the making of this Plan.

7. A new access point into the site is likely to be required from the A413. Anticipated traffic volumes into the site at the detailed testing and planning application stage will determine the nature and scale of the access point. The Town Council's preferred option would be for combined access/crossing at the northern junction with Burleigh Piece in the form of a traffic signal controlled new single access point onto the A413. The policy requires that the consideration of options is demonstrated and that the final option is agreed to the satisfaction of the Highways Authority.
8. The policy also makes provision for the development to provide new active travel routes across the A413. The Town Council's preference is for this to include the provision of a Toucan crossing at the preferred traffic signal-controlled junction with Burleigh Piece (northern junction) and a second Toucan crossing to the south of the development to serve the existing Ouse Valley Way. There has been a long-standing aspiration to improve the accessibility of the towpath along the Buckingham Arm section of the Grand Union Canal, and new active travel routes within the site are also important. Negotiations have included the provision of information boards, nature hides and observation areas. These (active travel strategy) provisions have been made to improve public access to Bourton Meadow and to enhance connectivity with the wider countryside beyond.
9. The site lies at the edge of the town where it meets the countryside in a location that is considered to have important landscape characteristics. As such the site falls within a local designation, a Local Landscape Area. The policy therefore requires the layout and landscaping scheme to respond to this.
10. The neighbourhood plan is supported by its own evidence base and benefits from the insights of a desk-based ecological assessment prepared by Future Nature WTC, which is published alongside this plan. It recognises that the River Great Ouse, which passes through the west of the site, is a designated a Biological Notification Site due to its raised ecological interest and that the site lends itself to the creation of wetland habitats with a focus on the species they may support. That would also serve as a natural flood management strategy. The policy therefore requires the consideration of specific measures as part of the wider green infrastructure strategy which also reflects wider requirements imposed by national policies.
11. The site also lies within a Mineral Safeguarding Area for limestone and clay, silt, sand and gravel. Policy 1 of the adopted Buckinghamshire Minerals and Waste Plan 2016 – 2036 requires schemes located within such areas, that are not development exempt from its requirements, to demonstrate that prior extraction is possible; the development is of a form or nature that would not hinder future extraction; there is an over-riding need for the development; or that the resource is not viable. The proposal does not meet exemption criteria and the policy therefore seeks to ensure that this test is undertaken and demonstrated as part of any planning application submitted.
12. The policy requires that any planning application that wishes to benefit from its support must be comprehensive in covering all of its elements and must set out precisely how and when the visitor centre scheme will be delivered. This reflects the fact that the housing scheme will enable its timely delivery, leaving no prospect that it will be built out and occupied before it is secured and able to operate. This will be done through a planning obligation, which will also secure other elements of the policy, for example its provision of affordable housing. The land interest has confirmed that this approach is reasonable and acceptable and that the project is small enough to be completed in one phase comprising all its elements. In which case, it is not considered neither necessary nor reasonable for the policy to require the delivery of the visitor centre scheme any earlier than before the housing scheme is completed and almost completely occupied.

(P46 map of other current developments not included)

Buckingham Town Council
Interim Full Council
Monday 17th August 2026

Contact Officer: Town Plan Officer

The draft Buckinghamshire Local Plan

1. Recommendation

1.1 The Town Council submits the following comments on the policies in the draft Local Plan in the Regulation 19 Consultation, allowing officers to supplement with additional supporting evidence, if necessary, before submission.

2. Summary

2.1 The Buckinghamshire Local Plan, when adopted, will run until 2045. The draft has been published for Regulation 19 Consultation, which ends on 6 September 2026.

This report sets out recommendations for Buckingham Town Council's responses to the draft. Buckingham Town Council made representations in October 2025 for the Regulation 18 consultation [first part], and also on the Site Evaluation Engagement in March 2026 [which is being viewed as Regulation 18 consultation, part 2].

The report also sets out how and where the proposed Local Plan will have impact on Buckingham and how it will interact with the Buckingham Neighbourhood Development Plan made earlier this year. This has informed the recommendations as to appropriate responses to the Regulation 19 Consultation.

A Working Group meeting on 27 July 2026 identified key areas for responses, including affordable housing numbers; delivery of infrastructure especially schools; and transport. It also focuses on clarifying the interaction of the existing and non-conflicting BNDP policies as part of the Development Plan with the new policies of the draft Local Plan.

The responses must only be directed towards whether the policies are sound, deliverable and legally compliant. The National Planning Policy Framework [NPPF] covers this in Paragraph 36: positively prepared; justified; effective and consistent with National Policy; there is more detail in Paragraph 16. The Planning Policy Guidance [PPG] is informative on the interaction between Neighbourhood Development Plans and Local Plans especially when not in conflict.

The draft Local Plan and supporting documents can be found here:

<https://www.buckinghamshire.gov.uk/planning-building-and-environment/policy-breaches-and-enforcement/buckinghamshire-local-plan/reg-19-consultation/#before-you-begin>

3. Strategic Policies

SP1: Sustainable Development

3.1 Buckingham Town Council would wish to see a clearer mention and understanding of the role of Neighbourhood Plans in the Development Plan. This may be covered by reference to NPPF policies but given that Neighbourhood Development Plan policies and allocations have been through independent examination and referenda, and are occasionally mentioned in policies and supporting text throughout, it is submitted that clear indication of inclusion of such policies in the Development Plan, alongside the Local Plan would add clarity to the implementation of the policies.

3.2 This does not appear to be in accordance with PPG “Where a neighbourhood plan has been brought into force, the local planning authority should take its policies and proposals into account when preparing the local plan. Local plan policies should not duplicate those in the neighbourhood plan, and do not need to supersede them unless changed circumstances justify this. It is important for local plans to make appropriate reference to neighbourhood plan policies and proposals, and similarly for neighbourhood plans to acknowledge local plan policies that they relate to.”

[Paragraph: 006 Reference ID: 61-006-20190723]

3.3 There is a lack of clarity through the inconsistency of referencing Neighbourhood Plans that could lead to an interpretation of utilising the principle that once a neighbourhood plan has been referenced in one policy, if it is not referenced in other policies, then the presumed intention is to exclude the neighbourhood plan. If the intention is to supersede Neighbourhood Plan policies on a subject, then the above PPG requires that this is justified by reference to changed circumstances.

3.4 Buckingham Town Council submits that this is not consistent with other statements of national policy under NPPF Paragraph 36(d) as well as Paragraph 16(d) as the Plan is not thus clearly written for the use of a decision maker in that it is not consistently clear when NDP policies will apply, and Paragraph 16(f) may duplicate unnecessarily policies which apply through the Development Plan, by not clearly indicating if the intention is to supersede existing non-conflicting NDP policies and providing the required justification for so doing under the PPG.

3.5 Buckingham Town Council is concerned that the duty to co-operate under s.33A of the Planning and Compulsory Purchase Act 2004 has not been discharged by Buckinghamshire Council in preparing this plan. A significant portion of development (over 12,000 new homes) is allocated near the boundary with the city of Milton Keynes. There is no entry in Appendix 1 to the Sites Engagement Consultation Statement for Milton Keynes City Council. The assumption must be that no such consultation has taken place despite the significant and strategic allocations made in this Plan. In addition, it is clear that West Northants was not made aware of the Turweston NESS when discussions were held between the two councils, despite this site being adjacent to the boundary and the Infrastructure Delivery Plan Appendix 1 identifying the need for discussions over the possibility of Turweston NESS residents

accessing the secondary school in Brackley, with the result that no on-site secondary school allocation is made in the Plan.

3.6 These points indicate that Buckinghamshire Council has, in addition, not discharged its specific requirements under NPPF Paragraph 26, and is thus not compliant with NPPF Paragraph 36(c) and (d) as well as its statutory duty under the 2004 Act above. In particular, Paragraph 36(c) states the requirement of “effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred” which seems particularly pertinent in relation to West Northants.

SP2: Housing strategy

3.7 Buckingham Town Council is concerned that there is a minimal buffer of 35 homes provided for the delivery of the required need of 91,230 new homes in the plan period. Many of the sites allocated appear to be subject to requirements being met such as flooding alleviation, which make ultimate delivery of some sites uncertain. Non-delivery of a significant site, which need not even be a NESS, would endanger the delivery of the required number of homes.

3.8 In addition, Buckingham Town Council can identify that the suggested densities on some allocations within Buckingham are inappropriate. For example, the Bourton Meadow site [Opus 3263] lies on the settlement boundary, facing open countryside, and is allocated 150 homes on 5.84ha. This site is also allocated in the Buckingham Neighbourhood Development Plan [CLH2] at 90 homes, allowing for situation and typological constraints. The site is now the subject of a pre planning application for up to 90 homes. The Western Garages site [Opus 3540] is a 0.17ha open green space amenity area adjacent to semi-detached and terraced two storey homes; flats would dominate but would be necessary to achieve the number of homes suggested. If there are other sites with similarly optimistic densities in other towns and parishes then this will also reduce the resulting housing figures, again without a buffer in place.

3.9 Buckingham Town Council submits that this fails to satisfy NPPF Paragraph 36(a) “as a minimum, seeks to meet the area’s objectively assessed needs”

3.10 This will open up speculative development (or windfall) to fill the gaps in numbers if no buffer is supplied. A large amount of speculative development is not genuinely plan-led development, [NPPF Paragraph 15] and these assessments leave this draft Plan vulnerable to not being judged as “sound.”

3.11 It is stated that this figure does not include an unmet need in neighbouring counties [paragraph 5.21], but there does not seem to be any evidence of consultation such as Statements of Common Ground as required by NPPF [Paragraphs 11(b), 24, 26, 27 & 28] as to whether such need exists. Appendix 1 to the Sites Engagement Consultation Statement indicates that discussions have taken place with some neighbouring counties but discussion of housing needs did not seem to be recorded with West Northants (in contrast to other authorities), and there is no record of any discussions at all with Milton Keynes City Council. As MK City Plan 2050 is at similar stage, there is an opportunity to assess needs; similarly West

Northamptonshire Local Plan has gone through Regulation 18 consultation and the new Cherwell District Plan is moving slowly towards examination.

