Regulation 19 feedback on the Draft Local plan for Buckinghamshire

To:

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For the attention of:

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A. Introduction

1. This document provides the response from the Long Crendon Parish Council (LCPC) and the Long Crendon Neighbourhood planning steering group (LCNPSG) to the Regulation 19 consultation on the draft Local plan for Buckinghamshire 2045. We have not used the OPUSconsult portal as it appears to not provide the functionality to handle the wider feedback we have made below.
2. The Long Crendon Parish Council (and associated LCNPSG) are aware of the development needs of the County and are keen to work with Buckinghamshire Council and play an active part in providing a deliverable and realistic contribution to the Local Plan, but there are areas of the draft Local plan of relevance to Long Crendon where our local knowledge and data points should outweigh the desk analysis done so far in creating the Bucks Local plan.
3. We have been working over the last 2 years gathering feedback from the residents and talking to the actual site developers to bring local knowledge, and specific experience of living in the village to bear on the areas that the Bucks Local plan seeks to apply to our community. The feedback below is based on this work.
4. We hope our comments on this regulation 19 consultation will be seen as a constructive and valuable input that can contribute to the needs of Buckinghamshire in a manner that also works best for the village and its residents.
5. We would be pleased to clarify and explain any of the points in this document, and request that this document is submitted in full alongside the plan. We also request participation in the any hearing sessions as part of the examination of the Bucks Local Plan.
6. The key points we wish to raise are summarised in section B below, with more information provided in the detailed parts of section C. We have also included some

excerpts from our previous HELAA consultation comments in section D, since these are still relevant.

B. Summary of Key Points

B.1 Consultation process and execution

1. There appear to be significant omissions in the consultation regarding the evidence base and the actual specific feedback provided during the previous HELAA consultation.
2. Only a summary of the themes in the consultancy feedback has been included, but not the individual specific comments that were submitted, and whilst commenting on these themes is useful, there are specific previous comments from Long Crendon Parish Council (and a number of other responders) that appear not to have been taken into account or only partially addressed, and there is no explanation of the reasons.
3. This means we do not have sufficient information to judge how effectively or otherwise this consultation addresses previous comments.

B.2 Site allocations

4. One specific comments that we raised in the HELAA consultation was on the flawed methodology used to assess sites, leading to questionable site allocations (specific details here are on the arbitrary and unspecified use of landscape harm and settlement pattern as well ignorance of the prior rejection of the Chilton Road site). The failure to address this specific comment means that we
   - believe these remain valid and request that they be addressed more thoroughly. Rather than being but folded into generic top-level responses.
   - must question the assertion that the HELAA sites should be a fixed part of the evidence for the plan and should not, themselves, be open to consultation or comment.
5. We question the overall allocations of housing numbers and their proportionality:
   - What is the status (and reasoning behind) these 'proposed allocations'?
   - The proposed target of up to 315 new houses for Long Crendon would appear to be out of all reasonable proportion to the existing village size, representing approximately a 30% increase. This appears contrary to the SP2 Housing strategy policy which notes that for Large Villages (like Long Crendon) 'growth will be at a scale in keeping with Local Character and setting' and also appears incompatible with the strategic approach 6 noted in the draft plan of 'Limited expansion of village' (noted in para 5.19 of the draft Local plan;
   - In many cases these proposed allocations differ from previous views, for example the Chilton Road site OPUS 653 is allocated for 100 houses yet previous assessments have limited this to 65[1]
   - These numbers could be very different once local knowledge factors such as topography, infrastructure support and their spatial distribution in the village are

[1] See Section C.2 for further comments

considered as part of the Neighbourhood planning work to develop the best outcome for Long Crendon and the surrounding area.

- There also appears to be no consideration of the cumulative effect of proposed sites, whilst one site may stretch the existing infrastructure (such as water supply or road capacity) the combination of them could well overwhelm the existing infrastructure and require significant upgrades that are not covered in the infrastructure delivery plan.

B.3 Deliverability and utility dependencies

6. The soundness of the deliverability of the plan and its timing (included in appendix F on Housing trajectory) should **at best be highly caveated** and **ideally spelt out further** because of critical dependencies on the provision of utilities infrastructure.
7. It is assumed that the utility companies will meet these dependencies in a timely manner but there are no concrete plans in place to do so, and significant questions of the availability of funding and resources to do so. In particular, water and wastewater infrastructure that is already at its limits in a water stressed area, where there is a lack of any currently credible defined Thames Water plans to address current shortcomings and provide expansion to meet the future growth requirements.

