

Buckingham Neighbourhood Development Plan 2024-2040

**A report to Buckinghamshire Council on the
Replacement Buckingham Neighbourhood
Development Plan**

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Executive Summary

- 1 I was appointed by Buckinghamshire Council in April 2025 to carry out the independent examination of the Replacement Buckingham Neighbourhood Plan.
- 2 The examination was undertaken by written representations. I visited the neighbourhood area on 10 April 2025.
- 3 The Plan seeks to bring forward positive and sustainable development in the neighbourhood area. It allocates land for residential and employment uses. It also includes a revised package of Local Green Spaces. The Plan is commendably focused on a clear set of locally-distinctive issues.
- 4 The Plan has been underpinned by community support and engagement. All sections of the community have been engaged in its preparation.
- 5 Subject to a series of recommended modifications set out in this report, I have concluded that the Plan meets all the necessary legal requirements and should proceed to referendum.
- 6 I recommend that the referendum area should coincide with the neighbourhood area.

Andrew Ashcroft
Independent Examiner
18 September 2025

1 Introduction

- 1.1 This report sets out the findings of the independent examination of the Buckingham Neighbourhood Development Plan 2024-2040 ('the Plan').
- 1.2 The Plan was submitted to Buckinghamshire Council (BC) by Buckingham Town Council (BTC) in its capacity as the qualifying body responsible for preparing the neighbourhood plan. The neighbourhood area was designated in November 2014 by the former Aylesbury Vale District Council (AVDC). AVDC was incorporated into the newly-created Buckinghamshire Council from 1 April 2020.
- 1.3 Neighbourhood plans were introduced into the planning process by the Localism Act 2011. They allow local communities to take responsibility for guiding development in their area. This approach was subsequently embedded in the National Planning Policy Framework (NPPF) in 2012, 2018, 2019, 2021, 2023 and 2024. The NPPF continues to be the principal element of national planning policy.
- 1.4 The role of an independent examiner is clearly defined in the legislation. I have been appointed to examine whether the submitted Plan meets the basic conditions and Convention Rights and other statutory requirements. It is not within my remit to examine or to propose an alternative plan, or a potentially more sustainable plan except where this arises because of my recommended modifications to ensure that the plan meets the basic conditions and the other relevant requirements.
- 1.5 A neighbourhood plan can be narrow or broad in scope and can include whatever range of policies it sees as appropriate to its designated neighbourhood area. The submitted Plan has been designed to be distinctive in general terms, and to be complementary to the existing development plan. It takes a positive approach to new development in the Plan period.
- 1.6 Within the context set out above, this report assesses whether the Plan is legally compliant and meets the basic conditions that apply to neighbourhood plans. It also considers the content of the Plan and, where necessary, recommends changes to its policies and supporting text.
- 1.7 This report also provides a recommendation as to whether the Plan should proceed to referendum. If this is the case and that referendum results in a positive outcome the Plan would then be used to determine planning applications within the neighbourhood area and will sit as part of the wider development plan.

2 The Role of the Independent Examiner

- 2.1 The examiner's role is to ensure that any submitted neighbourhood plan meets the relevant legislative and procedural requirements.
- 2.2 I was appointed by BC, with the consent of BTC, to conduct the examination of the Plan and to prepare this report. I am independent of both BC and BTC. I do not have any interest in any land that may be affected by the Plan.
- 2.3 I possess the appropriate qualifications and experience to undertake this role. I am a Director of Andrew Ashcroft Planning Limited. In previous roles, I have 42 years' experience in various local authorities at either Head of Planning or Service Director level and more recently as an independent examiner. I have significant experience of undertaking other neighbourhood plan examinations and health checks. I am a member of the Royal Town Planning Institute and the Neighbourhood Planning Independent Examiner Referral System.

Examination Outcomes

- 2.4 In my role as the independent examiner of the Plan, I am required to recommend one of the following outcomes of the examination:
- (a) that the Plan as submitted should proceed to a referendum; or
 - (b) that the Plan should proceed to referendum as modified (based on my recommendations); or
 - (c) that the Plan does not proceed to referendum on the basis that it does not meet the necessary legal requirements.
- 2.5 The outcome of the examination is set out in Section 8 of this report.

Other examination matters

- 2.6 In examining the Plan, I am required to check whether:
- the policies relate to the development and use of land for a designated neighbourhood plan area; and
 - the Plan meets the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 (the Plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one neighbourhood area); and
 - the Plan has been prepared for an area that has been designated under Section 61G of the Localism Act and has been developed and submitted for examination by a qualifying body.
- 2.7 I have addressed the matters identified in paragraph 2.6 of this report and am satisfied that they have been met.

3 Procedural Matters

3.1 In undertaking this examination I have considered the following documents:

- the submitted Plan.
- the Basic Conditions Statement.
- the Consultation Statement.
- the Plan's appendices (including the Design Code).
- the Evidence Base.
- the Environmental Report (June 2024).
- the Environmental Report (December 2024).
- the BC SEA and HRA screening report.
- the representations made to the Plan.
- the letter from WSP Limited on behalf of Bloor Homes (18 July 2025).
- the report to Buckinghamshire Council's Central and Northern Area Planning Committee (3 September 2025) on the planning application for land south of Bourton Road, Buckingham (24/03426/AOP).
- BTC's responses to the clarification note.
- the adopted Vale of Aylesbury Local Plan (2017-2033).
- the National Planning Policy Framework (December 2023 and December 2024).
- Planning Practice Guidance.
- relevant Ministerial Statements.

3.2 I visited the neighbourhood area on 10 April 2025. I looked at its overall character and appearance and at those areas affected by policies in the Plan in particular. The visit is described in Section 5 of this report.

3.3 It is a general rule that neighbourhood plan examinations should be held by written representations only. Having considered all the information before me, including the representations, I concluded that the Plan could be examined by way of written representations and that a hearing was not required.

3.4 The Plan has been prepared as a replacement plan rather than as a review of the made Plan. The examination proceeded on this basis.

The update of the NPPF

3.5 The NPPF was updated on 12 December 2024. Paragraph 239 of the NPPF 2024 sets out transitional arrangements for plan-making. It comments that the policies in the Framework will apply for the purpose of preparing neighbourhood plans from 12 March 2025 unless a neighbourhood plan proposal has been submitted to the local planning authority under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended) on or before the 12 March 2025.

3.6 On this basis, the examination of the Plan against the basic condition that it should have regard to national policies and advice contained in guidance issued by the Secretary of State is based on the 2023 version of the NPPF. Plainly the Plan was

submitted in 2024 in that context. Where NPPF paragraph numbers are used in this report, they refer to those in the December 2023 version.

- 3.7 Paragraph 6.2 of this report sets out full extent of the basic conditions against which a neighbourhood plan is examined.