3.12 In addition to unmet need, such proximate development at Turweston NESS, and Beachampton NESS and the adjacent site allocations, totalling 12,000+ homes on the Milton Keynes border, are allocated without any evidence of Statements of Common Ground as required by NPPF [Paragraphs 11(b) & 28] in relation to delivery of such services as health and education, particularly in the short-medium term of development. Is the necessary infrastructure for such sites deliverable without reliance on cross-county arrangements? Given that this represents a significant portion of the required total of new housing, there appear to be concerns as to overall deliverability especially in the absence of a buffer.

3.13 It is noted that approximately 75% of the allocations are in the North & Central Area of the county. It is assumed that this avoids any consideration of Green Belt or even significant Grey Belt allocations [despite it being suggested in paragraph 4.1 that Grey Belt use had been maximised] in the other areas of the county, but whether delivery of 75% of new housing in one area serves the needs of all within the Local Plan Area is uncertain, and it will impact on the aspirations for reducing journeys, and also impact on economic improvement if workers in the South & West cannot find housing close to their employment. It also jeopardises Local Plan Objective 1(a) preserving the predominantly rural character of Buckinghamshire, certainly in terms of the North & Central, for the benefit of Local Plan Objective 1(b) – protecting valued landscapes. It is not demonstrated how this will provide homes for key workers in the South & West [Local Plan Objective 3(b) due to the disproportionate distribution, and the need for key workers to live locally for preference].

3.14 This is also not in compliance with Local Plan Objective 6(d)&(e) regarding water and sewerage infrastructure. Paragraph 4.27 identifies from the Water Cycle Study – seven water treatment works - four of which, Aylesbury, Winslow, Steeple Claydon & Buckingham are located in the North & Central Area which is allocated approximately 75% of the new housing- which will have exceeded their flow permits by 2045. Significantly, Table 7.3 in the Water Cycle Study notes that there has been no testing at Beachampton as there is unlikely to be any significant development. Although the Beachampton NESS will be delivered later in the phasing, to allocate such a significant site without testing deliverability is of concern, as delivery will be dependent on third party providers' business cycle. The map provided in the Water Cycle Study at Figure 7.4 shows how little capacity is available in the North & Central Area. It is noted that Paragraph 5.17 states that the NESS allocations are based on future possibility in terms of infrastructure but this risks a significant proportion of the required housing not ultimately being deliverable.

3.15 Buckingham Town Council submits that this is not a sound policy in terms of deliverability of stated needs or Local Plan Objectives, and fails to comply with NPPF requirements specifically Paragraph 36(a) *[Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from*

neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development] (c) *[Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground]* for the above reasons.

3.16 Buckingham Town Council also submits that the statutory duty under s.33A of the Planning and Compulsory Purchase Act 2004 may not have been met as there is no record of discussions with Milton Keynes City Council in the evidence base.

SP4: Economic Development

3.17 Buckingham Town Council supports the allocation of 1.7ha within the Buckingham NESS but is concerned that this requires more robust evidence to support employment land in Buckingham to ensure deliverability of the new allocation. The Buckingham NESS employment allocation [given key employment status] and the Land between Osier Way & Natco Factory allocation are supported. The concern focuses on the view expressed by the Planning Inspector in Planning Appeal APP/J0405/W/24/3348499 stating that there was little need for more employment land in Buckingham, citing the fact that the project known as Buckingham 40, which is the current proposed venture on the Osier Way allocation, had received no interest in over a year. It was stated that Silverstone Enterprise Park was the more attractive prestigious destination for the automotive industry and that Buckingham's poor road connections were unfavourable compared to Milton Keynes, Bicester and Banbury [all outside Buckinghamshire]. Citing employment land at Kingsbrook and Berryfields also in the North & Central Area, it was held that there was an overall oversupply in this area. The lack of need was sufficient to outweigh the lack of compliance with VALP policy on marketing requirements before change of use.

3.18 Buckingham Town Council stresses it wishes to see these allocations develop as employment land for the rapidly expanding town, to allow residents to live near their employment and thus realistically promote active transport, that is why there is a concern that these sites do not have sufficient evidence to support them against challenge. In addition, the NPPF [Paragraph 86] requires the Local Plan "seek to address potential barriers to investment, such as inadequate infrastructure, services or housing". The A421 Corridor Study has identified the need for further modelling to demonstrate how improvements can be delivered between Milton Keynes and Buckingham but it is uncertain how this would be delivered to improve transport infrastructure deficits as noted by the Inspector above if the dualling occurs only at Milton Keynes as is now proposed in the Local Transport Plan 5 and the Infrastructure Schedule. There will also be further comment on SP4 and 25% affordable housing not ensuring that business can attract workers who can afford to live in the area (as is acknowledged in supporting text 5.65 as a requirement).

The same concerns regarding barriers to investment, would apply to the Silverstone Enterprise Zone, especially in relation to transport connections from Buckingham. There is no public transport, and the direct road via Dadford is unsatisfactory as a commuter route.

3.19 This policy has not been fully evidenced and as such not fully justified and thus at risk of not being sound which is disappointing to Buckingham Town Council. Buckingham Town Council submits that as presented this policy is not justified under NPPF Paragraph 36(b) due to the lack of proportionate evidence to support allocations. Buckingham Town Council would urge the strengthening of this evidence to prevent challenge to a policy which it wishes to support.

SP10: Buckingham Southern Spine Road

3.20 Although the Policies map may only be indicative, already part of the proposed route is not feasible due to committed development [Land West of London Road, Buckingham], as well as indicating a different alignment for employment area than in the committed development, which will make accessing the spine road more difficult for employment land traffic and will need to be realigned in order to benefit from protection from SP10.4(d) in order to further safeguard ahead of the development of the Buckingham NESS phased for later in the plan period.

3.21 It is submitted that the Buckingham component of this policy is already out of date from known committed development and is not supported by up-to-date evidence and thus does not comply with NPPF Paragraph 16(b) as not being positively prepared as it is aspirational but no longer deliverable in current form.

SP11: Renewable Energy

3.22 Buckingham Town Council in principle supports renewable energy sources. It is submitted that the following indicative sites may not be in conformity with SP11 policy.

3.23 Re Policies Map indicative site for Renewable energy wind 1.1 Silverstone– this would appear to be in one of the vistas from Wolfe’s Obelisk in The National Trust’s Stowe Landscape Gardens. It is noted that paragraph 5.131 of the supporting text mentions “Landscape Character and Visual Amenity”. This allocation may also not accord with SP11.5.c “demonstrate that there are no significant adverse impacts on landscape character, biodiversity or heritage assets” especially in relation to the height of wind turbines in this context.

3.24 Re Policies Map indicative site for solar energy 4.6 A421 Ridge – for solar energy – SP11.5.a “promote the efficient use of land, directing large scale solar development towards previous developed or non-agricultural sites” – this area stretches from Padbury to Nash and appears to be agricultural land, so it is not directed towards previously developed or non-agricultural sites.

3.25 In addition, it is not clear as to how SP11.5.b would be implemented across such a large area in order to prevent the “cumulative effect” with what would become “existing or permitted development” over the plan period. Buckingham Town Council submits that this policy is ambiguous to a future decision-maker as to what is permissible in terms of application of the policy contrary to NPPF Paragraph 16(d).

SP12: Community Facilities

3.26 SP12.3. “Existing community facilities and local services will be protected. Proposals resulting in their loss will only be supported where it is demonstrated that: a) Equivalent or better provision will be made or; b) The facility is no longer required or viable; supported by text 5.147 The policy also recognises the importance of protecting existing valued facilities. The unjustified loss of community infrastructure can undermine community sustainability, particularly in rural areas and smaller settlements.

3.27 Yet on SMA001 Small Site allocation listed in Appendix K – Opus 3180 (which appears to be the Library in the text, but the “The Centre” on the Policies map), either way this will involve the loss of a valued community facility – The Parish Church runs community coffee mornings and afternoon teas, and several groups including Project Street Life (an after-school club for young people), Bridge Club and the Repair Café all use this facility. The policy indicates that there should be a replacement facility provided as this is a viable community resource, but the size of the site means that delivery of an alternative facility is likely to render the development non-viable.

3.28 On this site allocation, the policy is not compliant with NPPF Paragraph 16(d) as there is a disconnect between the representation in the text of the allocation, and its representation on the Policies Map.

3.29 Similarly Western Garages site [opus 3540] is 0.17ha open green space community amenity area as designated on the Policies Map– yet there is no indication how the loss of this open green space will be replaced in conformity with this policy. As with the previous example, this could lead to non-delivery of this site.

3.30 On this site allocation the policy would seem to be lacking evidence of deliverability required under NPPF Paragraph 16(b) appearing more aspirational when considered with other Plan policies.

3.31 It is submitted that there is doubt as to the viability of at least two small-scale developments in Buckingham, and perhaps elsewhere, and that the policy is therefore not positively prepared, being aspirational but not clearly deliverable, and thus not compliant with NPPF Paragraph 16(b).

SP13: Natural environment and climate resilience

3.32 In relation to Paragraph 5 – The Environment Agency also provides Anglian Water with a River Basin Management Plan [<https://www.gov.uk/guidance/anglian-river-basin-district-river-basin-management-plan-updated-2022>]– this should also be part of the policy to ensure that the Upper and Bedford Ouse area is also protected from the large amount of development allocated in the relevant area around the River Great Ouse, or the reason it is not included made clear. This would then provide a clearer policy with supporting text 5.164 “We will continue to do so as proposals in this Plan are delivered and to inform any reviews of the Water Framework Directive or relevant River Basin Management plans.” There is no apparent justification for mentioning only Thames Water in the actual policy. In general, it should be made clearer that there are other water management companies operating in Buckinghamshire, besides Thames Water.

3.33 Buckingham Town Council submits that this is not clearly written as there is ambiguity as to which Plans are to be considered, not compliant with NPPF Paragraph 16(d).

SP14: Placemaking and Design

3.34 Supporting Text 5.175 states “Buckinghamshire contains a rich variety of towns, villages, landscapes and heritage assets, all of which contribute to local identity and character.” [emphasis added]

3.35 SP14.3.a makes reference to the Buckinghamshire Design Code [Appendix J] which in turn makes mention of “local character” yet the draft Local Plan makes no mention of Design Codes and Policies contained within Neighbourhood Plans which would inform the local character for the variety of areas through the county, providing greater detail as to “local character”.