B.4 Deliverability and other infrastructure dependencies

8. In a similar manner the soundness of the deliverability of the plan and its timing (included in appendix F on Housing trajectory) should **at best be highly caveated** and **ideally spelt out further** because of a lack of detail on key dependencies on the provision of other (no-utility) elements of infrastructure, such as transport and travel infrastructure (for vehicles, cycling and walking), school capacity, and healthcare capacity.
9. The Infrastructure Delivery Plan lists many projects with no funding or firm start dates attached to them
10. The Phased delivery assumptions (implied by the numbers in appendix F on Housing trajectory) also seem unrealistic since they do not reflect the staging on how landowners will sell parcels of land or how developers will typically build out sites.

B.5 Collaboration between the Local Plan for Buckinghamshire and the Neighbourhood Plans

11. There is a lack of any commitment or acknowledgement of the part that both extant and developing neighbourhood plans will play to ensure local knowledge and details are suitably accounted for and are collaboratively used to restore/maintain/increase trust and confidence with local communities, especially as further details emerge.
12. We therefore suggest the addition of a clause to the Local Plan for Buckinghamshire that allows for the responsive collaboration and inclusion of input from our neighbourhood planning process once completed to guide site allocations, flesh out local policy details and help refine infrastructure requirements and delivery plans.
13. We believe that this amendment applies to all villages undergoing this process, not just Long Crendon.
14. We feel that in developing our Neighbourhood plan for Long Crendon we are in a very good position to bring to bear:

- A deep understanding of the constraints and possibilities of each site
- suitable inputs from consultations with landowners, developers and the community (including amenity provision, site layouts, mix of housing types, and environmental impact)
- detailed local knowledge,

to create a plan for the Parish that fits within the Bucks local plan policies, gives the best outcome for the Village and has the benefit of buy-in from local residents. We have already had positive meetings with the neighbourhood planning liaison team at Bucks and we look forward to continuing that constructive dialogue.

15. Section C.5 (Our approach to developing the Long Crendon Neighbourhood plan) provides further detail on our approach and progress to date.

B.6 Specific Policies

16. In general, we agree with the approach of the creation of the set of policies in the Draft Local plan and for the most part have no specific comments on them, however there are some points on selected specific policies as follows.

- We welcome the references (in Policies SP4 and LOC02) to the expansion of the Land off Drakes Drive for office and industrial development and complimentary leisure uses, providing this is designed to ensure safe and suitable access, including by walking, cycling and public transport.
- We note and welcome the policy that aims to ensure that communities have access to a comprehensive range of community facilities and local services (Policy SP12) but also note that the Infrastructure Delivery Plan makes no mention of projects and provisions to provide a primary healthcare centre or additional school places in Long Crendon to support this.
- We agree with and support the policy SP14 on “Placemaking and Design” but can find no information on how this will be applied to specific sites and the implications for those proposed for Long Crendon. We would like to see more details on housing types and layouts, interconnectivity especially by walking and cycling both within the village and to Thame and Haddenham rail station. We intend to include our own policies for these elements in our new Neighbourhood Plan.
- We also support the policy SP16 on “Healthy communities and tackling health inequalities” but with similar concerns about how it will be applied and what it would mean for villages like Long Crendon.
- We welcome the general policies HO1 on “Housing mix” and HO2 on “Affordable housing” but note that we are doing our own more detailed Local Parish Housing needs assessment to determine if there are any specific differences in requirements for the Long Crendon Neighbourhood plan.

C. Detailed Comments

C.1 Consultation process and execution

1. The evidence base is missing the actual specific feedback provided in the HELAA consultation, instead it relies on a summary of the key themes that Bucks have derived from these. Without including the original responses, we are unable to discern if these summary themes are correct.

2. By only including the summary themes (covered in Appendices 2 and 4 in the site engagement responses) important key detailed comments and responses to them have been omitted (or bypassed), questioning the extent to which the consultation has been effectively carried out.

3. In particular, the Long Crendon Parish Council submissions on the HELAA review included comments on:

   - The HELAA methodology (see D.1 Comments on the HELAA methodology), which seem to have been bypassed through this 'themed' approach) and;
   - The level of implied additional housing for the Long Crendon Parish (see. D.2 Comments on the level of implied additional housing arising for the Long Crendon Parish), which at best have only been partially addressed.

4. There is no mention of the HELAA consultation responses made by Long Crendon Parish council/Neighbourhood planning group (see Appendix 4 in the list of site engagement responses) and the Long Crendon Community (see Appendix 2 in the list of site engagement responses) though some of other bodies are included more than once in the lists of respondents (e.g. Beaconsfield town, Burnham Parish, Chalfont St Giles parish, Chepping Wycombe parish, Maids Moreton Parish, and North Marston Parish councils) – which begs the question of how accurately these have been compiled.