4 Consultation

Consultation Process

- 4.1 Policies in made neighbourhood plans become the basis for local planning and development control decisions. As such, the regulations require neighbourhood plans to be supported and underpinned by public consultation.
- 4.2 In accordance with the Neighbourhood Planning (General) Regulations 2012 (as amended), BTC prepared a Consultation Statement. It is proportionate to the neighbourhood area and its policies.
- 4.3 Section 2A of the Statement records a comprehensive timeline of events. Section 2B sets out how BTC engaged with stakeholders.
- 4.4 The Statement also comments on the consultation processes that took place on the pre-submission version of the Plan (July to October 2024).
- 4.4 Section 3 comments about the way in which the Plan was refined because of the comment received at the pre-submission stage. This analysis helps to describe how the Plan has progressed to the submission stage.
- 4.5 Consultation has been an important element of the Plan's production. Advice on the neighbourhood planning process has been made available to the community in a positive and direct way by those responsible for the Plan's preparation. From all the evidence provided to me as part of the examination, I conclude that the Plan has promoted an inclusive approach to seeking the opinions of all concerned throughout the process. BC has carried out its own assessment that the consultation process has complied with the requirements of the Regulations.

Consultation Responses

- 4.6 Consultation on the submitted plan was undertaken by BC that ended on 30 January 2025. This exercise generated representations from the following organisations:
 - Anglian Water
 - Buckinghamshire Council
 - Natural England
 - Wheeldon Estates
 - Gawcott with Lenborough Parish Council
 - Charterhouse Strategic Land
 - The Orton Family
 - Bloor Homes
 - National Highways
 - Historic England
 - Rainer Developments

- Hallam Land Management
- Trustees of the Leonard Hill Will Trust/Ridgepoint Homes
- University of Buckingham
- Manor Oak Homes
- The Royal Latin School

4.7 Several comments were received from people living in the neighbourhood area.

4.8 I have taken account of all the representations in preparing this report. Where it is appropriate to do so, I refer to specific representations on a policy-by-policy basis.

5. The Neighbourhood Area and the Development Plan Context

The Neighbourhood Area

- 5.1 The neighbourhood area is the parish of Buckingham. Buckingham is an historic market town in the north of Buckinghamshire. It is located eight miles west of the Milton Keynes built-up area, eleven miles from Bicester and seventeen miles to the north of Aylesbury. It was designated as a neighbourhood area in November 2014 by the former Aylesbury Vale District Council.
- 5.2 The centre of Buckingham is predominantly Georgian or earlier in building style, with infill which took place in the Victorian period. A Conservation Area was designated in 1971 and amended in 2005. There is a large concentration of listed buildings in the central area of the town. Despite later development, much of the original medieval street pattern and burgage plots still exist. These streets are focused around the market area, the River Great Ouse and the Parish Church
- 5.3 Buckingham has a substantial number of independent retailers and service providers. Tesco has a superstore on the edge of town and more recently Aldi has also opened on the edge of town. Further convenience stores are found in the town including Waitrose, Tesco Metro, Londis and a Sainsbury's Local. The University of Buckingham was the U.K.'s first independent university, and offers intensive two-year degree programmes. It is located on the edge of the town and is a major employer within the town, as well as providing significant input into the town's economy. The town also enjoys a full range of school and leisure facilities.

Development Plan Context

- 5.4 The development plan for the neighbourhood area is the Vale of Aylesbury Local Plan 2013 to 2033 (VALP) which was adopted in September 2021. It allocates land at Moreton Road (Policy D-BUC043), and off Osiers Way (Policy D-BUC046) for residential use in the neighbourhood area
- 5.5 Policy S2 (Spatial Strategy for Growth) comments that the primary focus of strategic levels of growth and investment will be at Aylesbury, and development at Buckingham, Winslow, Wendover, and Haddenham supported by growth at other larger, medium, and smaller villages. It also advises that Buckingham will accommodate growth of 2,177 new homes and that this growth will enhance the town centre and its function as a market town, and will support sustainable economic growth in the north of Aylesbury Vale.
- 5.6 Policy S3 (Settlement Hierarchy and Cohesive Development) continues this approach. It comments that other than for specific proposals which accord with policies in the Plan to support thriving rural communities and the development of allocations in the Plan, new development in the countryside should be avoided, especially where it would compromise the character of the countryside between settlements, and result in a negative impact on the identities of neighbouring settlements or communities leading to their coalescence. The policy also comments about the importance of maintaining

the individual identity of villages and avoiding extensions to built-up areas that might lead to further coalescence between settlements.

5.7 In addition to Policies S2 and S3, the following policies in the VALP have been particularly important in underpinning the approach taken in the submitted Plan:

- H1 Affordable Housing
- H6a Housing Mix
- E4 Working from Home
- BE1 Heritage Assets
- BE2 Design of new development
- NE6 Local Green Space
- NE8 Trees, hedgerows, and woodlands
- I3 Community facilities, infrastructure and asserts of community value

5.8 The submitted Plan has been prepared within its up-to-date development plan context. In doing so, it has relied on up-to-date information and research that has underpinned existing planning policy documents. This is good practice and reflects key elements in Planning Practice Guidance on this matter. I am satisfied that the submitted Plan seeks to add value to the different components of the development plan and to give a local dimension to the delivery of its policies. This is captured in the Basic Conditions Statement.

Visit to the neighbourhood area

5.9 I visited the neighbourhood area on 10 April 2025. I approached along the A422 from Brackley. This helped me to understand its position in the wider landscape and its accessibility to the road network.

5.10 I looked initially at the Parish Church, Church Street, and the graveyard. I saw that it was a peaceful enclave in a busy town.

5.11 I then spent time looking at the University buildings in the area to the south of the Parish Church.

5.12 I then looked at the railway walk. I saw the remnants of the former station and walked up to the bridge over Hunter Street.

5.13 I then looked at the town centre. I saw its healthy range of independent and national retailers. I also took the opportunity to look at the brownfield opportunity sites as identified in Policy HP2.

5.14 I then looked at the Canal basin to the east of the town. I took time to understand the development proposed in Policy CLH2 of the Plan.

5.15 I then looked at the proposed employment site off London Road (Policy EE2).

- 5.16 I then looked at the proposed housing allocation to the south and west of the town (and its relationship with recently constructed houses).
- 5.17 I left the neighbourhood area along the A421 towards Bicester. As with the initial part of the visit, this helped me to understand its position in the wider landscape and its accessibility to the road network.

6 The Neighbourhood Plan and the Basic Conditions

- 6.1 This section of the report deals with the submitted neighbourhood plan as a whole and the extent to which it meets the basic conditions. The submitted Basic Conditions Statement has helped in the preparation of this section of the report. It is an informative and well-presented document.
- 6.2 As part of this process, I must consider whether the submitted Plan meets the basic conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. To comply with the basic conditions, the Plan must:
- have regard to national policies and advice contained in guidance issued by the Secretary of State;
 - contribute to the achievement of sustainable development;
 - be in general conformity with the strategic policies of the development plan in the area;
 - not breach, and otherwise be compatible with, the assimilated obligations of EU legislation (as consolidated in the Retained EU Law (Revocation and Reform) Act 2023 (Consequential Amendment) Regulations 2023; and
 - not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

I assess the Plan against the basic conditions under the following headings:

National Planning Policies and Guidance

- 6.3 For the purposes of this examination the key elements of national policy relating to planning matters are set out in the National Planning Policy Framework December 2023 (NPPF).
- 6.4 The NPPF sets out a range of land-use planning principles to underpin both plan-making and decision-taking. The following are particularly relevant to the replacement Buckingham Neighbourhood Development Plan:
- a plan-led system - in this case the relationship between the neighbourhood plan and the VALP;
 - building a strong, competitive economy;
 - recognising the intrinsic character and beauty of the countryside and supporting thriving local communities;
 - taking account of the different roles and characters of different areas;
 - highlighting the importance of high-quality design and good standards of amenity for all future occupants of land and buildings; and
 - conserving heritage assets in a manner appropriate to their significance.
- 6.5 Neighbourhood plans sit within this wider context both generally, and within the more specific presumption in favour of sustainable development. Paragraph 13 of the NPPF indicates that neighbourhoods should both develop plans that support the strategic

needs set out in local plans and plan positively to support local development that is outside the strategic elements of the development plan.