3.36 Buckingham Town Council submits that this does not satisfy NPPF Paragraph 16(d) as to clarity to a decision-maker, and also not in accordance with the PPG:

“Where a neighbourhood plan has been brought into force, the local planning authority should take its policies and proposals into account when preparing the local plan. Local plan policies should not duplicate those in the neighbourhood plan, and do not need to supersede them unless changed circumstances justify this. It is important for local plans to make appropriate reference to neighbourhood plan policies and proposals, and similarly for neighbourhood plans to acknowledge local plan policies that they relate to.”[Paragraph: 006 Reference ID: 61-006-20190723; emphasis added] as there is a need to make clear that the Buckingham Design Code [Policy DLH1 in the BNDP] and the Buckinghamshire Design Code will work together within the Development Plan, as there has been no justification for the Buckinghamshire Design Code to supersede BNDP DLH1 which supplies the “local character” detail referenced in the Buckinghamshire Design Code. This also pertains to other Neighbourhood Development Plans which have design policies.

3.37 It is submitted that this also fails to accord with NPPF Paragraph 16(f) as to unnecessary duplication of policies and Paragraph 36(d) as not being consistent with “other statements of national planning policy” for not engaging with the relevant PPG.

SP15: Conservation and enhancement of heritage assets

3.38 Buckingham Town Council believes that the additional example of the National Trust’s Stowe Landscape Gardens would enhance the usefulness of supporting text 5.186, not only is it a major historic asset in the north of the county which is allocated 75% of new housing, but it has an impact on the constraint of development of Buckingham as a Tier 2 settlement. This is suggested to aid clarity for decision-makers under NPPF Paragraph 16(d).

4. Site Allocations

NESS008: Buckingham

4.1 The policies map and indicative illustration require updating in light of Planning commitment -PL/26/04558/DE / APP/J0405/W/24/3348499 (Land west of London Road, Buckingham) and planning application - PL/26/04516/OA (BNDP Policy HP3 allocation). The employment land has been realigned and is now horizontal to A413 rather than parallel to the A413. The indicative Buckingham Southern Spine road will need to be reconsidered as both the commitment and the application do not allow for the current position on the Policies Map. This will provide an opportunity to rethink the positioning of a road, which has the potential to divide this site not only for internal areas but also with the town centre of Buckingham.

4.2 It should also be acknowledged that there is already a commitment of up to 300 homes on this site, with an additional potential of 800 coming forward as HP3 of the BNDP at pre-planning stage already. It is then questioned whether the phasing of this NESS is accurate as described in Appendix F as the commitment will mean 300 homes in the near future whereas the delivery of the first 50 homes was not expected until 2032/33 (in fact Appendix F suggests that 1100 homes would not be expected to be delivered until 2039/40). To ensure that essential infrastructure is delivered apace, it is submitted that the wording of this allocation is adapted to protect a new route for the Southern Spine Road (alongside TR2) and to ensure early delivery of the much-needed secondary school – it is not sufficient to relegate this to the supporting text at paragraph 6.88 with such lack of specificity. It is noted that other NESS allocations have much more specific educational requirements as part of the actual policy.

4.3 It is submitted that this would aid clarity of the policies for decision-makers in line with NPPF Paragraph 16(d)

4.4 As regards the provision of the secondary school, it has been possible in all but the Buckingham and the Winslow NESS to be very specific about the school requirements. In an area that has lost a Sixth Form [Winslow] and has a secondary school that is full [Buckingham] it would be hoped that developers would have been given the same indication as to provision of educational infrastructure as the others. If the calculation can be done for all the other NESS allocations, it should be done for Buckingham and Winslow.

4.5 In addition, there is no provision for a secondary school on site in Turweston NESS (only off-site contributions but Buckingham School would have difficulty expanding in the current campus), and it cannot be relied upon without formal agreement that another county will take on the provision (also lacking as noted in SP1 comments above). This will mean pressure on the existing secondary school in Buckingham.

4.6 In the Infrastructure Delivery Plan, Appendix 1 entry for this notes “that it is within walking distance to a secondary school in Brackley, with the possibilities of discussions with West Northants Council.” There is no mention of a Statement of Common Ground on secondary education provision in the site allocation, so it may

be presumed that this has not yet been undertaken, or that it has met with resistance. It is noted that the Sites Engagement Consultation Statement, Appendix 1(Duty to Cooperate and other key bodies' responses) is non-committal in terms of success with West Northants on this topic.

"The Council will continue to engage constructively with West Northamptonshire Council to better understand their concerns and to identify whether any additional evidence or assessment is necessary." In response to a summary of West Northants' concerns:

"The response raises concerns regarding the lack of engagement with West Northamptonshire Council on the Turweston site, particularly noting that it was not identified or discussed during prior Duty to Cooperate (DtC) meetings or subsequent engagement. The Council states that early and ongoing discussion would have been expected given the cross-boundary impacts. It also highlights that infrastructure implications affecting West Northamptonshire have not been discussed through DtC processes. Overall, there is a clear concern that procedural engagement has been insufficient and that cross-boundary collaboration has not been adequately undertaken."

4.7 Prima facie this is not in compliance with NPPF Paragraph 36(c) and Paragraph 16(c) and doubt may be raised as to how it complies with the statutory duty to consult under s33A of the Planning and Compulsory Purchase Act 2004 when a neighbouring council was not informed of a strategic site on their boundary in consultations as is recorded above.

4.8 The alternative, of course, is that these secondary students will be in the catchment area for Buckingham schools, which will place an additional burden of numbers, when there is no definite commitment in the Local Plan for a new secondary school on the Buckingham NESS site allocation.

4.9 In addition, Beachampton NESS is not scheduled to be developed until the latter part of the plan so will not be providing new secondary schools for the MK Border in the medium term, so students will continue to come to Buckingham from that area, as the Salden Park Secondary school is only considered as a potential delivery, so there are no new secondary schools coming forward in that vicinity. The pressure will continue on the Buckingham secondary schools as 1100 of these homes on this allocation are due to be delivered much earlier than scheduled in Appendix F with no additional secondary school provision.

4.10 It is submitted that this lack of equivalent detail questions the deliverability of these sites in terms of calculating viability. There is a failure to provide a coherent policy for the delivery of educational infrastructure. There is one primary school to be delivered through BNDP HP3 site allocation, which forms part of the Buckingham NESS but no consideration has now been given as to where these students will attend secondary school. There are policies promoting active travel from new development, but it is not clear where and how these children from all these sites will go to school.

4.11 This renders the provision of secondary school infrastructure in the policy as not “positively prepared” and not in compliance with NPPF 36(a) as not meeting the area’s objectively assessed needs and Paragraph 16(b) as being more aspirational than deliverable, especially as it is obvious that the delivery of this allocation has already started but with no clear plan as to how the developers will deliver the identified infrastructure.

4.12 Buckinghamshire Council has also failed to engage with the responses to this site at the Sites Engagement in March. In Appendix 4 to the Sites Engagement Consultation Statement, Buckinghamshire Council’s response to concerns as to how allocated development in the BNDP (HP3), (which forms part of the Buckingham NESS), as well as an existing commitment in Land to the West of London Road, Buckingham, (also now forming part of the NESS) would be integrated into the NESS and how this would be co-ordinated as it falls across the BNDP Area and Gawcott with Lenborough Parish Council land), was the repeated statement that Neighbourhood Plans do not provide enough development and that the new Local Plan takes precedence. This blunt approach fails to acknowledge both the actual point being made, which was not that there should not be further development, but also fails to acknowledge the nuanced approach of the NPPF and the PPG as to the interrelationship of Neighbourhood Development Plans and Local Plans. Nor does it deliver an answer to how developer delivery of infrastructure will be managed on a site allocation which has already started development but which is not scheduled to start until 2032/33.

4.13 This fails on both the need for clarity and lack of ambiguity under NPPF Paragraph 16(d) but appears not to meet Paragraph 16(c) as well as this is not “effective engagement” with the community represented by Buckingham Town Council.

4.14 In terms of developer contributions, it is questioned whether all the policies of the Local Plan have been considered in the allocation of this site and its ultimate viability and deliverability. It is noted that this site will deliver 10 Gypsy and Traveller pitches: this will require a minimum of 3,200sqm [based on the suggested pitch size of 320sqm in HO7 supporting text at 7.1.40 and the stated requirement in the allocation of 10 pitches]; SE3.1. (d) will require delivery of 300sqm (0.03ha) of community food growing land, separate to other open green space; if the national cycleway is considered part of the Buckinghamshire Greenway, then TR8 will require a contribution from the developer/s; finally Infrastructure Delivery Plan Appendix 1 Infrastructure Schedule estimates a cost of £17.72m (plus a proportion of £4.93m SEND Section 106 costs which cover primary and secondary school). There is no statement to the effect that the projected density of housing can be delivered, when these factors are taken into account.

4.15 It is submitted that this is not positively prepared to ensure that all the infrastructure required by the Plan can be delivered on this site, to ensure that it remains viable, and the housing numbers (given that there is no buffer) remain deliverable, which questions compliance with NPPF Paragraph 36(a) and Paragraph 16(b).

BUC01: Former Inov8 site, Tingewick Road, Buckingham

4.16 This depends on the University's future needs. It is assumed that if the student accommodation is to count towards housing total as is indicated at paragraph 6.321 and footnote then the students would be full-time students who would normally be resident at the University during terms, and thus seek to alleviate the pressure on local housing market. If other use, how would this affect the housing total?

