



29th October 2025

Draft Local Plan Consultation,
Planning Policy,
Buckinghamshire Council,
Walton Street,
Aylesbury,
HP20 1UA

Dear Sirs

**Ref: Draft Local Plan for Buckinghamshire
Whaddon Parish Council response to Regulation 18 consultation
October 2025**

INTRODUCTION

Whaddon Parish Council (WPC) recognises the thought that has gone into Draft Local Plan (hereafter referred to as the Plan). We also acknowledge the constraints that Buckinghamshire Council (BC) operates under, including stretching targets for new homes, (that are 43% higher than previous housing needs calculations) placed upon it by the Government, which many observers recognise are highly unlikely to be achieved – especially if they are to be supported by necessary and crucial hard, soft, physical and social infrastructure.

We have a number of concerns and other matters to raise, listed below.

LOCAL PLAN OBJECTIVE 2 (b & c).

b) WPC believes that whilst the north of the county may provide fairly easy options for development proposals, because of its general lack of nationally important landscape protection policies, this must be balanced by accepting and understanding that the transport infrastructure, through lack of investment over many years – especially the A421 and A413 – are not safely capable of accepting further growth without considerable infrastructure improvements, and that in the absence of such investment then initial major growth should be located close to established and new railway stations, or where existing highway capacity at peak times is available.

c) Design of new developments alone is unlikely to prevent the risk of ‘climate extremes’, which are unknown, and previous 1 in 100-year events solutions have known to have failed as predictions have been proven wrong in both timing and scale. It would be sensible where alternatives exist, to avoid building in any runoff catchment areas that place flood risk to any towns, villages and hamlets downstream of major development. As stated in the supporting text, the far north and west of Buckinghamshire (around the edges of Milton Keynes), is recognised as being at risk by cumulative levels of growth. WPC believes that simply building in water retention features will not solve the potential problems and agrees that only sites with the lowest possible flood risk should be considered first, because those sites needing built in flood mitigation and prevention can never guarantee that downstream flooding will never occur. This is particularly relevant to all those areas in north Buckinghamshire where water run-off naturally flows into any tributary of the River Great Ouse, further impacting on areas of flood risk including Calverton, Stony Stratford, Buckingham and further afield at Newport Pagnell etc.

LOCAL PLAN OBJECTIVE 3. Planning for new housing.

The current Local Plan to 2033 calls for 25% affordable housing. But it is noted that the new Local plan will call for 40% affordable housing. If BC can consider changing and implementing historic S106 arrangements to CIL in old legacy council areas, then why not the percentage of new affordable housing, especially on sites where no planning consent has yet been issued (Shenley Park being one example). Considerable weight should be given to the emerging Local Plan and especially as the draft Buckinghamshire Local Needs Housing Assessment (LHNA) 2025 identifies an affordable housing need of 35,552 dwellings during the Plan period which equates to 40% of Buckinghamshire’s overall housing need. BC may argue (as will impacted developers) that the current Local Plan takes precedence - but it's an urgent issue that should be addressed now whilst the need is proven, and more affordable homes are urgently required.

LOCAL PLAN OBJECTIVE 6. Planning for Infrastructure.

This aim is not only fully supported by WPC and no doubt the residents of the Whaddon but is considered to be one of the most important issues that should be addressed, especially in terms of highway improvement, safety, and traffic volume issues which, due to new development are the blight of many communities. It seems totally unfair that whilst new developments are designed with safety in mind – 20 mph zones etc. - the nearby communities that have to endure the increased traffic from major developments, receive little or no improvement in their local infrastructure to make safer and healthier places to live. Aim c. is also of critical importance, although the aim should be to ensure that certain infrastructure should be in place either before or during the development – as required by conditions – as opposed to ‘at the right time’, because there are far too many examples of necessary infrastructure being delayed or unmet by developers. In this way, penalties could be introduced to ensure that new and existing residents are not impacted by lack of physical and social infrastructure.

LOCAL PLAN OBJECTIVE 8. Planning for Transport.

WPC whilst fully supporting this objective would like to understand what is meant by ‘severe highway impacts’, mentioned in para 2 of the text, in relation to whether developments can mitigate the impact of increased traffic and movements. It would be

helpful for residents to fully understand this point, because taking the A421 as just one important example, those having to use this route already consider that ‘severe’ conditions and concerns already exist, especially at peak travel times, and that insufficient is being done for developments to mitigate problems of their making (as opposed to dealing with historic growth issues, which should be a point of consideration at the point of a planning application being submitted).