- 6.6 In addition to the NPPF, I have also taken account of other elements of national planning policy including Planning Practice Guidance and the recent ministerial statements.
- 6.7 Having considered all the evidence and representations available as part of the examination I am satisfied that the submitted Plan has had regard to national planning policies and guidance subject to the recommended modifications in this report. It sets out a positive vision for the future of the neighbourhood area and includes a series of policies that address a range of development and environmental matters. It has a focus on identifying sites for residential and employment development. It also proposes the designation of additional Local Green Spaces.
- 6.8 At a more practical level, the NPPF indicates that plans should provide a clear framework within which decisions on planning applications can be made and that they should give a clear indication of how a decision-maker should react to a development proposal (paragraph 16d). This is reinforced in Planning Practice Guidance (ID:41-041-20140306) which indicates that policies in neighbourhood plans should be drafted with sufficient clarity so that a decision-maker can apply them consistently and with confidence when determining planning applications. Planning practice guidance also advises that planning policies should be concise, precise, and supported by appropriate evidence.
- 6.9 As submitted, the Plan does not fully accord with these practical issues. Most of my recommended modifications in Section 7 relate to matters of clarity and precision. They are designed to ensure that the Plan fully accords with national policy.

Contributing to sustainable development

- 6.10 There are clear overlaps between national policy and the contribution that the submitted Plan makes to achieving sustainable development. Sustainable development has three principal dimensions – economic, social, and environmental. I am satisfied that the submitted Plan has set out to achieve sustainable development in the neighbourhood area. In the economic dimension, the Plan includes policies for urban area allocations (Policy HP2), for land to the south and west of the town (Policy HP3), for the canal area (Policy CLH2), for the town centre (Policy EE1), for commercial and business uses (Policy EE2), and for the University (Policy EE3). In the social dimension, it includes policies on local green spaces (Policy ENV5), on health facilities (Policy CLH3), and on schools (Policy EE4). In the environmental dimension, the Plan positively seeks to protect its natural, built, and historic environment. It has policies on design (Policy DH1) and on The Green Ring (Policy ENV1). This assessment overlaps with the details on this matter in the submitted Basic Conditions Statement.

General conformity with the strategic policies in the development plan

- 6.11 I have already commented in detail on the development plan context in this part of Buckinghamshire in paragraphs 5.4 to 5.8 of this report.
- 6.12 I consider that the submitted Plan delivers a local dimension to this strategic context and supplements the detail already included in the adopted development plan. Subject to the recommended modifications in this report, I am satisfied that the submitted Plan is in general conformity with the strategic policies in the development plan.

Strategic Environmental Assessment

- 6.13 The Neighbourhood Plan (General) (Amendment) Regulations 2015 require a qualifying body either to submit an environmental report prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 or a statement of reasons why an environmental report is not required.
- 6.14 BC undertook a screening exercise in August 2023 and concluded that a Strategic Environmental Assessment was needed. To comply with this requirement, BTC commissioned the preparation of an Environmental Report. The resulting report (December 2024) is thorough and well-constructed. It refers to the proposed allocated site in the Plan (in Policy HP3) as Site M.
- 6.15 The Environmental Report (ER) assessed three options as reasonable alternatives as follows:
- Scenario 1 - constants plus Site Q (total supply of 754 homes);
 - Scenario 2 - constants plus Site M (total supply of 1,254 homes); and
 - Scenario 3 - constants plus Site Q and Site M (total supply of 1,754 homes).
- 6.16 The Report concludes that 'it is immediately apparent that there is a strong case for supporting Scenario 2, which performs best or equal best under the most sustainability topic headings, and which is associated with the highest number of predicted positive effects (including on 'significant' positive) and equal fewest predicted negative effects.' It also advises that it is not the aim of the assessment to reach a conclusion on which of the scenarios is best performing overall, because the assessment is not undertaken with any assumptions made regarding the degree of importance/weight that should be assigned to each of the sustainability topics (nor are they assumed to have equal weight). It then properly advises that it is for BTC to assign weight and in turn arrive at an overall conclusion on which of the scenarios to take forward. The Report also recognises that several of the topic-specific assessment conclusions are finely balanced or otherwise open to debate.
- 6.17 In general terms I am satisfied that the Environmental Report has addressed the various matters in a comprehensive way. In addition, it has sought to ensure that the Plan has a proper functional relationship with the emerging Local Plan. Furthermore, it incorporates a comprehensive assessment of reasonable alternatives.
- 6.18 Since the ER was prepared and the Plan was submitted BC has determined a planning application on land at Bourton Road, Buckingham (24/03426/AOP). Plainly this is a

matter for BC in its capacity as the local planning authority. Nevertheless Section 7 of this report comments on the relationship of this decision with the findings of the ER. This matter overlaps with the representation on the Plan made by Bloor Homes which is addressed in Section 7 of this report (when addressing Policy HP3).

- 6.19 Charterhouse Strategic Land's representation addresses the SEA process. I have also considered this representation in Section 7.

Habitats Regulations Assessment

- 6.20 BC prepared a Habitats Regulations Assessment (HRA) of the Plan in August 2023. It is thorough and comprehensive. The HRA concludes that:

- the Buckingham neighbourhood plan review is expected to allocate one or more sites for development in lieu of the emerging Local Plan and more specifically to try and address important infrastructure issues affecting the town. This will also extend to working with local stakeholders, such as the University, the Canal Society, and others in terms of their future plans. It is also likely to contain policies on design coding, local heritage assets, green infrastructure (including Local Green Space designation), housing mix, zero carbon building standards and traffic management. However, the neighbourhood area is not in any proximity to an SAC or SPA.
- the neighbourhood area (the Town Council area and a small area of Gawcott with Lenborough Parish) does not include any area of Special Area of Page 35 of 41 Conservation or Special Protection Area. The nearest part of the Chiltern Beechwoods SAC (which is the nearest SAC to the parish) is near Ringshall and Ashridge, 29.2km to the south-southeast of the neighbourhood area boundary. There is also an SAC at Oxford Meadows just east of Oxford, 30.4km southwest of the neighbourhood area boundary. The neighbourhood area is not in the Ashridge Commons and Woods SSSI 12.6km buffer zone. The nearest part of the neighbourhood area is 29.2km to the Ashridge Commons and Woods SSSI. There would also be no adverse effects due to the nature of the plan and distance on the Burnham Beeches, Aston Rowant, Windsor Forest and Great Park SAC or Richmond Park SAC or any SPAs and RAMSAR sites.
- the Neighbourhood Plan is not likely to lead to potential adverse effects on a European site that needs investigating by the preparation of an Appropriate Assessment. Therefore, no HRA stage 2 (Appropriate Assessment) is deemed required.