4.17 This site was assessed as follows in the BNDP:

"Suitability of location: Brownfield site within the built up area of the town. The site lies adjacent to the Buckingham Conservation Area and there are non-designated heritage assets further south of the site on Bath Lane and to its north on Tingewick Road. The eastern boundary of the site falls within flood zone 3 which has been excluded from the developable area (27% in Flood Zone 3a as per Aylesbury Vale District Council Level 1 Strategic Flood Risk Assessment). A further 39% of the site lies within flood zone 2 (Level 1 SFRA) and some surface water flood risk recorded on the site. The site was assessed in the VALP SFRA Part 1 (May 2017) as suitable for employment (less vulnerable development), however, as per the made plan allocation of this site and the overall strategy, this plan considers that the site is more suited to residential accommodation (more vulnerable development). The site is therefore subject to the sequential test required by national policy. Given that there are other reasonably available sites in areas with a lower probability of flooding that can accommodate residential development the site is not sequentially preferable in flood risk terms. The site is not subject to an Exception Test as it is proposed to contain more vulnerable development in Flood Zone 2. Whilst the site is not sequentially preferable, it is a prominent brownfield site in the town that is vacant and covered in hardstanding. A development scheme on this site also offers a real opportunity to provide flood betterment. The Town Council has therefore attached substantial weight to the value of using brownfield and underutilised land within the settlement that would include flood betterment. Ultimately however it is understood that the decision maker will need to be satisfied that any future development would be safe throughout its lifetime and not lead to increased flood risk elsewhere. Historic planning applications on the site, for residential development (teacher accommodation) has demonstrated that it is possible to deliver a scheme demonstrating this and a site specific flood risk assessment will still be required at the planning application stage. Mineral Safeguarding Area but does not fall within development exempt from Waste Plan Policy 1 although extraction considered likely to be impractical and not economically viable. Potential for ground contamination to be considered. Its redevelopment as per NP policies should enable SuDS to significantly reduce surface water run-off and provides an opportunity to enhance the setting of the Conservation Area and non-designated heritage assets."

Suitability of Land Use: One of the most prominent brownfield sites in the town on Tingewick Road and a main thoroughfare to the town centre, surrounded by residential development and bordered by River Great Ouse. Benefits from several access on Tingewick Road and Bath Lane. Close to town centre, bus routes, walking and wheeling connections. Raised ground level likely to be required in Flood Zone 2.

Approximate Range of development: Site area: 2.1 ha Site capacity: approx. 3,000 m² building footprint, 8,750 m² gross development area three storey development Housing delivery maximum @ 70m² (three storey building) = 100 flats”

4.18 This is a somewhat lower assessment than the draft Local Plan for market units; the square meterage for student units may be less, and thus more student units could be provided, but it is questioned whether 300 are deliverable.

4.19 Buckingham Town Council supports this policy but is concerned that NPPF Paragraph 16(b) is not engaged and this is more aspirational than deliverable in terms of housing numbers within the Plan period.

Small Sites SMA001: Small site allocations for residential and residential-led mixed use development

4.20 These allocations are to be found in Appendix K and on the Policies Map.

(i) Opus 3263 Bourton Meadow, this is the Canal Site [Policy CLH2 in the BNDP which is referenced].

Developers have indicated to the Town Council that there will probably be up to 90 homes, but Buckinghamshire Council has stated 150 homes for this site. This represents around 60 homes lost from the overall total. Appendix F suggests the start of delivery in 2030/31, developers have indicated at presentations to Full Council that they intend to be delivered by 2029 or thereabouts.

(ii) Opus 1209 Land off Tingewick Road [BNDP HP2 Appendix A Site D]

The Foundry Drive site is stated as 0.56ha resulting in 45 homes. Appendix F suggests delivery between 2029/31. This has recently been the subject of a planning application for 16 homes, and a previous application for the same figure was refused as overcrowding the site. The typography does not lend itself to flats (which might yield the density suggested).

The BNDP HP2 assessment was as follows:

Approximate Range of Development: Site area: 0.38 ha Site capacity: approx. 0.304ha Housing delivery maximum @ 30dph = 9 homes

Suitability of Location: An industrial commercial use site within the built-up area of the town off Tingewick Road. Established woodland around the site boundary. Not within the setting of heritage assets. Within flood zone 1 and a low risk of surface water flood risk recorded across parts of the site. Mineral Safeguarding Area but meets development exempt from Waste Plan Policy 1 (urban area site less than 0.5 ha). Its redevelopment as per NP policies should enable minimal loss of established planting, biodiversity net gain and SuDS to significantly reduce surface water run-off.

Suitability of Land Use: See also proposed redevelopment of Site I. Alongside the recent residential development of Foundry Drive and on Tingewick Road, the area is developing as a residential suburban part of the town. Alongside the allocation of employment land in the southern part of the town the land is no longer considered sufficiently important to the economic growth of the town to warrant protection.

Benefits from existing access from Tingewick Road and in close proximity to the town centre, bus routes, walking and wheeling connections

There is a significant difference in potential delivery of homes: approximately 36. As stated the topography does not lend itself to flats.

The site is deliverable but not at the density suggested.

(iii) Opus 3180 Verney Close Heath[sic] and Library 0.22 ha and 25 homes.

Appendix F delivery 2029/30 – 13. 2030/31 – 12[says 13]

[BNDP HP2 Site C]

The first point is that although the entry in Appendix K states that it includes the Library, the Policies Map shows “The Centre” (formerly the “Red Cross Building”) and excludes the Library Building across the road.

This goes to clarity under NPPF Paragraph 16(d)

SP12.3 “Existing community facilities and local services will be protected. Proposals resulting in their loss will only be supported where it is demonstrated that: a) Equivalent or better provision will be made or; b) The facility is no longer required or viable; read with supporting text 5.147 “The policy also recognises the importance of protecting existing valued facilities”.

It is accepted that the Verney Close Health Centre will be replaced by the Lace Hill Medical Centre (hopefully by the end of this year) and so falls under SP12.3.b. This does not apply to “The Centre” which is run by the local parish church (which does not have a church hall), and offers community coffee mornings and afternoon teas; provides a meeting place for Project Street Life (an after-school club for young people); Brownies and Guides; The Repair Café (a community organisation offering opportunity to give new life to objects that could otherwise be discarded); a local Bridge Club and community choir in the evenings. Following the policy set out in SP12.3 above, there would need to be “equivalent or better provision” to replace this centre to make the development acceptable. There is concern that such a requirement will potentially render this site non-viable, and should be reduced to the area currently occupied by the Verney Close Health Centre [which is allowed for in the BNDP CLH3.C and has previously come forward as a site but was refused at appeal due to then unacceptable loss of community facilities and employment – Planning Appeal 21/00017/NONDET].

This may reduce the number of homes delivered from this site.

(iv) Opus 2855 Wharf Yard 0.6 ha – 20 homes “Development should include a new small scale visitor interpretation centre for a mix of local community uses (Class F1/F2) and associated parking”. Appendix F – Delivery 2029/30 -10; 2030/31 – 10

This area does flood. The site entrance is constrained by Wharf House, a non-designated heritage asset, situated within the Conservation Area. The entrance has an awkward turn onto the Stratford Road. It was not designated as an urban site allocation under HP2 of the BNDP. There will be an interpretation centre for the history of the canal under CLH2 development (Opus 3263 Bourton Meadow) so it is

questionable as to whether a second such facility would be required. A community facility might be accommodated and perhaps linked to the necessary replacement for opus 3180 (Verney Close) above, but that would require both sites to be delivered together. Access would also remain an issue for the above reasons and potential flooding would remain a concern.

(v) Opus 3540 Western Avenue Garages – 0.17 ha = 15 homes Appendix F Delivery – 2029/30 – 7; 2030/31 - 8

Despite requested clarification at Site Evaluation Engagement in March, this site never housed “garages” – this is acknowledged on the Policies Map entry where it is designated as “greenfield”. It is open access green amenity area for the residents of Western Avenue. As such SP12.3 would again be engaged, and an equivalent or better facility provided. If a minimum of 0.17ha would need to be provided, would this compromise the viability of this site? It may also engage SP13 Green Environment and especially NE8: Resisting the loss of existing green space as this would become private garden space upon development but it is not clear that NE8. (a) *“For developments of more than 10 homes,the Green Infrastructure has been subject to an assessment which proves it is surplus to requirements based on the Natural England’s quantitative/accessibility standards. (b)The land does not fulfil a positive contribution in terms of its appearance, landscaping, recreational use or wildlife value” & (e)The Green Infrastructure lost must be replaced by equivalent or better provision following an assessment justifying this need based on applying the AGS standards in Appendix M. The replacement GI will be in the catchment area (see AGS standards) for the GI lost”* would be satisfied to release this site. As noted previously, replacing this land as required by other Plan policies, may well render the site non-viable and non-deliverable.

4.21 It is submitted that several of these sites may well prove non-viable or underdeliver in terms of number of homes. It is also not clear why some of the allocations of the BNDP HP2 & Appendix A have been semi-duplicated but others not mentioned. This does not seem to accord with PPG Paragraph: 006 Reference ID: 61-006-20190723 and may lead to confusion and conflict with NPPF Paragraph 16(d). The BNDP was made in January 2026 after being tested at examination – it would seem to be a ready source of brownfield site allocations.

4.22 Overall comment on SMA001 as it pertains to Buckingham (but with some concerns as to whether this may be reflected in other areas) – the general densities being proposed for sites are not in accordance with a more detailed and independently examined assessment of likely densities in the BNDP. There is inconsistent referencing to policies and allocations within the BNDP which appears contrary to PPG. Concern in relation to deliverability of housing numbers, viability on certain sites and compliance with National Policy Guidance.

Buckingham Town Council expresses concern that similar losses in other areas could significantly reduce the overall delivery of required housing, especially with only a minimal buffer provision, and thus be in conflict with NPPF Paragraph 36(a) and Paragraph 16(b).

5. Development Management Policies

Housing

HO1: Housing Mix

5.1 This would work alongside BNDP HP5.C. Buckingham Town Council welcomes this clear reference to Neighbourhood Plans as a source of evidence for local requirements. There is concern though as noted above in relation to SP1 that this reference may imply that other Neighbourhood Plan policies have no role alongside other policies in the Local Plan. This, of course, would be contrary to PPG [Paragraph: 006 Reference ID: 61-006-20190723].

HO2: Affordable Housing

(i) Failure to adequately provide for assessed needs Paragraph 36(a) potential breach.

5.2 In the Regulation 18 Consultation “draft” publication – Housing Strategy 2024–29 [Appendix 4 p.24]

[<https://buckinghamshire.moderngov.co.uk/documents/s74959/Appendix%20Four%20Buckinghamshire%20Housing%20Strategy%202024-2029.pdf>] & BC HEDNA Executive Summary [Consultation Draft, September 2025] at p.6 [<https://buckinghamshire.oc2.uk/docfiles/102/Bucks%20Local%20Housing%20Needs%20Assessment%20Executive%20summary.pdf>] stated:

“The LHNA has identified a need for 54,100 homes for market sale or rent (60% of the total dwellings) and 35,600 affordable homes (40%)”. This is rounded up from the 35,589 in the calculations in Figure 6 on the same page.