C.2 Site allocations

C.2.1 General

5. We note that the HELAA states that 'The HELAA sites are part of the evidence for the plan and are not, themselves, open to consultation' though our previous comments (and those of others) made as part of the HELAA consultation have not been specifically addressed

6. The specific comments that we raised in the HELAA consultation on the flawed methodology used to assess sites (see D.1 Comments on the HELAA methodology), have not been specifically addressed[2] consequently:

   - We believe these remain valid and request that they be addressed more thoroughly. Rather than being but folded into generic top-level responses.
   - The assertion that the HELAA sites should be a fixed part of the evidence and should not be open to consultation is questionable.
   - The site allocations themselves are questionable (due to assessments citing unspecified use of landscape harm, unacceptable intrusion into the open countryside, out of character and settlement pattern as well ignorance of the prior rejection of the Chilton Road site[3] to arbitrarily justify suitability or unsuitability).
   - The Local Plan assessment of this site is inconsistent with others in the HELAA on landscape harm and several other points. Several of the comments made against this site to justify its "unsuitable" rating apply equally to other sites around the village.

[2] Other than with the comment that 'The Council has undertaken a HELAA in line with the Planning Practice Guidance' which makes no mention of such factors has landscape harm and settlement pattern.

[3] Bucks County Council has successfully defended against this development on this site twice at appeal in the last decade, yet it is now allocated for 100 homes

For example: out of character, settlement pattern, unacceptable harm on landscape and unacceptable intrusion into the open countryside. There appears to be no justification why these comments have been applied to some sites and not others.

7. Appendix F to the Draft Local Plan includes the phrasing 'proposed allocations' without defining what is the exact status of this or the reasoning behind it. Is this alterable? and if so, by who and in what circumstances. This needs to be clarified.
8. In many cases these proposed allocations differ from previous views, for example the Chilton Road site (OPUS 653) has a proposed allocated for 100 houses, yet previous assessments have limited this to 65
9. These numbers could be very different once local knowledge factors such as topography[4], infrastructure support and their spatial distribution in the village[5] are considered as part of the Neighbourhood planning work[6] to develop the best outcome for Long Crendon and the surrounding area.
10. We note[7] the downward revision of the potential/proposed allocation for Long Crendon from the previous 418 dwellings in the previous consultation version of the HELAA (102 Chilton Road, 273 Madges and 42 College Farm), to 315 (100 Chilton Road, 100 Madges and 115 College Farm) in Appendix F to the draft Local Plan, but this would still appear to be out of all reasonable proportion to the existing village size, representing approximately a 30% increase. This appears contrary to the SP2 Housing strategy policy which notes that for Large Villages (like Long Crendon) 'growth will be at a scale in keeping with Local Character and setting' and also appears incompatible with the strategic approach 6 noted in the draft plan of 'Limited expansion of village' (noted in para 5.19 of the draft Local plan;
11. It remains far from clear if these allocations are realistically sustainable and deliverable due to the constraints or the strains that this would put on existing road and Sewage Treatment infrastructure[8], current school places, healthcare and other village services
12. We believe that such numbers should be refined based on specific aspects and constraints of the sites concerned, such as topography; drainage/flood risk issues; heritage issues and; roads, cycleways, walkways and utilities infrastructure support/capacity, which would be best determined as part the neighbourhood planning

[4] In line with guidance of the Design code associated with the plan (Appendix J)

[5] The three currently allocated housing sites in Long Crendon are all located at the extreme north-east corner of the village, which limits the support for connectivity across the village as a whole and would impose a large construction area on residents of Chilton and Chearsley Roads during development and have severe impacts on the village school.

[6] We believe that we have important local knowledge and understanding of the various sites to be considered as well as other associated matters. This can make an important contribution to developing the best outcome for Long Crendon and the surrounding area and should, therefore, be considered and incorporated

[7] Given our previous comments (see D.2 Comments on the level of implied additional housing arising for the Long Crendon Parish

[8] Sewage being especially relevant here as one of the cited in the HELAA methodology's list of physical constraints that should be considered in the initial survey stage and the fact that the Bucks Sustainability Appraisal Note (section 14) notes that the Long Crendon Sewage works has limited capacity for further growth in the local plan period

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process (see. Error! Reference source not found., Error! Reference source not found.) and revisions during specific planning applications

13. There also appears to be no consideration of the cumulative effect of proposed sites, whilst one site may stretch the existing infrastructure (such as water supply or road capacity) the combination of them could well overwhelm the existing infrastructure and require significant upgrades that are not covered in the infrastructure delivery plan.

C.2.2 OPUS 653 Land off Chilton Road

14. Bucks County Council have successfully defended against this development on this site twice at appeal in the last decade, yet it is now has a proposed allocation for 100 homes (up from the 65 originally applied for), leading to questions of what has materially changed to justify allocating it now, when other sites could offer more benefit to the village.