- 6.21 Having reviewed the information provided to me as part of the examination I am satisfied that a proportionate process has been undertaken in accordance with the various regulations. None of the statutory consultees have raised any concerns regarding either neighbourhood plan obligations. In the absence of any evidence to the contrary, I am entirely satisfied that the submitted Plan is compatible with this aspect of neighbourhood plan regulations.

Human Rights

- 6.22 In a similar fashion I am satisfied that the submitted Plan has had regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights (ECHR) and that it complies with the Human Rights Act. There is no evidence that has been submitted to me to suggest otherwise. There has been full and adequate opportunity for all interested parties to take part in the preparation of the Plan and to make their comments known. On this basis, I conclude that the submitted Plan does not breach, nor is in any way incompatible with the ECHR.

Summary

- 6.23 On the basis of my assessment of the Plan in this section of my report, I am satisfied that it meets the basic conditions subject to the incorporation of the recommended modifications contained in this report.

7 The Neighbourhood Plan policies

- 7.1 This section of the report comments on the policies in the Plan. It makes a series of recommended modifications to ensure that the various policies have the necessary precision to meet the basic conditions.
- 7.2 The recommendations focus on the policies in the Plan given that the basic conditions relate primarily to this aspect of neighbourhood plans. However, in some cases, I have also recommended changes to the associated supporting text.
- 7.3 I am satisfied that the content and the form of the Plan is fit for purpose. It is distinctive and proportionate to the neighbourhood area. The wider community and BTC have spent time and energy in identifying the issues and objectives that they wish to be included in their Plan. This sits at the heart of the localism agenda.
- 7.4 The Plan has been designed to reflect Planning Practice Guidance (Section 41-004-20190509) which indicates that neighbourhood plans must address the development and use of land.
- 7.5 I have addressed the policies in the order that they appear in the submitted Plan.
- 7.6 For clarity, this section of the report comments on all the policies.
- 7.7 Where modifications are recommended to policies they are highlighted in bold print. Any associated or free-standing changes to the text of the Plan are set out in italic print.

The initial parts of the Plan

- 7.8 The initial elements of the Plan set the scene for the policies. They are proportionate to the neighbourhood area and the subsequent policies.
- 7.9 The Introduction sets the scene for the Plan. It describes the neighbourhood area (as shown on Figure 1) and identifies the Plan period.
- 7.10 The Background section comments about the way in which the Plan has been prepared and how it has sought to relate to the emerging Local Plan for Buckinghamshire.
- 7.11 The next section comments about the Plan's vision and objectives. It makes a strong functional relationship between the objectives and the resulting policies. The Plan advises that the overarching vision of the Plan remains to make Buckingham a better place to live, work, study, and play.
- 7.12 The Plan is organised around the following six themes:
- HP: Housing and Phasing;
 - DH: Design and Heritage;
 - ENV: Environment;
 - CLH: Culture, Leisure, and Health;
 - EE: Economy and Education; and
 - I: Infrastructure.

- 7.13 The remainder of this section of the report addresses the definition of the Plan period and then each policy in turn in the context set out in paragraphs 7.5 to 7.7 of this report.

The Plan period

- 7.14 The proposed Plan period is 2024 to 2040. The Basic Conditions Statement advises that:

‘(the Plan) does not seek to demonstrate general conformity with the policies of any emerging Buckinghamshire-wide Local Plan. Unfortunately, that plan has not made sufficient progress for any evidence or reasoning to inform the Neighbourhood Plan, other than the publication of Call for Sites submissions. The Town Council therefore hopes that the Neighbourhood Plan, particularly its early engagement work on growth scenarios for the town, will assist Buckinghamshire Council in planning for this part of its local plan in due course, in a way that does not undermine the Neighbourhood Plan vision and objectives for securing infrastructure alongside additional growth.’

- 7.15 Bloor Homes comments about the Plan period as follows:

‘In the context of the future Buckinghamshire Local Plan, one must consider the implications of the (Plan) in its current form and its self-established housing requirement if, hypothetically, it was to be adopted. The (Plan) would effectively have established a housing requirement and allocations to meet that requirement for Buckingham without an understanding of what the emerging Bucks Local Plan’s growth strategy/scenarios. Even if BTC has been in dialogue with the local planning authority in this regard, there is no evidence of this in the public domain or any explanation in the (Plan) or its evidence base documents to demonstrate how the (Plan) aligns with future aspirations for growth in Buckinghamshire.

The consequence of this scenario is that strategic decisions are being made now at a neighbourhood plan level (in the form of strategic policies) would undermine the future growth/spatial strategies and housing need requirements that the future Buckinghamshire Local Plan might envisage – the neighbourhood plan would be guiding the future local plan, rather than vice-versa, which is clearly at odds with national policy, guidance, and legislation.

In the absence of a sufficiently progressed Buckinghamshire Local Plan, the timing of the (Plan) is premature and should not be setting growth levels beyond the current local Plan to 2040. This concern is further substantiated by the recently proposed changes to the NPPF and the outcome of the proposed revised method for calculating housing requirements.’

- 7.16 In its response to the clarification note BTC advised that:

‘the provisions of Planning Practice Guidance Paragraph 009 (ID: 41-009-20190509) (have) guided the Council’s approach to this matter. The neighbourhood plan (BNDP) is intended to replace the made neighbourhood plan (2015) to align with the adopted local plan (VALP) and to anticipate future strategic needs. The plan period (2024 – 2040) is designed to bridge the transition between the end of the VALP and the beginning of the emerging Buckinghamshire Local Plan. The BDNP is a clear example

of integrated plan-making reflecting a strong working relationship between the Councils ensuring a robust plan-led growth strategy for Buckingham through to 2040.

The VALP remains the adopted local plan and the BDNP has been prepared to be in general conformity with the strategic policies of the VALP. The VALP's spatial vision encourages growth in Buckingham to be neighbourhood plan-led (VALP §8). VALP's plan period ends in 2033, and the BDNP has been designed to extend this framework to 2040 in a consistent manner reflecting housing and infrastructure needs over a longer period (BDNP §5-7).

Buckinghamshire Council is preparing a new Local Plan to cover the period beyond 2040, currently up to 2045. While the new Local Plan is still under preparation, Buckingham is likely to retain its status in the higher order of a settlement hierarchy in Buckinghamshire as it is a sustainable town with some strategic geographical significance.

The Councils agreed that setting the BDNP plan period to 2040 provides a sustainable basis for planned infrastructure and housing growth and reflects the NPPF provisions on the importance of a genuinely plan-led system (NPPF §15). It has agreed that any additional housing requirement, as the emerging Local Plan with a longer plan period proceeds further, will be dealt with through either the emerging Local Plan itself or a review of the (Plan).'