This is now stated as:

“The Buckinghamshire LHNA 2026 identifies an affordable housing need of 33,835 dwellings during the Plan period. This equates to almost 40% of Buckinghamshire’s overall housing need. While typically only developments of ten or more dwellings will be required to provide affordable housing, these form the majority of the planned housing supply, more affordable housing will be delivered on sites within or being released from the Green Belt. It’s considered that a rate of 25% on the housing sites over 10 or more dwellings in the north and central areas of Buckinghamshire, whilst lower than the identified need, will make a substantial contribution to the required total of affordable housing within the plan period and ensure that development is able to contribute to essential infrastructure and remain viable” [paragraph 7.1.13 of draft Local Plan]

5.3 This is presented as an adjusted figure. It is not clear whether 1,754 new affordable homes have been delivered within that time period, or that the initial calculations were incorrect. This should be clarified. It remains that almost 40% of the overall housing need should be affordable.

5.4 From the total of 91,265 it is stated that 75% (68,449 rounded up) will be delivered in the North & Central area with a rate of 25% affordable homes, so this will render 17,112.25 affordable homes.

The remaining 22,816 will deliver 9,126.4 homes at 40% requirement.

The total affordable homes to be delivered will be 26,239 [rounded up] – this is either a deficit of 7,596 or 9,361 affordable homes.

If 40% was used across all areas, then 36,943 [rounded-up] affordable homes could be delivered – this would provide a buffer in case of sites not being viable at 40%.

5.5 The next problematic statement is that “more affordable housing will be delivered on sites within or being released from the Green Belt.” This is part of policy HO2 but currently there are no allocated sites within the Green Belt nor sites released from the Green Belt in the allocations in the draft Local Plan to swell the numbers of affordable homes being provided, so this potential pipeline is cut off, or it is expected that sites will have to come forward within the Green Belt within the plan period. This is at best unreliable on which to assume this will support a lower rate in the North & Central.

5.6 It also ignores the fact that a substantial portion of affordable housing will be delivered in the North & Central Areas, but this may not deliver sufficient affordable housing where it is required. This is further evidence of the point made in relation to SP1 that this draft does not deliver a Local Plan for all of Buckinghamshire.

5.7 The final statement is an admission that this revised policy will not meet the objectively assessed needs of a specific group of people, contrary to paragraph 36(a) of the NPPF. Evidence from the BNDP Area contradicts the assertion that it is not possible to meet this need and satisfy viability concerns.

(ii) Lack of supporting evidence for the change in policy

5.8 There is no detailed justification for the reduction in the North & Central Areas to 25% from 40% in such a short space of time. It is acknowledged that the viability evidence used to support the proposed CIL Charging Schedule for the North & Central Area suggested that there was an issue with viability in the North. The evidence to support this was deemed commercially sensitive and not made available for scrutiny [a response to Ward Councillor Schaefer confirmed that this evidence had not been seen by Council officers either]. This evidence has not yet been tested at the public hearing by the Inspector, and it is perhaps premature to rely on it for such an important policy, which will underdeliver the required affordable housing, with knock-on effects on other policies, particularly in relation to the economy and health.

The failure to extend the minimum requirement of 40% affordable housing to the North & Central Area is not supported by proportionate evidence and is not justified under NPPF Paragraph 36(b).

(iii) 5.9 The minimum rate for the BNDP Area of 35% as opposed to the current Local Plan [VALP of 25% requirement] was upheld at examination in 2025. There is, of course, an opportunity for a developer to show that a development is not viable at any point. Set out below is the justification for the retention of a minimum of 35% for the BNDP Area via (i) above, if not an increase to 40% as originally consulted upon at Regulation 18 stage.

(A) 5.10 Viability: The question of viability in the North & Central area has already been raised in the CIL Charging Schedule Viability Report to justify the proposed lower rates in the North & Central Areas. As the CIL Charging Schedule is not being examined at the same time as the draft Local Plan, it is not possible to say whether a lesser burden of CIL will address any viability issues [again the assumption there was based on 25% affordable homes in VALP but did not consider the BNDP which has required a minimum of 35% since 2015] including the 0% rate on developments of 400+, and thus it could support 40% affordable housing. It has also been noted that the evidence to support this assertion was not made available for public scrutiny nor has it yet passed independent assessment. This is not proportionate evidence and thus not justified under NPPF Paragraph 36(b)

5.11 The following table shows that there has been a consistent delivery of 35% affordable housing in the BNDP Area since [and before] 2015, with no challenges as to viability. It might also be considered the number of speculative development applications currently in the pipeline suggests that developers remain content with this requirement. It is assumed that speculative development is less frequently pursued when profit margins are pared back.

5.12 Table of significant developments in Buckingham providing onsite affordable housing (from s.106 agreements)

Development	Planning Number	Number of houses	Affordable homes number	Percentage
Moreton Road Phase I	06/01809/APP	200	60	30% [before 2015 BNDP]
Lace Hill	09/01035	700 Actual 656	(s.106) – 245 Actual 230	35% [before BNDP]
Foundry Drive	11/02116/AOP 14/02513/ADP	86	14	16% [before 2015 BNDP was made]
Hamilton Place	16/02641/APP	50	18 [14 flats +4 houses]	36%
St Rumbolds	15/01218/AOP 17/04668/ADP	382 Actual 397	134 Actual 139	35%
Moreton Road Phase II	13/01325/APP	80	28	35% [under BNDP by time appeal heard]
Moreton Road Phase III	20/00510/APP	130	46	35%
Osier Way	19/00148/AOP	416	146	35%
(Phase I – Gawcott with Lenborough Parish Council	22/02829/ADP	121	40	33%
(Phase 2	24/01965/ADP	152	60	39%
(Phase 3	24/01966/ADP	134	47	35%
(Phase 4 9 Custom-build + 4 houses on Gawcott Road	24/03816/ADP (9 Custom build only)	13		n/a

Forthcoming commitments/allocations+A18:EA18:E23				
Land behind Wipac/Site Q	23/00178/AOP PL/26/04558/DE	300	105 [79 affordable rent; 26 shared ownership]	35%
Manor Farm	24/03426/AOP forthcoming numbers from the s.106 agreement	Proposed 220	Not less than 35% Potential 77	Not less than 35%
Policy HP3 development at Tingewick Road cemetery	PL/26/04516/OA	Up to 800	Planning statement: 3.5 Up to 35% affordable dwellings will be delivered as part of the overall housing mix, the precise quantum and nature of which will be determined in discussions with the Council to ensure the right mix and tenure of housing is provided to help meet local need. This provision is consistent with the BNDP affordable housing requirement (Policy HP5) and higher than the 25% requirement in the VALP.	

5.13 This is additionally supported by comparison with neighbouring authorities bordering the North. On the basis that areas adjacent to the boundaries of the north of the county may have similar affordability issues to the North, then observing rates there may give an indication of the ability to support higher percentages of affordable homes through assessed need. This is demonstrated in Buckinghamshire Labour Market & Skills Analysis 2025 (at slide 19) – Buckinghamshire's housing affordability factor is 11.7 as opposed to Oxfordshire at 10.3 and Milton Keynes at 8.7 [expressed as y x average earnings]

5.14 Milton Keynes City Council [affordability 8.7]: The current Local Plan rate is 31%. The draft Local Plan now at examination stage, identifies viability areas explained as: "Broadly, these range from the more recently built areas of the city and rural areas where a requirement for 40% of affordable housing can be achieved

(where a significant proportion of our growth is being directed) to Central Milton Keynes and older areas where it is more challenging to viably provide affordable homes so lower targets have been set.” [paragraph 253 Milton Keynes City Plan 2050 Final Regulation 19 Consultation Version] The area adjacent to Whaddon is identified as Viability Area 1 = 40%; Far Bletchley adjacent to Newton Longville is Viability Area 2 = 20% [draft policy HQH2]. Although this policy does not carry significant planning weight as yet, it is suggested that it is prepared on comparable timescale of evidence.

5.15 Cherwell District Council [Oxfordshire affordability 10.3]: The current Cherwell Local Plan 2011-2031 [adopted in 2015] stated that Banbury & Bicester should deliver 30% affordable homes; the Cherwell Local Plan 2042 Regulation 19 Consultation Version retains Bicester at 30% but simply states “significant” for Banbury. Cherwell also has to accommodate the unmet need in Oxford City Council, where the affordable housing requirement is 50%. Given the new EastWest Railway station at Winslow, it is not inconceivable that many people who work in Oxford may seek housing in the North of the county as well.

5.16 West Northamptonshire Council [no data given in the above report]: current South Northamptonshire Local Plan Part 2 2011-2029 Policy LH8: Brackley and Towcester – 40% affordable housing; rural areas – 50% affordable housing. West Northamptonshire Housing and Economic Needs Assessment (December 2025) suggests a range of 25% - 50% [the latter in more rural areas of South Northamptonshire] with a starting point of 40%+ for viability testing.

5.17 This would support the assertion that percentages higher than 25% can be absorbed by developers, and thus increase the supply of affordable homes in the North of the county.

(B) 5.18 Need: Continuing lack of affordability within Buckingham area:

Affordability – salary requirements in Buckingham for lowest house price; average house price & higher end property price. The mortgage requirements are those used by AECOM in the Buckingham Housing Needs Assessment (2023) which formed part of the examined evidence base for the refreshed BNDP.

Example 1 Lowest price – full ownership 1 bedroom flat in Buckingham [Rightmove, July 2026] asking price [sold prices are few and far between in recent months and many homes are reduced in sale price];

Lowest Old Bank House, £136,995 and highest 1 bedroom cluster homes £200,000. Average price over nine one-bedroom properties = £145,665

Less 10% deposit of £14,567

Balance: £131,098 as a mortgage

Taking 3.5 as multiplier of salary requires £37,456.57 as a salary – less than the average salary in Buckinghamshire.

If 2.75 used as a multiplier for joint income this requires £47,672 household income per year.

This suggests that few young people could afford a one-bedroom property on their own, without a much bigger deposit. It may be possible for a couple, where both parties are working but would be dependent on reaching the “average” at a young age.

Example 2 – Average Property

Rightmove states that the overall average asking price was £386,500 and the most frequently sold were detached properties with an average asking price of £515,577.