15. Despite the comment above, the Long Crendon Neighbourhood Planning team are in active discussions with the land promoter of this site, and there are several factors that will impinge on the proposed allocation of 100 dwellings, including:

- The topography of the site, where we would wish to restrict houses being built at the top of the site as harming the landscape and views (a factor that was used in the Initial HELAA consultation to rule out other sites!)
- Potential drainage issues from the site, where mitigations would restrict the areas of the site that can built and consequent numbers of dwellings
- The current limited and potentially dangerous access to the site from Chilton Road, where mitigations are likely to require some of the site to be used to widen the road and provide footpath access and cycling routes which in turn would impact the number of dwellings that could be built (these road, cycling and footpath infrastructure items are not included anywhere in the projects in the infrastructure delivery plans that support the draft Bucks Local Plan)

C.2.3 OPUS 5000 Site

16. There is an error in the HELAA maps regarding College Farm, in that it refers to College Farm Parcel 2 (site 5000) and notes that this has now been combined with College Farm Parcel 1 (site 4993), but the new combined site is not depicted correctly on the map.

17. As with other sites, the HELAA assessment of this site is inconsistent with others in the HELAA on landscape harm and several other points (see section C paragraph 6).

18. Whilst this site has the potential to be suitable, there are still factors that need to be considered before it could be deemed as such, in particular

- Traffic impacts - the site adjoins the same Chearsley road as OPUS 377, where it was noted that the extra traffic on this road (C class rural road with known constraints, narrow pavements, and school related congestion) would exceed the capacity of the Bicester/Chearsley road roundabout at the Square in Long Crendon, whilst this site is smaller than OPUS 377 there will still be some impact from this that may impact it's suitability, unless the site is designed with strong off-road pedestrian connections back to the rest of the village. This factor will also be compounded when considered alongside OPUS 377

- as with all other sizeable sites in the parish, there are question marks on the Wastewater (sewage) capacity of the village

C.2.4 OPUS 377 Land at Madges Farm, Chearsley Road

19. As with other sites, the HELAA assessment of this site is inconsistent with others in the HELAA on landscape harm and several other points (see section C paragraph 6).
20. An outline planning application has already been submitted for (the LCS03) part of this site nominally for 97 dwellings and this is currently being assessed by Bucks, but of note in this assessment are the following:
    - Traffic and Highways have pointed out that this many dwellings will cause traffic problems between Pinners Way and the Chearsley Road (which is a C class rural road with known constraints, narrow pavements, and school related congestion) and will most likely exceed the capacity of the Bicester/Chearsley road roundabout at the Square in Long Crendon. Furthermore, when the previous application for Greenings for 47 dwellings was made, the Highways Officer noted (in their response to application 15/02806/AOP) that the access design would not be fit for purpose should further development be proposed.
    - Heritage comments that the proposal would result in harm to the special character of Long Crendon Conservation area (CA); and therefore, the harm identified would need to be weighed against the public benefits of the proposed development in line with local and national policy. This is in stark contrast to other sites that have been deemed unsuitable on what appears to be far less grounds on harm to the landscape and special character.
21. A development of up to 95 dwellings (in the current outline proposal) could form a new settlement mass detached from the historic village centre unless it provides high-quality walking and cycling integration, which could well be settlement pattern issue that has been used elsewhere in Bucks assessments to deem some sites as not suitable.
22. As with all other sizeable sites in the parish, there are question marks on the Wastewater (sewage) capacity of the village as well as impacts on the School and Healthcare capacity to support this.

C.2.5 OPUS 159 Land north of Drakes Drive

23. The HELAA shows this site is deemed as unsuitable as housing site based on unacceptable harm to Landscape.
24. As with other sites, the HELAA assessment of this site is inconsistent with others in the HELAA on landscape harm and several other points (see section C paragraph 6).
25. A comparison with OPUS 653 is a good example of this, which the HELAA assessment has deemed as suitable, even though that site is the highest point around the village and dominates the landscape in the area.
26. Furthermore, this assessment appears not to have considered any traffic implications. Long Crendon is generally challenged with the amount of traffic that currently goes through the village on the Bicester to Thame Road and the potential bottlenecks that arise from the Chearsley and Chilton roads feeding into this.
27. This site therefore has the potential (subject to the provision of suitable access and many other criteria) to allow for increase in housing to the village whilst minimising the impact on village traffic, as much of the traffic from this site is unlikely to have to go

through the village centre. Thus, to deem this as unsuitable at this stage seems to ignore local knowledge and traffic issues.