- 7.17 I have considered this matter very carefully and in the context of two key matters. The first is the flexibility which national legislation gives to qualifying bodies in relation to the timing of the submission of neighbourhood plans. The second is national advice on Plan periods and the extent to which the 15-year Plan period would have regard to national policy. The third is the extent to which the approach taken by BTC has been agreed with BC. As BTC comment these matters are addressed in Planning Practice Guidance (ID: 41-009-20190509).
- 7.18 On the first point, the Plan acknowledges that the emerging Local Plan will be adopted at some future point. In this context BTC has advised that the Plan is intended to replace the made neighbourhood plan (2015) to align with the adopted local plan (VALP) and to anticipate future strategic needs. In this context the plan period is designed to bridge the transition between the end of the VALP and the beginning of the emerging Buckinghamshire Local Plan. I am satisfied that the Plan has been prepared in this positive fashion and that the proposed Plan period reflects that approach.
- 7.19 On the second point, I note that Planning practice guidance (ID: 41-003-20190509) advises that 'Neighbourhood planning provides the opportunity for communities to set out a positive vision for how they want their community to develop over the next 10, 15, 20 years in ways that meet identified local need and make sense for local people. They can put in place planning policies that will help deliver that vision or grant planning permission for the development they want to see.' I am satisfied that BTC has taken a responsible approach to this matter. The Plan has a positive vision and promotes residential and commercial growth.

- 7.20 On the third point, the response to the clarification note has provided evidence about the way in which BC and BTC have sought to agree an indicative figure for the neighbourhood area both generally, and given the interrelationship between the preparation of the neighbourhood plan and the emerging Local Plan. The approach taken reflects the size and sustainability of the town and BC's current approach to its capacity to deliver new growth as part of the overall strategy for the County in the emerging Local Plan. As such I am satisfied that it is a positive response to Planning practice guidance (ID:41-102-20190509) on the way in which a local planning authority should identify indicative housing requirement figures for designated neighbourhood areas. Furthermore, the allocation of the site in the neighbourhood plan will contribute to significantly boosting the supply of homes in the town in accordance with paragraph 60 of the NPPF. Plainly there is the possibility that the eventual outcome of the emerging Local Plan will be that Buckingham needs to deliver a high level of growth than that currently proposed in the submitted neighbourhood Plan. In this context I note that BC's response to the clarification note advises that it has been agreed that any additional housing requirement will be dealt with through either the emerging Local Plan itself or a review of the neighbourhood plan. Such an approach would address this scenario in a satisfactory and plan-led way. Nevertheless, for clarity I recommend that the Plan comments accordingly. Otherwise, I am satisfied that the identified Plan period meets the basic conditions.

Add the following new paragraphs at the end of the Background Section of the Plan to read:

'The Plan period of 2024 to 2040 has been carefully chosen. The Plan is intended to replace the made neighbourhood plan (2015) to align with the adopted Vale of Aylesbury Local Plan, and to accommodate future strategic needs. The plan period bridges the transition between the end of the existing Local Plan and the beginning of the Buckinghamshire Local Plan. The Plan reflects the strong working relationship will Buckinghamshire Council with a view to ensuring a robust plan-led growth strategy for Buckingham through to 2040.

The Town Council will monitor the effectiveness of the Plan's policies both generally, and as it is implemented through the development management process. The Town Council and Buckinghamshire Council have agreed that should any additional housing requirement, arise from the emerging Local Plan the matter will be dealt with through either the emerging Local Plan itself or a review of the replacement Neighbourhood Plan.'

HP1 A Spatial Strategy for the Town

- 7.21 The supporting text advises that the policy responds to the call of the VALP for growth in Buckingham to be led by neighbourhood planning. The policy defines a settlement boundary on the Policies Map as a means of establishing the furthest extent and direction of development growth planned for the period to 2040. The policy also encourages the completion of infilling of the urban area to minimise the need to consider additional extensions of the town into the open countryside.

- 7.22 The policy also makes provision for additional growth to 2040. The quantum of development proposed is derived from a combination of factors comprising the Housing Needs Assessment evidence and a view on past and future market absorption rates in the town. Additionally, an indicative housing requirement figure for Buckingham has been provided by BC.
- 7.23 In general terms, I am satisfied that the policy takes an appropriate and positive approach to the establishment of a spatial strategy for the town. The strategy will focus new development within the Settlement Boundary. In this context it also provides a context for the delivery of new growth in the Plan period. Nevertheless, I recommend that Part A of the policy is modified to clarify that the strategic housing requirement is minimum figure.
- 7.24 Following the recent appeal decision on land at London Road (23/00178/AOP), I recommend that the amount of employment land anticipated in the policy is revised accordingly. This matter is addressed in greater detail in the section on Policy EE2 in this report.
- 7.25 I have noted the comments from the development industry. In the main they relate to the relationship between the neighbourhood plan and the emerging Local Plan, the site selection process, and the delivery of the sites allocated or identified in the Plan. These matters are addressed in detail elsewhere in this section of the report.
- 7.26 The lettering sequence in the policy is unclear and I recommend modifications accordingly. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development

Replace Part A iii) of the policy with ‘making provision for a minimum of 1,254 new homes, 1.7 ha of employment land, and new and/or improved infrastructure required for growth.’

Delete the letters D and E and replace ‘D’ with ‘B’

HP2 Urban Area Allocations

- 7.27 The policy identifies nine sites that have been assessed as being previously developed land and comprises retained allocations from the made Plan, the Buckinghamshire Local Plan Brownfield Call for Sites, and the project’s own site assessment work. The project’s assessment work indicates that these brown field sites have a combined capacity to deliver approximately 300 homes as well as some new commercial, business, and service floorspace. In most cases, the sites are under-occupied with some vacant land; others are occupied with businesses users or entirely vacant.
- 7.28 Parts B and C of the policy provide specific policy advice on Sites E and J respectively.
- 7.29 The Plan advises that policy is intended to signal to land interests and investors that the community is keen to see the reuse of brownfield land to deliver new homes and jobs in the first instance, therefore limiting the scale of any greenfield sites which need to be considered for allocation.

- 7.30 In general terms I am satisfied that the policy takes a positive approach to urban area allocations and has regard to Sections 5 and 11 of the NPPF.
- 7.31 The second element of Part A of the policy advises that redevelopment proposals on the land will be supported provided they can show that their social and environmental benefits will outweigh any economic cost. On the one hand, this could be seen to be restricting the scope for resid or residential-led redevelopment proposals. However, on the other hand, the way in which this element of the policy would apply is satisfactorily identified in paragraph 5 of the supporting text.
- 7.32 Part B of the policy comments about Site E which is owned by the University. This element of the policy is underpinned by the comprehensive supporting text in paragraph 4. In these circumstances I recommend that the policy is simplified. I also recommend a modification to the so that it has a more neutral approach.
- 7.33 Otherwise the policy meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development

Replace Part B with: ‘Any redevelopment proposals for site E should demonstrate that they conform with the requirements of Policy EE3 of the Plan.’

Replace the first sentence of paragraph 4 with: ‘There is a lack of certainty on the University’s future plans.’