£386,500 [this would be roughly the higher end of three-bedroom properties]

Less 10% deposit of £38,650

Balance: £347,850

3.5 multiplier of salary: £99,386 salary required

2.75 multiplier of household income: £126,491 household income required

Example 3 – Higher End Property

£515,577

Less 10% deposit of £51,557

Balance: £464,020

3.5 multiplier of salary: £132,577

2.75 multiplier of joint income: £168,735

5.19 The ONS does not produce data for individual salaries at this level, but it does provide data for household income in the Middle Layer Super Output Areas through ONS Annual Survey of Hours and Earnings – Buckingham North with £65,863 gross per year and Buckingham South with £73,674 gross per year – so an average would be £69,768.50. The average household would therefore be able to access a one-bedroom flat, but a three-bedroom family home would not be possible without assistance or a very large deposit.

5.20 Other sources such as Indeed and Wise have interesting data for individual salaries/wages but may not be seen as reliable as the ONS.

5.21 For Buckinghamshire as a whole, the Buckinghamshire Data Exchange gives an average of £39,500 per annum for an individual in 2023, and the ONS Gross Median Weekly Pay gives £712 per week (£37,024 per annum) in October 2025, which may be preferred as more recent and, as a median, sifts out the highs and lows. This would put a single person on the borderline to afford a one-bedroom flat with a 10% deposit, without assistance.

5.22 If economic goals are to be achieved, attractive affordable housing needs to be obtainable for average workers in order to attract businesses to the area. As the key new employment sites are largely located in the North & Central Area, the lack of

affordable homes may act as a deterrent to potential employers. This is especially crucial for the future growth of the Knowledge Arc.

5.23 This demonstrates that proportionate evidence has not been put forward to support this change in policy, and thus does not comply with NPPF Paragraph 36(b).

(iv) Relationship with existing policies with Neighbourhood Plans forming part of the Development Plan

5.24 This draft policy [HO2] states that a minimum of 25% of the North & Central Area housing on sites of 10 or more dwellings (gross) or sites of 0.5ha or more should be affordable. Other areas have a minimum of 40%. Regulation 18 consultation in September proposed a minimum of 40% generally.

BNDP HP5 “All proposals for new housing on sites 1 ha or more (or 25 dwellings or more) should provide affordable housing at a minimum rate of 35%, (subject to viability).”

(i) This could be read as meaning that sites in the BNDP Area of 10–24 homes [or more than 0.5ha but less than 1ha] will require a minimum of 25% affordable housing [under LP HO2], but 25 or more homes [or sites 1ha or more] will require a minimum of 35% affordable housing [under BNDP HP5]. Both policies are, of course, subject to viability.

Clarity could be added here by a similar wording to HO1 referencing Neighbourhood Plans as a source of evidence for appropriate minimum rate. This would be compliant with NPPF Paragraph 16(d) and also Paragraph 16(f), as well as the PPG.

HO4: Accessible Homes

5.25 “1. In order to create accessible homes, sites of 10 or more homes will provide: 25% of all homes must meet the Building Regulations requirement M4 (2) ‘accessible and adaptable dwellings’; and additionally 5% of all homes must meet Building Regulations requirement M4 (3) ‘wheelchair user dwellings’ to be wheelchair accessible, including 7% of affordable homes.”

5.26 It is stated that there is constraint imposed by the Planning Practice Guidance [PPG at Paragraph: 009 Reference ID: 63-009-20190626 not NPPF as stated in the footnote]. This states:

“Where an identified need exists, plans are expected to make use of the optional technical housing standards (footnote 46 of the National Planning Policy Framework) to help bring forward an adequate supply of accessible housing. In doing so planning policies for housing can set out the proportion of new housing that will be delivered to the following standards:

M4(1) Category 1: Visitable dwellings (the minimum standard that applies where no planning condition is given unless a plan sets a higher minimum requirement)

M4(2) Category 2: Accessible and adaptable dwellings

M4(3) Category 3: Wheelchair user dwellings

Planning policies for accessible housing need to be based on evidence of need, viability and a consideration of site specific factors.” [emphasis added]

5.27 The only limitation appears to be evidence of need – viability is considered suspect as there is evidence to suggest that there is no additional cost to a developer but a major cost to the public purse (or individual) if a house has to be adapted retrospectively with grants [Habinteg & Age Concern Home Truths - <https://www.habinteg.org.uk/hometruths/>]. Additionally Policy HO3 would give the opportunity for the developer to demonstrate the lack of viability. In terms of need, looking at UK disability statistics citing Prevalence and Life Experiences, House of Commons Library Briefing Paper, November 2025 [<https://researchbriefings.files.parliament.uk/documents/CBP-9602/CBP-9602.pdf>] reports that 25% of the UK population reports a disability – 48% of which identify mobility as an issue, which increases with age. If mobility is an issue, it might be a concern for an individual that they may have to use a wheelchair at some stage. In addition, people with mobility issues wish to visit friends and family in their homes, which may not be possible. A low percentage of suitable properties will mean less choice on the open market [buying and rental] and/or longer waiting times for suitable social housing in a convenient area. It is submitted that a clearer and more specific wording is adopted in order to produce clarity for decision-making thus ensuring its effectiveness in meeting the need of persons requiring accessible housing in a county which has an ageing population. If there was more provision of M4(2) and M4(3) as standard build, many individuals would be able to continue to live in their own homes, with some support, rather than require specialist housing in later years.

5.28 It is submitted that this policy would be better worded with insertion of “minimum” for each percentage to ensure that it is future-proofed against proposed changes to NPPF to require 40% of M4(2) in order to remain effective over the plan period. This would comply with NPPF Paragraph 16(d)

HO6: HMOs

5.29 “HO6.

a. not create an over concentration of HMOs which could cause harm to residential amenity, such as adversely impacting on local character or causing an excessive impact on the availability of existing parking;

b. be buildings or sites (including any outbuildings) that are **suitable for use as housing** in multiple occupation, with provision made, for example, for appropriate refuse and recycling storage, cycle and car parking and drying areas” [emphasis added]

5.30 It is submitted that this wording is overly vague and non-specific so as to render it not fit for purpose as it is not immediately apparent to users as to what is and is not acceptable and is somewhat subjective in terms of what an “over concentration” might be. There are examples of more specific language to be found in other Local Plans that are perhaps “more user-friendly”. It also only applies to large HMOs [defined as occupied by seven or more unrelated individuals] and thus does not

address the identified issues in the policy and supporting text which can also occur with smaller HMOs.

5.31 It is recommended that the Policy HO6 of the emerging Local Plan should be extended to all HMOs and that a policy of not having a residential home sandwiched between two HMOs, and that no more than two adjacent HMOs should be permitted.

5.32 This aids clarity for decision-makers and leads to greater effectiveness of the policy by adding not only clarity for application but also allows for any future need to use an Article 4 direction. This would then comply with NPPF Paragraph 16(d).

HO9: Rural exception sites

5.33 This would appear to be the policy that would work with HP1.B of the BNDP – “Proposals for development outside of the settlement boundary will only be supported if they accord with development plan policies managing development in the countryside”

5.34 Clarification as to how this interacts with the following HO10 would be appreciated for clarity and effectiveness [NPPF Paragraph 16(d)]

HO10: Windfall Sites

5.35 This policy considers windfall as being unallocated sites generally limited to sites within the settlement area, the default being any settlement boundary defined by a Neighbourhood Development Plan [there are provisions on the absence of such]. This does not address the issue of when that settlement boundary has been breached by permitted speculative development. The Buckingham example would be Manor Farm. Does this simply extend the boundary around the development's own boundaries, or could the settlement boundary be considered null and void as a result, so that the HO10 criteria would then apply? In addition, is the BNDP settlement boundary now effectively extended by the NESS (no other Buckingham allocations would be in this position) to the boundaries within Gawcott with Lenborough Parish Council?

5.36 This will not carry much weight in deciding speculative applications until the Plan is adopted 2027/28 so there is a hiatus until then.

5.37 It is submitted that this policy requires greater clarity on what happens to settlement boundaries in Neighbourhood Development Plans where speculative development has subsequently been permitted beyond the established settlement boundary. This would assist with compliance with NPPF Paragraph 16(d).

6. Economic Development

EC1: Strategic and key employment sites

6.1 Strategic Site – Silverstone Enterprise Zone, related DAD01 policy – Silverstone Circuit & Silverstone Park, Dadford, as well as SP4.

It is again noted that employment for Buckinghamshire residents in this zone is problematic in terms of transport, with no public transport to the site; currently limited active transport routes and a poor directly connecting road between Buckingham as a Tier 2 settlement and Dadford/Silverstone.

Buckingham Town Council submits that this may endanger deliverability of employment in Tier 2 settlement, Buckingham, and the surrounding areas in the North at this strategic site.

6.2 Key sites – Buckingham Town Council welcomes the additional protection given to the Buckingham Industrial Estate, The Swan Business Park and the new employment area of 1.7ha “allocated” in the Buckingham NESS [detailed in Appendix L]. This last site does in fact form part of an existing commitment found in the Planning Appeal APP/J0405/W/24/3348499 for 300 residential homes and 1.7ha of employment land [the land was originally allocated for employment as Site Q in the 2015 BNDP]. There is now a section 106 agreement in place. This document offers less protection to this site as an employment area than EC1. Buckingham Town Council submits that this affects the deliverability of this employment land over the plan period, and clarification should be given as to whether, as a result of the s.106 agreement, this site can be protected under EC1 or whether the s.106 agreement will take precedence (only slightly better protection overall than EC2).

6.3 This needs to comply with NPPF Paragraph 16(d) and overall Paragraph 16(b) in order to be more than just aspiration when taken in conjunction with comments under Policy SP4.

6.4 It is also submitted that the new allocation at Finmere Airfield [TIN02] will have similar issues with no public transport access and limited active transport routes for the surrounding area. This is likely to generate car journeys to access employment.

EC9: Development within Buckinghamshire’s centres

6.5 Buckingham is a “Town Centre” so designated under Policy EC8, as opposed to Aylesbury & High Wycombe as “sub-regional centres”.