COMMENTS ON LOCAL PLAN SPATIAL STRATEGY.

Housing:

Approach 1. Brownfield.

BC states that it aims to maximise delivery of brownfield sites. WPC applauds this approach but asks for more ambition in its delivery. The proposed numbers target 1,500-2,500 new homes which represents as little as 1.6% of the 95,000 total (including buffer).

This consultation response is not the place to identify specific brownfield sites, but we ask that BC devotes more resources to exploring brownfield opportunities.

Approach 2. Growth on the edge of existing main towns.

Whilst understanding that this approach focuses on tier 1 and 2 settlements, the plan should recognise the importance of Winslow as a tier 3 settlement, which has the benefit of a new railway station. This omission however may be better promoted within the Transport Hub Approach – where again Winslow is not specifically mentioned, and where targeted rail related growth to the north of the town would be beneficial and could help reduce pressure on certain road infrastructure.

Approach 3. New Towns.

As the New Towns Taskforce has not specifically mentioned any proposed sites in Buckinghamshire, the plan should make it clear that any new town allocation, that might be promoted by BC will form part of the 69,000 new home requirement and will not be in addition. The draft plan mentions that Bucks may need up to four New Towns – perhaps each providing up to 3,000 homes each (of the 10,000 likely total) within the plan period to 2045. This strategy requires further clarification if it is to be pursued, as does the comment in the accompanying text that states “could lessen impacts on existing communities in the long term”. What impacts exactly, and what is meant by long term?

Approach 4. Development at Transport Hubs.

See comment in Approach 2 above. Transport Hubs for public transport includes new rail stations, but the importance of Winslow is not specifically mentioned. There is a brief mention of Winslow at paragraph 8.45 (East-West rail) in the Baseline Transport evidence, but the importance of this new station is not explained, nor is the possible link to Aylesbury, which if taken further could open strategically important areas for further major growth.

Approach 5. Expansion near key employment areas.

This approach seems logical and sensible – thereby avoiding unnecessary travel to work by any other means. Without fully understanding the complex analysis within the Employment Land Review, it is very difficult to accept that the seemingly very low figure of just 5-6,000 homes could not be substantially increased, bearing in mind the benefits that flow from lower and shorter travel to work times, in not just sustainability terms but also environmental and health terms.

Approach 6. Limited expansion of villages.

Whilst WPC does not object to this approach, which was considered but not implemented in the current adopted plan, this council specifically objects to the suggested blanket approach. Given that affordable housing is generally delivered as part of a larger mixed development scheme, we believe that villages in a situation such as Whaddon should be excluded because the Parish is already expected to accommodate up to 1,265 new homes at Shenley Park, some 25% (316 units) of which will be affordable homes.

Approach 7. Expanding urban areas on the edge of Buckinghamshire.

WPC also understands why this approach is being pursued, and whilst both the advantages and disadvantage are recognised, both councillors and residents require detailed explanation and clarity on exactly what is meant by “Will require joint working with neighbouring authorities (*in WPC’s case – Milton Keynes City Council*) which could make the implementation of sites more difficult, e.g. compelling them to enhance transport infrastructure”. It is not simply ‘transport infrastructure’, but everything else that will occur when new residents of adjoining major sites identify themselves with the new City, rather than Winslow, Buckingham or Aylesbury, in Buckinghamshire and where such developments are policy driven by MKCC Local Plan policies rather than BC ones. Compelling MKCC to enhance infrastructure seems slightly ambitious, when it is surely BC’s and the developer’s primary responsibility to ensure development is placed in areas, where they cannot be held to ransom by adjoining authorities.

ADDITIONAL POINTS

Existing plans

As the Plan states, “Buckinghamshire already has just over 22,000 homes committed for development from existing local plans, neighbourhood plans and planning permissions. This leaves an outstanding figure of just under 69,000 new homes needed to meet our future housing needs for Buckinghamshire”. It is therefore important that the impact on local areas of any further development recognises those already in the pipeline. In particular, we believe small communities should not take a ‘double’ hit from developments which were initiated in the current Plan period (including for the predecessor authorities of BC) and those which will be brought forward in the new Plan period.