C.3 Deliverability and utility dependencies

28. There are several critical dependencies and utility infrastructure delivery issues which do not appear to have been adequately addressed.
29. The Infrastructure Delivery Plan does not include details of utilities providers' detailed investment programmes, (which are subject to separate regulatory, commercial and asset-management processes) but these are key dependencies in assessing the soundness of deliverability of the plan
30. Whilst it is assumed that the utility companies will meet these dependencies in a timely manner, there are no concrete plans in place to do so, and significant questions of the availability of funding and resources to do so.
31. Of note are the dependencies on utility providers in general and on the water cycle in particular given that Long Crendon's water and wastewater infrastructure is already close to or at its limits and Buckinghamshire is classified as being under serious water stress, made even more pertinent by the recent drought.
32. In our feedback to the HELAA consultation we commented on water and wastewater infrastructure being a constraint. This will be a big dependency of the Housing trajectory for both Long Crendon and wider Bucks area. The Water cycle study provides more on this. Whilst the stage 1 and 2 reports differ a little, they both conclude that:

- Thames Water will require a strategic level "significant upgrades" to their clean water network and production sites to accommodate the proposed level of growth, across the zone.
- The current Wastewater treatment facilities are close to capacity and cannot accommodate the proposed allocated uplift in housing without upgrades. The study notes that across Bucks only 14 of the 46 wastewater treatment works (WTWs) expected to support growth have sufficient capacity, covering just 3% of planned housing. Most sites will require upgrades during the plan period.
- The current Long Crendon Sewage Treatment works are categorised as 'RED' in that the available capacity for extra housing is of the order of 54 dwellings (well below the proposed allocation of 315).
- It is noted that Thames Water are seeking to address these with an upcoming Thames Water's Drainage and Wastewater Management Plan (DWMP) for 2025-2050 that aims to invest:
    - £752m on managing the impact of surface water on the sewerage system
    - £134m on improvements to surface water management
    - £108m upgrading 22 Wastewater Treatment Works
    - £116m on sewer lining
    - £14m for individual property level protection

  But it should be noted that:

    - This DWMP 2028 is being developed for review in 2027 (i.e. it doesn't exist yet and other than the period 2025 to 2050, no further details of timescales are available)

- The current uncertain status of Thames Water as a viable entity represents a massive uncertain dependency for delivery of the proposed housing trajectory of Long Crendon and probably many Bucks areas.
- This should be acknowledged in the plan and be brought out as major caveat/risk

33. Given the lack of detail of these critical dependencies, the status and the soundness of deliverability of the plan and the timings included in appendix F on Housing trajectory should be **highly caveated at best and ideally spelt out further**

C.4 Deliverability and other infrastructure dependencies

34. There are several critical dependencies and non-utility infrastructure delivery issues which do not appear to have been adequately addressed, for example local transport and travel infrastructure (for vehicles, cycling and walking), school capacity, and healthcare capacity.
35. The Infrastructure Delivery Plan lists many projects but is short on definitive commitments, timings and identification of funding for the key projects it mentions.
36. It is noted that the list of mitigations/projects in the infrastructure schedule to the infrastructure delivery plan is not intended to be exhaustive and will require more detailed work as part of the development management process,
37. The Phased delivery assumptions (implied by the numbers in appendix F on Housing trajectory) also seem unrealistic since they do not reflect the staging on how landowners will sell parcels of land or how developers will typically build out sites[9].
38. Given the lack of detail of these critical dependencies, the status and the soundness of deliverability of the plan and the timings included in appendix F on Housing trajectory should be **highly caveated at best and ideally spelt out further**

C.5 Our approach to developing the Long Crendon Neighbourhood plan

39. We feel that in developing our Neighbourhood plan for Long Crendon we are in very good position to bring detailed local knowledge to bear to create a plan for the Parish that fits within the Bucks local plan policies (subject to comments made above) and will also give the best outcome for the Village and therefore we are seeking to 'take this parish off the hands of the Bucks team' and continue to flesh out our plan (which is already well developed) that will

- Maintaining the rural character of the village via assessment of factors on:
  - Impact on the conservation area and heritage elements of the village
  - Protection and potential to improve green and open spaces in the village
  - Impact on existing rural character of the village and limiting landscape harm
- Reducing rather than intensification of traffic pinch points in the village (by either keeping traffic away from the centre of the village and/or containing/controlling traffic flows to the main arterial roads) to encourage sustainable growth in our rural settlement and be consistent with planning principles regarding traffic and social cohesion in small settlements.

[9] For example, College Farm (OPUS 5000(is shown delivering 20 homes in 2030, 40 in 2031 and 40 in 2033,

- Ensuring development suitability via assessment factors on:
    - Proportionality in meeting the village growth targets in a steady/sustainable way without overstretching the village infrastructure and amenities and detracting from the sense of community.
    - The settlement pattern (spatial distribution of sites) to ensure that new developments are well connected to and in suitably proximity to the existing village, do not create a disjointed sense of village community, do not erode boundaries/ gaps to other towns and villages, take into account combined potential traffic pinch points and minimise impacts on existing residents.
    - Flood risks to specific sites and the minimisation of flooding risks to other areas in both the near and longer term.
    - Provision of suitable access points to new sites.
    - Infrastructure capacity support (roads, drainage, sewage, other utilities and services, footpaths and parking).
- Minimising environmental impacts via assessment factors on:
    - Biodiversity impacts (or ideally improvements)
- Maintaining or improving the village sense of community via assessment factors on:
    - Impact on school capacity and catchment area
    - The potential to maintain and where possible enhance village amenities via provisions for improvements and additions of village amenities such as sports/football pitches and facilities, doctor's surgery, children's play areas, cycle paths, additional footpaths, publicly accessible green space
- Maintaining and where possible enhancement of local services via assessment of:
    - The ability/potential to provide or improve employment/work opportunities and village services (healthcare facilities, school & nursery capacity, support for the elderly, library etc)