6.6 The nomenclature can be confusing as there are boundaries and frontages set out for Town Centres. So as a “town centre” Buckingham has a Primary Shopping Frontage but not a designated Primary Shopping Area. Figure 7 on page 321 of the draft Plan shows a green circle [town centre boundary] and red roads [presumably main roads through the town] – one might derive from this that a primary shopping frontage is that which borders the red roads – sub regional centres have an extra ring showing primary shopping area.

6.7 Ultimately this would seem not to be in conflict with the BNDP relevant policies. The draft Local Plan does not allow sui generis use in Primary Shopping Frontages.

Neither does the BNDP, which permits this in Secondary Frontages; the draft Local Plan does not have a Secondary category.

6.8 Buckingham Town Council submits that this is not in accordance with the PPG: “It is important for local plans to make appropriate reference to neighbourhood plan policies and proposals...” [Paragraph: 006 Reference ID: 61-006-20190723], as it does not include Neighbourhood Development Plan policies here. BNDP EE1 provides more detail on frontages without being in conflict with this policy; clarification of how these policies will work together would enhance this policy. It is assumed that this policy is not intended to supersede BNDP EE1 as there is no justification for it to do so as would be required by PPG noted above. Buckingham Town Council submits that this policy has not made clear how it is in accordance with National Policy, namely PPG [Paragraph: 006 Reference ID: 61-006-20190723] and thus does not comply with NPPF Paragraph 36(d) and Paragraph 16(f).

7. Environment & Design Policies Generally

NE2-10 & NE20-22

7.1 It is suggested that the following is submitted in relation to each of these policies:

Buckingham Town Council supports this policy. The BNDP contains a number of complementary policies including within the Design Code [DLH1]; this was examined in 2025 and made in January 2026, and so can be considered up to date.

However, Buckingham Town Council has concerns that this Local Plan policy is not fully compliant with National Policy in that it does not mention how existing complementary policies in NDPs will co-exist, nor, if it is the intention to supersede them has any justification for so doing been provided as is required by PPG [Paragraph: 006 Reference ID: 61-006-20190723] and thus does not comply with NPPF Paragraph 36(d) and Paragraph 16(f).

8. Transport

TR1: Transport requirements for new developments

8.1 Buckingham Town Council notes the “vision-led” strategy. It submits that this could be delivered more easily, if clear educational infrastructure requirements were stated clearly in site allocations, particularly Buckingham NESS and Winslow NESS to encourage active transport for school children. This is also the case on Turweston NESS for secondary school children who will need to make the journey to Buckingham to attend secondary schools. If infrastructure is not clearly timed to be delivered with first occupation, then it must be aligned so that the proposed five-year support for bus services is utilised when infrastructure is in place, especially schools, otherwise the family multi-drop car trip will be retained, and traffic congestion will continue, and bus services remain unused and be cancelled in the medium term as being non-viable.

8.2 This would ensure the policy is deliverable as well as aspirational under NPPF Paragraph 16(b)

TR2: Transport improvements

8.3 Buckingham Town Council submits that the Policies Map will now need to be updated as regards the Buckingham Southern Spine Route [point 7] between A413 and A421 in light of the planning permission [application 23/00178/AOP (approved on appeal) & PL/26/04558/DE (pending consideration)] granted for the 300 homes and 1.7ha of employment land which now sits over the indicative route. In addition, there is no protection for A421 improvements other than on MK border [point 11], yet the A421 Corridor Study indicates that roundabout adjustments may be needed around Buckingham [see 6.6.8. of the A421 Corridor Study but Infrastructure Schedule Appendix 1 to the Infrastructure Delivery Plan states: “assessed (Series of junction improvements preferred option following the A421 corridor study) See A421 improvements sheet for more information. Partial dualling has been considered as the option most feasible with the greatest positive impact, with dualling between the Bottledump Roundabout and A421 / Coddimore Road / Whaddon Road roundabout.”]. Unfortunately, it does not seem that the aforesaid sheet is part of the Evidence Base presented. It is not clear when these further decisions on the form of improvements to the A421 were taken and on what evidential basis. This fails to comply with NPPF Paragraph 36(b) and is not justified with proportionate evidence.

8.4 For further effective future-proofing, consideration should be given to protecting (i) a route from the A421 to A413 to the east which would align with the Southern Spine Road and junctions, and (ii) The Western Relief Road in Buckingham Transport Strategy [2017], so as to alleviate further through traffic in Buckingham, which will result from the Turweston NESS on the A422 in the direction of Milton Keynes. This would ensure that the policy is positively prepared to meet the area’s objectively assessed needs under NPPF Paragraph 36(a) and to ensure effective delivery of policy during the lifetime of the plan.

TR5: Freight and Logistics

8.5 Buckingham Town Council would support removing more freight from the road, but questions how this is to be delivered as a policy in the north of the county, where a significant proportion of new employment land is being delivered under the Plan. There will be a new passenger service with a stop at Winslow, but East West Rail has only expressed an interest in developing a freight service. There is potential freight capacity on the East West Rail line [<https://eastwestrail.co.uk/planning/environment-sustainability/freight>]. It is not clear at which sites freight could be loaded and offloaded.

8.6 The supporting text does not provide details as to where the freight loading stations would be in the North. This policy cannot be delivered if freight trains merely use the East West Rail line but there are no access points for businesses in this area. This requires more supporting evidence to be deliverable as opposed to aspirational for the North.

8.7 If freight is to travel to a more remote access point, then there must be commitment to bring forward the A421 Study proposals as quickly as possible, to improve the road network if business is to be attracted to the new employment land, especially the key employment areas identified in Appendix L (Buckingham Industrial

Estate, Swan Business Park and the new 1.7ha allocation in Buckingham NESS), which will continue to have poor access to road hubs and ports.

8.8 It is submitted that this policy is not supported by sufficient evidence to ensure delivery within the plan period. Also that paragraph 3.44 “Major infrastructure projects, including East West Rail and HS2, will improve connectivity and accessibility across parts of the county” is misleading, as although East West Rail will eventually do this, there are no access points to HS2 within the county and it will not carry freight and is apparently contradicted by 4.36 “HS2...passes through the county without stopping, creating challenges related to severance.” This goes to clarity under NPPF Paragraph 16(d).

8.9 Buckingham Town Council submits that this policy does not address the objectively assessed needs of the north [NPPF Paragraph 36(a)] and is not justified with proportionate evidence as regards East West Rail [NPPF Paragraph 36(b)]

9. Infrastructure

IN1: Infrastructure delivery

9.1 Buckingham Town Council welcomes the timely delivery of infrastructure, but queries whether this can be delivered. There is concern as to whether IN1.6, which is likely to be invoked in the NESS allocations, is robust enough. Supporting text especially [7.17.4 and 7.17.8] encourage co-operation, but there is little mention of how enforcement will be managed if difficulties occur and co-operation breaks down, which then threatens delivery of major infrastructure. It is submitted that this does not meet the requirements as to clarity under NPPF Paragraph 16(d)

9.2 Buckingham Town Council also considers that a full assessment of whether necessary infrastructure can be delivered in the North & Central Area cannot be ensured without consideration of a CIL Charging Schedule, either before or alongside the Local Plan. It is not possible to appraise viability fully, especially in terms of delivering the required infrastructure to support approximately 68,000 homes as allocated in that area by this draft Plan.

9.3 Buckingham Town Council submits that this policy does not meet the requirements of NPPF Paragraph 36(a) as it fails to ensure delivery of even the minimum requirements of objectively assessed needs, and is not justified through lack of proportionate evidence under Paragraph 36(b)

IN2: Healthcare and education infrastructure

9.4 IN2.3 “Education contributions will be calculated using a robust and up-to-date methodology based on evidence of pupil yield, school capacity and cost of provision, consistent with Department for Education (DfE) guidance.”

Supporting Text 7.18.2 “On-site provision of new or improved healthcare and education facilities will be identified and secured through site-specific allocation policies and/or the Council’s Infrastructure Delivery Plan.”

9.5 Consulting the Infrastructure Delivery Plan Appendix 1 Infrastructure Schedule uncovers the listing of a secondary school for the Buckingham NESS as well as the

Winslow NESS but which did not make it to a specific site allocation, unlike the other NESS sites.

Assigned to the Buckingham NESS are the following:

- (i) Primary School [no form entry information] TBC likely section 106 costs £30.17m plus proportion of £4.93m SEND school place costs (SEND calculations cover primary and secondary school places). It is not clear whether this will still be required in light of planning application pursuant to Policy HP3 of the BNDP [NPPF Paragraph 16(d) – clarity for decision-maker]
- (ii) Secondary School [no Form Entry information] to be provided by developers – potential funding source s.106 & Local Authority; estimated costs: TBC - Estimated S106 cost (£17.72m plus a proportion of £4.93m SEND Section 106 costs which cover primary and secondary school)
- (iii) Healthcare – extension of Lace Hill Medical Centre “To provide appropriate healthcare mitigation to accommodate new population generated, where the facility must be operationally and financially viable”

The proposed expansion of Lace Hill and its cost estimate will be informed by the findings of the pre-project work, which is expected to be funded by developers at their own expense. This pre-project work will need to be carried out before any formal submission of planning applications. The delivery of the "turnkey" facility is expected to be included in any forthcoming S106 legal agreement. The expansion is expected to be delivered prior to the 50% occupation of the planned development Cost £7.8m

9.6 The question here is that there is already one commitment on site for 300 homes; in addition there is another planning application in for 800 homes [which will provide a primary school] – it is not clear how this essential infrastructure will be apportioned and delivered – the planned development is for 4,700 homes, with 2,235 within the plan period. With the commitment of 300 homes and the planning application for BNDP HP3 for up to 800 amounting to a potential 1,100 likely to be delivered well before the phasing estimate of 2032/33, the question arises as to when the 50% will be triggered.

9.7 Other Infrastructure – upgrades to Buckingham “Police Station” classified as “desirable” – the presumption is that this refers to the Buckingham Police Patrol Base at the Swan Business Park

Buckingham Waste Station – Local Authority Capital Project – looking for site “Ideally in the area to the South of Buckingham in proximity to areas of housing to be served and waste management facilities that receive waste and recycling collected. Note location of new infrastructure must be considered in conjunction with existing infrastructure locations and capacity to create an effective network”.

As the site will need to be purchased the assumption is that this is why there is no location as yet – but not clear where this would go with Buckingham NESS to south and speculative applications.