HP3 Land to the South West of Buckingham

- 7.34 The policy proposes the allocation of 32.4 hectares of land to the south west of Buckingham and establishes key land uses and development principles to meet the needs of the local community and to ensure a successful scheme is delivered. The supporting text advises that alongside the brownfield sites identified within the town, the policy is an enabling policy to support the next level of infrastructure growth within the town.
- 7.35 The proposed allocation includes a new primary school, local centre, green and blue infrastructure enhancements, and new homes. The policy is supported by an illustrative concept plan (Figure 8).
- 7.36 I looked at the site carefully during the visit. I noted that it would be a logical and natural extension of the town. In addition, it has ready access to the strategic A421. In general terms I am satisfied that the policy has regard to Section 5 of the NPPF and will contribute to a significant boost in the supply of housing land in the neighbourhood area.
- 7.37 I note that Hallam Land Management advises that it supports the allocation of the site and the content of the policy. This provides a high degree of assurance that the site is both available and deliverable within the Plan period.

SEA/Site Selection

- 7.38 The allocation of the site reflects the outcome of the Environmental Report (December 2024). Paragraphs 6.15 to 6.17 of this report have summarised the findings of the

Environmental Report (ER) and provided high level commentary about the way that process meets the requirements for this task.

7.39 In its representation, Charterhouse Strategic Land (CSL) sets out a series of concerns about the ER. The first is that it contends that the process has significant limitations remaining with respect to the extent and depth of the assessment of the high-level growth scenarios including the lack of weighting or ranking or the importance of the various SEA themes and therefore the effects identified from the assessment and the absence of detailed technical information to support assumptions or analysis of the scenarios in the SEA. The second is that it contends that it has not sufficiently established or then effectively tested other sites/land capable of delivering the Plan's objectives as alternatives to the Council's preferred option and draws conclusions that go beyond the depth and extent of analysis and evaluation set out in the SEA.

7.40 CSL also contend that the updated Environmental Report indicates a lack of awareness of the background, context and detail of the land South and East of Lace Hill (Site 'W' in the SEA). Furthermore, CSL advises that it has made efforts to ensure positive and proactive engagement throughout the Plan preparation process through formal representations as well as the submission of a Vision Document, background context and information; various meetings held with both BTC and through public engagement with community stakeholders at a 'developer roadshow' in January 2024.

7.41 In its response to the clarification note BTC commented as follows:

'BTC utilised the government's support programme for neighbourhood planning to secure a reputable consultant for completing the SEA. In this respect BTC also notes the provision of Planning Practice Guidance Paragraph: 030 Reference ID: 11-030-20150209 on the level of detail required by an SEA and of Paragraph: 038 Reference ID: 11-038-20190722 which recognises that the consideration of alternatives that can realistically be considered in a neighbourhood plan may be limited. Any additional information on the background, context and detail of the Land South and East of Lace Hill (Site 'W' in the SEA) would not change the conclusions reached on the geographical location of the site (See SEA §5.3.13) nor the limitations of the (Plan) to plan for development beyond 2040.

CSL attended a meeting with the Town Council and one of its consultants to explore amongst other things, possibilities of a consortium to deliver the scenario growth options. BTC was advised by their consultant that CSL did not seem ready or willing to pursue this aspect – this is in reply to CSL's comments and not put forward a reason for not pursuing the site further, this is set out in the SEA. It is also noted that although CSL did participate in the meetings and Developers' Roadshow, the boards provided then, and as an appendix to the Reg 16 comments, remain highly conceptual and with insufficient detail in which the residents of Buckingham might have been interested. BTC feels that it is not for the Council to push a commercial developer to produce more detailed plans if developer is not yet ready to do so for public consumption.

7.42 The representation from Bloor Homes identifies that it has land interests at Manor Farm, Bourton, (10.56ha) that it is actively promoting and seeking to bring forward for a residential-led development including new pre-school/nursery, substantial areas (in

total around 16ha) of on-site and off-site open space and play areas, significant biodiversity net gains and improved active travel links and countryside access. The planning application for the proposed development of this land was refused planning permission by BC Central and North Planning Committee on 3 September 2025 based on its relationship with the existing built form of the town (including the A413) and its associated incursion into the countryside, and its conflict with the adopted development plan and the emerging Neighbourhood Plan.

7.43 The Bloor Homes representation makes a series of related comments on its key concerns on the Plan's approach as follows:

- the (Plan) has not had regard to and is contrary to national planning policy, guidance, and legislation, in terms of defining the housing requirement and in dealing with 'strategic policies' such as levels of affordable housing (and without viability evidence).
- the restrictive nature and timing of the (Plan) will have significant implications for the preparation of the future Buckinghamshire Local Plan, and decision making for the next 5 years, if made, contrary to the achievement of sustainable development.
- the implications of the revised NPPF published 12th December 2024 and the revised method for calculating housing need.
- the approach to housing allocations in the (Plan) and deliverability to meet the requirements.

These matters were reinforced further in the letter from its agent (WSP Limited) whilst the examination was proceeding

7.44 I have considered these representations (and the additional WSP comments) very carefully. Based on all the available evidence, and the conclusions which I have made on the Plan period (in paragraphs 7.14 to 7.20 of this report) I have concluded that:

- BC and BTC have taken a positive approach to an indicative figure for housing growth in the neighbourhood area which will significantly boost the supply of homes in the neighbourhood area;
- the ER has addressed the reasonable alternatives in a very thorough way and which relates to the guidance in Planning practice guidance. Indeed, the level of detail and analysis goes beyond what is usually found in a neighbourhood plan ER, and is proportionate to the scale of growth proposed in the Plan and the range of options available;
- the date on which the Plan was submitted to BC requires that it is assessed against the December 2023 version of the NPPF;
- the recommended modification to the Background Section of the Plan (in paragraph 7.20 of this report reinforces the approach taken by BC and BTC that the Plan will need to be reviewed further should the strategic requirement for Buckingham be increased in the emerging Local Plan beyond that included in the submitted neighbourhood plan;
- the submitted Plan has taken an appropriate approach towards the Bloor Homes proposals for land at Manor Farm, Bourton;

- BTC was aware of CSL's promotion of land at Site W and provided specific details on its judgment on the merits of that site in paragraph 5.3.10 of the December 2024 ER;
- BTC's decision about Site W was reasonable, and reflected its concerns about the location of the site and the lack of information at that time; and
- the evidence from Hallam Land Management supports BTC's conclusions about the availability and deliverability of the proposed site allocation on land to the South West of Buckingham

7.45 In this context I am satisfied that the site has been selected in a robust way which is informed by the ER. As such I now turn to the policy details.

Policy Details

7.46 The policy takes a comprehensive approach to the allocation of the site. It is a major achievement for a neighbourhood Plan to identify a site of this scale. Furthermore, the policy's approach towards setting out a series of development principles is best practice. It provides clear advice for the preparation of planning applications on the site. The allocation sets out the need for a mix of residential, education, and local centre uses. This is a very positive approach and which has been designed to secure sustainable development.