40. To this end we are currently in consultation with potential land promoters/owners/developers of several sites within the Parish (both within and outside the current HELAA 'suitable' sites) covering a wider range of criteria including what will be delivered on any suitable sites as follows

- Development design suitability and quality via assessment factors on:
    - Meeting specific local village housing needs (more affordable, starter and retirement/downsizing housing vs estates of 'executive homes')?
    - Site Layouts: the provision of attractive, visually unobtrusive, well-spaced designs with suitable greenery/planting provisions
    - The creation of safe and inclusive contact zones
    - The preservation and extension of green corridors
    - Minimising of negative impacts on nearby existing residents both in the final design/layout and considerate controls during construction
    - The use of sustainable building practices
- Minimising environmental impacts via assessment factors on:
    - Energy efficiency of proposed developments (both site specific and potentially for the village as a whole)
    - The sustainability of proposed building materials (e.g. via minimising the use of concrete and maximising more sustainable materials like wood)
- Amenity provision via assessment factors on:
    - The provision of and/or contribution to amenities such as sports/football pitches and facilities, the doctor's surgery/wellbeing centre and children's play areas

- The provision of continuity of walking and cycling routes
- The provision of local, low-threshold community spaces

C.6 Specific Policies

C.6.1 SP2 Housing strategy

41. We welcome that the SP2 Housing strategy policy notes that for Tier 4 - medium settlements/Large Villages (like Long Crendon) 'growth will be at a scale in keeping with Local Character and setting' and as such would refer to the comments made on proportionality in section D.2 Comments on the level of implied additional housing arising for the Long Crendon Parish, However, the target of up to 315 new houses would appear to be out of all reasonable proportion to the existing village size (representing an approximate 30% increase). It also appears incompatible with the strategic approach 6 noted in the draft plan of 'Limited expansion of village' (noted in para 5.19 of the draft Local plan).

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C.6.2 SP4: Strategy for economic growth

42. We note and welcome the reference to the development of the Land off Drakes Drive for Office, Light industrial, General industrial, Storage and distribution and the wording that employment development, particularly larger-scale industrial, warehousing and distribution development, should be located and designed to ensure safe and suitable access to the strategic and local transport network, provide appropriate opportunities for access by walking, cycling and public transport, and avoid or mitigate adverse impacts arising from HGV movements, traffic generation, air quality, noise and other environmental effects. No new employment development is allowed in areas of Flood Zone 3b.

C.6.3 SP10: Infrastructure for transport, telecommunications, utilities, waste

43. We note and welcome this policy that aims to ensure that necessary sustainable transport, telecommunications, utilities and waste infrastructure is delivered to support planned growth, and that developments are required to demonstrate that adequate infrastructure capacity either exists, or that necessary upgrades can be delivered in a timely and coordinated manner, BUT as stated in section C.4 (Deliverability and other infrastructure dependencies) above we would like to stress the uncertainties around this.

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C.6.4 SP12 Community Facilities and Local Services

44. We note and welcome this policy that aims to ensure that communities have access to a comprehensive range of community facilities and local services with an emphasis on:
    a. Health infrastructure, including primary and acute care and community health facilities;
    b. Education provision, including early years, primary, secondary, SEND and further education;
    c. Social, cultural and community facilities including, sport, leisure, arts, faith, libraries and meeting spaces.
45. However, we also note that the Infrastructure Delivery Plan (and the associated Appendix 1 schedule) makes no mention of projects and provisions to provide a) a primary healthcare centre in Long Crendon or b) additional places at the village primary

school for an expanding village. This is probably also the case for other large villages, so again as stated in section C.4 (Deliverability and other infrastructure dependencies) above we would like to stress the uncertainties around this.

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C.6.5 SP14: Placemaking and Design

46. We note and welcome this policy supporting a high standard of design and placemaking, contributing positively to the quality, character and identity of Buckinghamshire's towns, villages and landscapes.

C.6.6 SP16: Healthy communities and tackling health inequalities

47. We note and welcome this policy to ensure that All development should support the physical and mental health and wellbeing of Buckinghamshire residents and reduce health inequalities, but as noted against SP12 there appears to be no provisions in the Infrastructure Delivery plan to cover the provision and funding of a primary healthcare or wellbeing centre, anything to increase the viability of walking and cycling (to minimise car use)or anything on the effective use of green spaces in strategic locations within Long Crendon.