Similarly, we call on the draft Plan to recognise the type of development in the existing pipeline as well as the quantum. This includes the proportion of affordable new homes. For example, it is suggested that Whaddon might provide some 33 affordable homes (Annex A of Buckinghamshire Local Housing Need Assessment).

Conservation

We support the Plan's aim "to conserve and enhance Buckinghamshire's valued natural, historic, and built environments, to ensure they are protected from inappropriate development."

As part of this it is vital to include the range of environments that Buckinghamshire enjoys which deserve conservation. For example, the Whaddon Chase is an Area of Special Landscape Interest. These should be specified in this aim of the Plan, alongside Green Belt and SACs.

Infrastructure

We support the Plan's aim "to ensure the right infrastructure required to support communities is provided in the right place and at the right time, and make best use of existing infrastructure."

However, we believe a sound Plan would recognise the reality of how this aim is currently implemented (or rather not adequately implemented) in practice. We draw attention to the failure for adequate provision of transport infrastructure to be provided for in the context of the Salden Place and Shenley Park developments and their impact on the A421.

Furthermore, to become a reality this aim must be backed by adequate resourcing and appropriate capability. BC has recently rejected its transport modelling on the A421 in favour of that undertaken by MKCC. Given this, and the absence of optioneering for the traffic impacts that will result from Shenley Park, we believe the Plan should cover in more detail how BC will set itself up to deliver this aim in more practice.

It is regularly stated by both the highways department, officers and members that developers of major development sites cannot be expected to correct historic issues and should only mitigate the impacts of their new development. Whilst understanding the principle of such statements, WPC believe that existing (i.e. historic) conditions such as congestion and safety at peak times along the A421, must be considered as an essential component of any major development, and if traffic arising from such major development impacts on current conditions, then the developers must - at least as a minimum - contribute to any necessary improvements, ensuring that the impact of their development does not worsen the existing conditions, or those of nearby communities that may be impacted. The developers should have undertaken - as a duty of care - appropriate investigation prior to submitting any planning application, and the accompanying traffic impact assessment must be thoroughly scrutinised and tested by a specialist and fully independent transport company, as opposed to just the Local Authority Highways Department, whose independence must be questioned, as part of the decision-making authority. The appeal at Salden Chase, brought about by MKCC members challenging their officers' recommendation, clearly highlights this problem - and the decision finally passed down by the Planning Inspectorate highlights the chasm between developer and Local Authority appropriate modelling and decision making.

Coalescence

We are disappointed that the avoidance of coalescence is not an objective of the Plan. This casts a shadow over every settlement in Buckinghamshire that currently enjoys its own spatial identity. While the prospect of coalescence is recognised as a drawback of Approaches 2 and 4 it is not given sufficient emphasis. This is an issue which should be rectified, and a clear and understandable explanation of what coalescence means in practise is necessary.

Consultation

The current timetables for the Plan and the HELAA do not give us comfort that meaningful consultation will be undertaken before sites are put forward for development in the emerging new Local Plan. If meaningful consultation on proposed sites is not allowed for over the next year, then it will undermine the Plan for its whole duration.

This is a critical period for engaging local communities, as is required in the revised NPPF. While the draft Plan provides a useful start it is not sufficient and we urge BC to, firstly, plan for meaningful consultation over the next year, and secondly, gives as much detail as soon as possible on the forward timeline.

Neighbourhood Plans

Production of a new Neighbourhood Plan is bordering on cost prohibitive for a small Parish such as WPC, all the more so now that Government has withdrawn funding for their development.

Given this, we believe it is unfair that if a parish has a 'made plan' then it gets 25% or the CIL revenue generated from major developments to invest locally, but if not then that percentage reduces to 15%. We do not believe this disparity is justified, when major developments are forced within small parishes.

If this is to remain the position then BC should enable the production of more Neighbourhood Plans through grant funding to offset the cost. This would demonstrate a commitment by BC to greater neighbourhood involvement and come at what would for BC be a relatively small amount of investment. We do expect that neighbourhoods such as WPC should still part fund these plans.

Thank you for your kind attention to this submission; please do not hesitate to contact WPC if any clarification or additional information is needed.

Yours sincerely

Suzanne Lindsey

Clerk & RFO Whaddon Parish Council