9.8 It is not clear how these infrastructure requirements will be delivered to ensure compliance with NPPF Paragraph 16(b) and not remain as “aspirational”.

Turweston NESS

9.9 Provision of new Secondary School TBC - Estimated S106 cost (£19.33m plus a proportion of £5.38m SEND Section 106 costs which cover primary and secondary school) but noted that “Cross boundary engagement needed with West Northants on this provision as the NESS site is within walking distance of a secondary school in Brackley”

9.10 This is not stated on the Turweston NESS site allocation and it is clear [see comments on the Buckingham NESS site allocation above] that there has been no agreement with West Northants on this, so positive planning would require inclusion of a secondary school on site in terms of deliverability and viability.

Winslow NESS

9.11 Also a secondary school, but not on the site allocation.

9.12 The draft Plan fails to indicate clearly how these infrastructure requirements will be delivered, [NPPF Paragraph 16(b) & (d)]

IN3: Water infrastructure

9.13 The comments made in relation to SP2 Housing strategy should be noted, that there is concern as to how many homes will be subject to Grampian conditions, and how phasing will be matched to potential infrastructure delivery from water companies. This is of concern in relation to the Buckingham NESS site where delivery has started – well ahead of the phasing estimate of 2032/33.

10. Built Environment

Policies BE1–BE5

10.1 Buckingham Town Council supports these policies. The BNDP contains a number of complementary policies including within the Design Code [DLH1]; this was examined in 2025 and made in January 2026, and so can be considered up to date.

Buckingham Town Council has concerns that these Local Plan policies are not fully compliant with National Policy in that it does not mention how existing complementary policies in NDPs will co-exist, nor, if it is the intention to supersede them has any justification for so doing been provided as is required by PPG [Paragraph: 006 Reference ID: 61-006-20190723]. This is especially concerning in relation to the Buckinghamshire Design Code [Appendix J] which often references “local character” – the necessary information about which is often supplied by Neighbourhood Plan Design Codes [e.g. BNDP DLH1 and Appendix C] or policies. BE5 supporting text offers examples: “7.26.4 Buckinghamshire has many distinct and diverse towns and villages with unique cultural heritage, local geology and geography and built form. Local building traditions determine this local distinctiveness through their siting and the use **of local materials and building styles that define its character.**” 7.26.5 There are a wide variety of landscape

character types including the nationally recognised Chilterns National Landscape.

There are also many unique settlement characteristics that take on a particular built form and type of building material. Therefore, designs that may be acceptable in one part of Buckinghamshire may not be appropriate elsewhere.
 "[emphasis added]

The co-existing relation between these Development Plan policies needs clarity under NPPF Paragraph 16(d) and the absence of acknowledgement of existing, non-conflicting policies is at odds with NPPF Paragraph 36(d) & Paragraph 16(f).

11. Social Environment

SE3: Community Food Growing

11.1 Buckingham Town Council supports the general principles behind this policy. It has some doubts as to the deliverability of food growing land on new development SE3 1.(c) & (d) in relation to forward management. The supporting text 7.8.14 does not really give guidance as to eventual ownership and management of these plots and simply requires a "management plan to be provided", and thus the ultimate deliverability of a long-term amenity.

11.2 It is also noted that this is an additional requirement of land, over and above, other green space and queries whether this has been considered in the viability and delivery testing of the affected site allocations.

11.3 Buckingham Town Council is concerned that in terms of National Policy [NPPF Paragraph 16(b)] that this is more aspirational than deliverable unless it is shown to be part of the viability calculations and housing density calculations on site allocations over 50 homes.

SE4: Community facilities, infrastructure and assets of community value

11.4 The potential effect of the application of this policy, in relation to community facilities, on two allocations under SMA001 is detailed above.

12. Climate Change

CC1: Flood risk

12.1 Buckingham Town Council supports policies which reduce the risk of flooding and understands that there is national policy to be followed under the NPPF.

12.2 However, Buckingham Town Council has concerns that this Local Plan policy is not fully compliant with National Policy in that it does not mention how existing complementary policies in NDPs will co-exist, nor, if it is the intention to supersede them, has any justification for so doing been provided as is required by PPG [Paragraph: 006 Reference ID: 61-006-20190723]. This point goes to clarity under NPPF Paragraph 16(d) as well as Paragraph 36(d) and Paragraph 16(f).

CC3: Water efficiency standards

12.3 Buckingham Town Council supports this policy. The comments made in relation to SP2 Housing strategy should be noted, that there is concern as to how many

homes will be subject to Grampian conditions, and how phasing will be matched to potential infrastructure delivery from water companies. This is of concern in relation to the Buckingham NESS site where delivery has started – well ahead of the phasing estimate of 2032/33.

12.4 In addition, Buckingham Town Council has concerns that this Local Plan policy is not fully compliant with National Policy in that it does not mention how existing complementary policies on greywater harvesting in NDPs [e.g. BNDP Design Code DLH1, especially R.2.iv] will co-exist, nor, if it is the intention to supersede them, has any justification for so doing been provided as is required by PPG [Paragraph: 006 Reference ID: 61-006-20190723].

12.5 The latter point goes to clarity under NPPF Paragraph 16(d) as well as Paragraph 36(d) and Paragraph 16(f).

Buckingham Town Council
Interim Full Council
Monday 17th August 2026

Contact Officer: Town Clerk/Town Plan Officer

Response to Croudace Homes

1. Recommendations

- 1.1. It is recommended that Members task the Town Clerk to write to Croudace Homes, in response to their letter of 21st July 2026, making the points in section two.

2. Recommended Response

1. That the Council maintains its position on secondary school provision, noting that if the Manor Farm site delivers 1,500 homes, this would represent over half of all homes planned on the Buckingham NESS during the plan period, so that a need for secondary school provision is likely to arise.
2. That the Council asks for a sports pavilion, or community hub including a sports facility, on the Manor Farm site, notwithstanding its proximity to Lace Hill, given the existing pressure on changing rooms and pitch availability there, using the comparable Salden Park development as a benchmark.
3. That the Council requests multi-use pitches rather than further football-only provision, specifically tennis courts, a cricket pitch and a bowling green, and confirms its willingness in principle to take on ownership and management of new facilities, or to support engagement with local sports clubs instead.
4. That the Council queries the land shown for a care home, noting the existing care home at Lace Hill and that provision may already be sufficient, and suggests this land be reallocated to other community use.
5. That the Council confirms the only safe connection to the Green Ring is via the existing Pegasus crossing on the A421; sets out two viable onward routes, namely north via the bridleway to a further Pegasus crossing on the A413 behind Osier Way, or via the Bernwood Jubilee Way behind Lace Hill Academy; and asks for the existing wildlife buffer to be retained, with an additional outer buffer, to preserve separation between the Manor Farm and Bloor sites.
6. That the Council flags the central spine road as its principal outstanding concern, both as a barrier to integration and because it would require primary school children to cross it to reach sports facilities or the Green Ring, and asks Croudace to consider how this might be mitigated.

7. That the Council recommends early engagement with Buckinghamshire Council on the route of the Buckingham Southern Spine Road through the NESS, since the originally indicated route is no longer achievable, and suggests a single roundabout junction on the A413 as an alternative.
8. That the Council commends continued reference to the Buckingham Design Code.
9. That these comments are made in the spirit of early engagement and should not prejudice any formal future response from Buckingham Town Council for example at the point of a planning application.

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21st July 2026

Cllr. Fran Davies
Mayor
Buckingham Town Council

By Email Only

Dear Cllr. Fran Davies

Land South East of Buckingham

Thank you for giving myself, and my colleague Andy Somerville from Nexus Planning, the opportunity to present to you and the rest of the Town Council a couple of weeks ago.

I thought it would be helpful to follow up on some of the points and questions raised following our presentation, as well as to re-iterate the advice we are seeking from the Town Council to inform our proposals.

STW works capacity / water supply: our nearest STW is Buckingham and we will shortly be submitting a capacity check and engaging with Anglian Water to understand its position with regards to capacity. Through this process we would seek assurances that there is sufficient water supply available.

Water detention: water will be detained on site using flow controls, which are likely to be hydrobrakes, alongside attenuation features such as SuDS basins and other features.

Secondary School: the lack of secondary school places is clearly an issue in the town. Since we met last week, Buckinghamshire Council has published its Regulation 19 Local Plan ahead of it being considered by various committees. You will no doubt be aware of the proposals for strategic growth to the south / south west of the town, which includes a secondary school. Given two secondary schools are unlikely to be warranted, our proposals would make a financial contribution towards this, based on the number of pupils our site would generate.

Community Hall: we were pleased that Councillors were supportive of our proposals to include a community hall and noted the range of groups that could use it. If there are specific groups you are aware of, we'd be pleased to receive their contact details so we can tailor our proposals to suit their requirements. Elsewhere we are proposing a bespoke facility for a local archery group, but I have also worked with Scout groups to provide them with new facilities.

Integration: we have shared the Councillors comments about the importance of the sites around the town being integrated and not dormitory estates. By providing a range of supporting uses, for example a neighbourhood centre and sports and community facilities, we are confident that these will become the heart of the new community, and can be made available for existing residents and those from the Bloor development to our north. With regards to walking and cycling from the site to the town centre and other key facilities, our transport consultants will be undertaking an audit in the following weeks of the existing routes and identifying where improvements could be made. We can share the results of this if that'd be helpful.

With regards to matters which we would appreciate your views on, we would ask you the following:

- i. **Lace Hill Sports & Community Centre:** as part of our proposals, we will include additional sports facilities. It would be logical for these to complement the existing facilities, so would the existing sports centre benefit from additional facilities? For example, we are aware that there is a shortage of tennis courts in the town. Or is pickleball preferred? If these were located close to the existing centre, would the Town Council be interested in managing them?
- ii. **Buckingham Green Ring:** this runs alongside our site and then through its southern part. We are aware that a section of it is being upgraded as part of the Bloor proposals, so it would be good to understand what your aspirations are for the route that crosses our land.

Thanks again for your time. We look forward to working collaboratively with you as we develop our ideas for the site. We would like to come back and meet with the Town Council, perhaps prior to our planning application being submitted later in the year so we will be in touch to arrange that.

Yours sincerely

For and on behalf of Croudace Homes Ltd



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