7.47 The requirement for planning applications to be prepared in the context of an agreed masterplan appears towards the end of the policy and reads as an afterthought. I recommend that it is repackaged and included as an integral element of the opening element of the policy. I also recommend that the wording of the detailed elements of the policy is modified so that they read as development principles which will underpin the preparation of planning applications and their eventual determination. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development

Replace the initial element of Part A of the policy with:

'The Plan allocates land to the South West of Buckingham, as shown on the Policies Map, for a mix of residential, education, and local centre uses. Proposals should be made in the form of a comprehensive planning application prepared in the context of a masterplan that defines the land uses and sets out the key development guidance for access, layout, and design. In this context, development proposals for the land should demonstrate the way in which they meet the following principles:

Replace the opening elements of parts i) to viii) of the policy with:

- **The residential scheme should consist of approximately 800 dwellings,**
- **The education scheme should consist of the provision of**
- **The education scheme should be designed to facilitate**
- **The local centre should consist of workspace**
- **The transport strategy for the development of the site should incorporate:**

- **The design strategy for the site should respond positively to the relevant provisions**
- **The green infrastructure strategy should make provision**
- **The flood and sustainable drainage strategy should demonstrate'**

Delete Part ix)

HP4 Development Phasing and Contributions

- 7.48 The support text advises that specific contributions on major development sites allocated in this Plan are dealt with within the site-specific policies. It then comments that this policy broadly applies to any other housing development which may come forward within the Plan period. In this context the supporting text advises that the town has in the past suffered the consequences of a piecemeal approach to development resulting in infrastructure short fall. Part A of the policy therefore seeks to ensure that sites are not subdivided to purposely avoid the threshold for making develop er contributions.
- 7.49 Part B of the policy seeks to signal the BTC's ability to undertake the long-term management of community buildings and land.
- 7.50 In general terms I am satisfied that the policy takes a positive approach which is intended to secure sustainable development. In this context I recommend that Part A of the policy is modified so that it can be applied in a proportionate way. Part B of the policy is a combination of policy and supporting text. I recommend modifications so that it has a clearer format and to avoid repletion of the very helpful second paragraph of supporting text.
- 7.51 Otherwise the policy meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development

In Part A replace 'All housing developments, including infill and windfall sites' with 'As appropriate to their scale, nature and location, housing developments, including infill and windfall sites,'

Replace sentence of part B of the policy with: 'Wherever practicable, developers should engage with the Town Council.'

HP5 Housing Mix and Tenure

- 7.52 The supporting text advises that the policy retains the affordable housing threshold established in the made Plan. It also advises that there have been no instances of viability issues for proposals in delivering this policy requirement since the implementation of the policy, including a recent planning appeal judgement at Land West of Moreton Road and Castlemilk which maintained the position that 35% affordable housing accords with the Neighbourhood Plan and the provision of this percentage did not lead to viability issues.
- 7.53 A Housing Needs Assessment (HNA) was commissioned in October 2023. It recognises that it will be important to maximise the delivery of new affordable rented housing to address a current backlog, future-proof the stock, and provide homes for

households living in the wider rural hinterland. The policy therefore draws attention to this updated evidence and the importance of maximising affordable housing for social rent in the affordable housing delivery of schemes. It is expected that further local council updates will be produced, such as the Buckinghamshire Council's Local Housing Needs Assessment.

7.54 In general terms I am satisfied that the policy takes a positive approach to Section 5 of the NPPF. It is underpinned by the detailed and up-to-date HNA. Within this overall context, I recommend the following modifications to bring the clarity required by the NPPF and to allow BC to apply the policy consistently through the development management process:

- a recasting of Part B of the policy so that it more clearly relates to the development management process, and provides clarity on how the HNA information may be updated; and
- a recasting of Part C of the policy so that it more clearly relates to the development management process and acknowledges that bungalows may prove to be attractive to other persons rather than solely to downsizers.

7.55 In reaching this conclusion I have taken account of the representations from The Trustees of the Leonard Hill Will Trust/Ridgepoint Homes and Wheeldon Estates Limited. I note that the policy acknowledges that viability issues may result in a lower provision of affordable housing that required by its Part A.

7.56 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

Replace Part B of the policy with: 'Development proposals should provide a greater proportion of affordable housing for social rent in the overall tenure mix of affordable housing with the final tenure mix agreed taking account of the Buckingham Housing Needs Assessment, or any more up-to-date Assessments, and any other available evidence regarding local market conditions.'

Replace Part C of the policy with: 'New residential development should seek to include smaller dwellings (up to 3-bed) in their housing mix with an emphasis on types of homes which may be suitable for first time buyers and those looking to rent their first home, and downsizers. The number of smaller dwellings should be greater than 50% of the total in schemes of five or more dwellings. The provision of bungalows as part of the overall mix of homes will be particularly supported.'

DH1 The Buckingham Design Code

7.57 There are distinctive features of Buckingham that shapes its character, and these features are set out in the Buckingham Design Code Report. Its content is given full effect through the provisions of the policy by placing additional local emphasis to the design quality principles of VALP Policies BE2 and BE1 in respect of the characteristics of the Buckingham Conservation Area. It has been prepared and carries the full weight of the development plan in decision making. The policy requires that applicants should

demonstrate that they have full regard to the design principles and guidance the Code contains as relevant to the location of their proposals.

- 7.58 The Buckingham Design Code. It is an excellent document which captures the character of the town. In the round the policy takes an excellent approach and provides a local interpretation of Section 12 of the NPPF.
- 7.59 The final sentence of the policy is a process matter rather than a land use policy. As such I recommend that it is deleted and repositioned into the supporting text. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

Delete the final sentence of the policy.

At the end of the supporting text add:

‘3. Where a development proposal does not follow the requirements of the Code the applicant should explain the circumstances and make a case for the submitted scheme.’

DH2 Local Heritage Assets

- 7.60 This policy is intended to inform decision makers of the presence of what are referred to as ‘non-designated heritage assets’ when judging the effects of a development proposal in line with strategic VALP Policy BE1, identifying several buildings and structures and affording them protection commensurate with their significance.
- 7.61 I looked at a selection of the proposed assets during the visit. The justification for their selection was very clear. A description of each building on the list is included in Appendix D. In addition, the policy provides a local iteration of paragraph 209 of the NPPF. As such, the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

DH3 Retrofitting in the Conservation Area

- 7.62 This policy aims to increase the use of renewable energy in existing buildings within the Conservation Area, therefore increasing energy efficiency and lowering carbon emissions.
- 7.63 The policy takes a very positive approach to retrofitting in the Conservation Area and has regard to Sections 14 and 16 of the NPPF. It successfully marries the conservation agenda with the agenda on building construction and sustainability. As such, the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

DH4 Addressing the Performance Gap

- 7.64 The policy encourages the development of energy efficient homes to the Passivhaus standard.

7.65 The policy has three main elements as follows;

- offering support for proposals for Passivhaus or equivalent standard buildings with a space heating demand of less than 15KWh/m²/year;
- development proposals that would be 'zero carbon ready' by design by minimising the amount of energy needed to heat and cool buildings through landform, layout, building orientation, massing, and landscaping, will be supported; and
- advising that proposals for major development should be accompanied by a Whole Life-Cycle Carbon Emission Assessment, using a recognised methodology, to demonstrate actions taken to reduce embodied carbon resulting from the construction and use of the building over its entire life.