C.6.7 SMA001: Small site allocations for residential and residential-led mixed use development

48. We snote this policy (covering the sites listed in Appendix K, that are allocated for residential or residential-led mixed use development and associated uses and which should be developed in accordance with the relevant Local Plan policies and any key development requirements listed within Appendix K for that specific site) but we would

- Point out that we question the assertion that the specific HELAA sites noted in appendix K should be a fixed part of the evidence for the plan and should not, themselves, be open to consultation or comment (see section C paragraph 6). since we believe that we have important local knowledge and understanding of the various sites to be considered as well as other associated matters. This can make an important contribution to getting the best outcome for Long Crendon and the surrounding area and should, therefore, be considered and incorporated.
- point out the SP1 policy to grow at a scale in keeping with Local Character and setting
- reiterate the very uncertain dependencies on Thames Water (see comments on SP10)
- note that we are doing more extensive detailed work in developing the Neighbourhood plan to cover these sites, and potential alternative sites ((see section C paragraph 40).

C.6.8 LOC02: Land off Drakes Drive, Long Crendon

49. We note and welcome this policy as providing further specific detail to this site beyond SP14

C.6.9 LOC03 - Land north of Lower Icknield Way, Long Crendon

50. Please note that this is incorrectly listed under Long Crendon in the HELAA, since it resides in the Oakley Parish rather than Long Crendon

C.6.10HO1 Housing mix

51. We note and welcome this policy as general housing mix guidance with Bucks wide applicability, but also note that Long Crendon are doing our own Local Parish Housing needs assessment to determine if there are any specific requirements for the Long Crendon Neighbourhood plan

C.6.11HO2 Affordable housing

52. We note this policy but would like clarification as to why the minimum of 25% affordable housing is being used for the North and Central planning areas instead of using the 40% minimum across the board. Do the comments about ensuring that development is able to contribute to essential infrastructure and remain viable mean that these should attract more S106 or similar contributions?

D.Previous HELAA submissions

D.1 Comments on the HELAA methodology

We have the following concerns on the HELAA methodology which appears to:

- Have been a desktop-level analysis with limited local knowledge or nuance.
- Be very limited on traffic, heritage, and flood risk considerations
- Take no meaningful consideration of infrastructure aspects (or modelling) for schools, sewerage, and healthcare)
    - Sewage being especially relevant here as one of the cited in the HELAA methodology's list of physical constraints that should be considered in the initial survey stage and the fact that the Bucks Sustainability Appraisal Note (section 14) notes that the Long Crendon Sewage works has limited capacity for further growth in the local plan period.
- Include previously rejected sites without looking at the reasons for their previous rejection. One site in particular the Council spent considerable amount of money, time and effort fighting and winning against a predatory developer.
- Have been applied inconsistently or involved judgements not specified in the methodology, in particular
    - There are inconsistencies in landscape harm assessments, the HELAA methodology doesn't specify this requirement in any detail other than broad location being within the National Landscape, which appears vague and undefined.
    - 'Settlement pattern' and 'unsustainable location' have been used as a contributing reason for rejecting many sites (222 of the 780 sites in the spreadsheet for 'Settlement pattern' and 192 of the 780 sites for 'unsustainable location'), despite no mention or specification of these as criteria in the HELAA methodology.
    - 'Unacceptable harm on landscape' and 'unacceptable intrusion into the open countryside' appear to have been applied to some sites and not others without any clear justification.
- Not considered overall 'sustainability and deliverability'
    - Arguably the fact that the spreadsheet identifying sites in Long Crendon (for approx. 418 new dwellings) has not considered key constraints that would prevent this being delivered or the strains that this would put on existing road and Sewage Treatment infrastructure, current school places and other village services

Because of this we believe that the site assessment produced to date are flawed, and cannot be relied on in any useful way, furthermore many of these assessments are inconsistent with the initial site assessments already carried out by the Long Crendon Neighbourhood planning steering group (LCNPSG).

D.2 Comments on the level of implied additional housing arising for the Long Crendon Parish

As it stands the sites deemed as 'suitable' for the Long Crendon Parish in the spreadsheet of HELAA sites (https://www.buckinghamshire.gov.uk/documents/40431/2026-02-16_-_HELAA_Sites_1.xlsm) indicates approximately 418 new dwellings to be accommodated in the Parish.

There are significant issues in terms of proportionality of this number and the wider implications of this scale of development, especially given key constraints that have been identified (notably in the areas that the current HELAA methodology is very weak in considering).

Proportionality

Bucks Council has previously rejected sites in Long Crendon on the basis that they would represent disproportionate growth, but Long Crendon has still grown by around 8% over the last 10 years in line with the numbers set out in the current Neighbourhood Plan.

The sites deemed 'suitable' in the current HELAA represent a further increase of approximately 38% increase in the size of the village which is far beyond any reasonable definition of what could be considered proportionate for a rural village, since it would fundamentally alter its character, setting and infrastructure balance.

Whilst we believe that 418 new dwellings isn't proportionate, nor deliverable within the main constraints in the village, we do believe that once we have completed our assessments for our new Neighbourhood plan (as noted above in the Methodology section) then we will be in a position to provide a more realistic evidence based target for the numbers of new dwellings for Long Crendon by the summer.

Traffic

Long Crendon as a village currently suffers from traffic issues and attempts to scale the village of the order suggested by the HELAA will only make this more acute.

In their consideration of the current outline planning application for 97 new dwellings on OPUS 377 (PL/25/6024/OA) the Bucks Traffic and Highways Management response has pointed out that this many dwellings will cause traffic problems between Pinners Way and the Chearsley Road (which is a C class rural road with known constraints, narrow pavements, and school related congestion) and will most likely exceed the capacity of the Bicester/Chearsley road roundabout at the Square in Long Crendon. This provides clear, technical evidence that the local road network is already operating at or beyond capacity. The Council's own modelling shows:

- The Chearsley Road / Bicester Road / The Square mini-roundabout is forecast to operate over capacity in the 2035 PM peak even *without* additional development.
- With development traffic added, the junction reaches RFC 0.97 and delays of around 60 seconds, confirming that the network *cannot absorb further growth*.
- The Highways Authority explicitly states that the development "exacerbates both delays and queuing" and that mitigation is required to bring the junction back within acceptable limits.

Therefore if 97 new dwellings in this area would hit traffic limits, then clearly the suggested number of 418 in this sector of the village will be impossible to deliver due to the resulting volume of traffic in the village.

Infrastructure Capacity

Infrastructure capacity more generally also requires careful consideration, in particular Water and wastewater infrastructure constraints are significant issues for Long Crendon.

Thames Water have confirmed that the Long Crendon Wastewater (Sewage) Treatment Works (WWWT) has limited capacity and that upgrades will be required to accommodate new dwellings. In their response to the outline planning application to OPUS 74 (PL/25/5099/OA) they identified the inability of the existing Sewage Treatment Works infrastructure to accommodate an additional 120 new dwellings, yet no upgrade works are planned for the period 2025–2030 or can accommodate the potential waste water increase due to the 38% increase in housing.

Furthermore, in their consultation response to the outline planning application for OPUS 377 (PL/25/6024/OA) confirms that:

- The existing water network cannot accommodate the needs of new development.
- Major network reinforcement works would be required before occupation.
- Without upgrades, development may lead to no or low water pressure in the village.

Therefore, there are clear constraints on both the water supply and wastewater management systems that would currently restrict the number of new dwellings that can supported in Long Crendon. Furthermore, Thames Water's published AMP7 and AMP8 investment programmes list numerous treatment works scheduled for expansion or improvement, but Long Crendon WWTW is not included in any planned upgrade programme for 2025–2030.

The constraints again mean that the suggested number of 418 new dwellings in the Village is certainly unrealistic in the short term will require unidentified extra funding to even be considered in the longer term.

School Capacity

This point is related to the overall numbers of new dwellings but appears not to have been factored into the Bucks HELAA methodology which makes no mention of school capacity as an important element of 'joined up' local infrastructure required to support any new developments.

The village primary school, even after recent development is already operating close to its capacity as a one Form Entry school, i.e. 210 places.

Significant growth of the village (especially of approx. 400 new dwellings) is therefore likely to trigger the need to expand this to a two-form entry school, even considering falling birth rates.

Any meaningful expansion without compromising play space, safeguarding, or operational functionality would be difficult.

On the reasonable assumption that the education authority would prefer a single expanded school rather than two separate schools within the parish, it follows that growth at this scale will require land capable of accommodating either a physical expansion of the existing school or provision of a new school site that is well integrated with the settlement.

Long Crendon has no secondary school. The village relies almost entirely on Lord Williams's School in Thame, which Is already operating at or near capacity and faces challenges from housing increases across its wider catchment area. Lord Williams is in Oxfordshire and will require Bucks County Council to plan with Oxon to address the additional pupils due to the 38% increase in housing.

Additional development in Long Crendon would increase pressure on secondary places, implying the need for expansion of this school or requiring pupils to travel further afield, increasing car dependency and undermining sustainable transport objectives.

Healthcare access

Like School capacity this point is related to the overall numbers of new dwellings but appears not to have been factored into the Bucks HELAA methodology which makes no mention of healthcare capacity as an important element of 'joined up' local infrastructure required to support any new developments.

Healthcare provision in and around Long Crendon is already operating at or near capacity.

The scale of development suggested from the HELAA analysis would place additional pressure on services that cannot accommodate further growth without significant investment and expansion.

The NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board (BOB ICB) has consistently highlighted that primary care capacity is under pressure across the region, and that new development must demonstrate deliverability of healthcare mitigation, but at present no such expansion is planned or funded.