7.66 This is a good policy which has regard to Section 14 of the NPPF. Its non-prescriptive approach also has regard to the Written Ministerial Statement – Planning Local Energy Efficiency Standards Update (2023). In this context, the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

ENV1 Buckingham Green Ring

7.67 The policy establishes the principle of the Green Ring at Buckingham as a green infrastructure project and identifies its broad location on the Policies Map. It requires all development proposals within its broad location to make provision for its delivery and management and it resists the loss of any Green Ring land or associated features that cannot be justified'

7.68 This is an interesting and innovative policy which has regard to Section 16 of the NPPF. I recommend that the first sentence of Part B of the policy acknowledges that its ambitions that development proposals that lie within or adjoin the Green Ring should align their public open space requirements with its objectives, may not always be practicable. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

Replace the first sentence of Part B of the policy with: 'Development proposals that lie within or adjoin the Green Ring should, wherever practicable, align their public open space requirements with its objectives, so that they contribute to its successful formation and maintenance.'

ENV2 Green and Blue Infrastructure

7.69 The supporting text advises that the policy refines adopted VALP Policy I1 on Green Infrastructure by identifying the Green Infrastructure Network of Buckingham. It also advises that green infrastructure can be broadly defined as a network of high quality natural and semi-natural areas with other environmental features, which is designed and managed to deliver a wide range of ecosystem services and protect biodiversity in both rural and urban settings. This includes parks, public open spaces, allotments, wildlife corridors, watercourses and play areas. It also includes Railway Walk which

forms part of the Buckinghamshire Green way. The Policies Map shows the full extent of the Network.

- 7.70 The policy requires that all development proposals that lie within the network, or that adjoin it, should consider how they may improve it, or at the very least do not undermine its integrity of connecting spaces and habitats. This may mean that development layouts are designed to contribute to the network's effectiveness. Parts D and E of the policy respond to the biodiversity net gain (BNG) provisions of the Environment Act 2021, which became a statutory part of plan making and development management in February 2024 and April 2024 for small sites.
- 7.71 In general terms the policy takes a very positive approach to this matter and has regard to Section 15 of the NPPF. It responds positively to the existing natural and semi-natural areas in the town. I recommend a modification to the wording used in Part F so that it relates better to the development management process and provides the degree of clarity required for the decision-maker.
- 7.72 The University of Buckingham comments about the extent of the proposed area of 'Amenity Space' at Verney Park and the way in which encroaches into land within the Verney Park campus adjacent to the existing car park area. BTC acknowledged this issue in its response to the clarification note. I recommend accordingly.
- 7.73 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

In Part F replace 'Off-site measures will only be considered' with 'Off-site alternatives will only be supported'

Amend Fig 15 map to exclude the University land at the Verney Park campus.

ENV3 Urban Greening

- 7.74 The supporting text advises that the policy is inspired by the London Plan principle of an Urban Greening Factor (UGF) to encourage more and better urban greening as the prime means of increasing climate resilience. It also comments that Buckingham is an urban area and therefore with the same need and potential for this approach to help the town adapt to climate change. The model assists in determining the appropriate provision of urban greening for new developments and is explained in detail in Appendix E. Urban greening should be a fundamental and integral element of site and building design in the future incorporating measures such as high-quality landscaping (including trees), green roofs, green walls, and nature-based sustainable drainage.
- 7.75 I recommend that the policy is recast so that it has a general and then a specific element. I also recommend that the policy is applied where it is commercially-viable to do so. Such an approach would not conflict with BTC's helpful response to the clarification note. I also recommend consequential modifications to the supporting text.
- 7.76 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

Replace the policy with:

‘Proposals for major development on brownfield sites within the settlement boundary should contribute to the greening of Buckingham by including urban greening measures in the design of the buildings, hard surfacing, and landscape schemes.

Where it is commercially viable to do so housing proposals or mixed-use proposals that are housing-led should meet or exceed a Buckingham Urban Greening Factor of 0.4. All other major commercial development or buildings in other uses should meet or exceed a Buckingham Urban Greening Factor of 0.3.’

At the end of the third paragraph of supporting text add: ‘The second part of the policy acknowledges that there may be tension between urban greening and commercial viability. In this context proposals that do not incorporate the requirements of the second part of the policy should provide evidence that it would not be commercially viable using open-book calculations.’

ENV4 Private Outdoor Space

- 7.77 This policy retains the made neighbourhood plan policy provision which seeks to secure development where private external space is demonstrated which could be used for a combination of activities
- 7.78 I am satisfied that the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

ENV5 Local Green Spaces

- 7.79 The policy retains the local green space designations of the made neighbourhood plan and designates a series of additional Local Green Spaces (LGSs) in accordance with paragraphs 105 - 107 of the NPPF and VALP Policy NE6. The policy is underpinned by the LGS Report (Appendix F).
- 7.80 I looked at a selection of the LGSs during the visit.
- 7.81 I am satisfied that the LGS which were designated in the made Plan continue to meet the criteria in paragraphs 105 and 106 of the NPPF.
- 7.82 The University make detailed comments about the proposed LGS based around the former Railway Station Site (LGS E) and its relationship to a former planning permission on that site. BTC agreed to revise this matter based on its earlier decision at the pre-submission stage, and I recommend accordingly.
- 7.83 I am satisfied that the other proposed new LGSs meet the criteria in paragraphs 105 and 106 of the NPPF.
- 7.84 I recommend that the final sentence of the second part of the policy (on engagement with LGS owners) is deleted as it reads out of context. I am satisfied that BTC engaged appropriately with the relevant landowners.

- 7.85 With the incorporation of these modifications the policy and the supporting text meet the basic conditions. The approach taken will contribute to the local delivery of the social and environmental dimensions of sustainable development.

Amend the proposed area for the new Local Green Space E (at the rear of The Siding new development up to no.30 Lenborough Close) on Figure 17 to remove the land to the south of the existing car park to reflect the site associated with planning application 17/00746/APP.

Delete the final sentence of the second paragraph of the supporting text.

CLH1 Active and Sustainable Travel

- 7.86 This policy supports non-strategic VALP Policy T7 and refines it by defining Buckingham's existing Active and Sustainable Travel network on the policies map. It also goes a step further by showing additional local routes identified by the Town Council, in addition to those improvements identified in the Buckingham Transport Strategy contributing to the VALP's vision for Buckingham to provide active links within the town (high quality pedestrian and cycle routes), and in providing high-quality accessibility through the implementation of sustainable modes of travel.
- 7.87 The policy identifies the existing Sustainable Travel Network and opportunities for improvements for the purpose of prioritising active travel and encouraging the use of public transport. It also comments that development proposals on land that lies within or adjacent to the Network should avoid harm and should sustain and where practicable enhance the connectivity of the Network by virtue of their layout, means of access and landscape treatment.
- 7.88 In the round this is a positive policy which has regard to Sections 8 and 9 of the NPPF.
- 7.89 The University objects to the 'existing right of way' identified along Station Road and the Railway Walk which includes land owned by the University of Buckingham. It contends that whilst the Railway Walk forms part of a permissible path, this is not a formal public right of way and should not therefore be identified as such in the Plan. This matter was acknowledged by BTC in its response to the clarification note and it proposes that the details are relabelled. I agree and recommend accordingly.
- 7.90 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

Relabel Station Road and the Railway Walk on Figure 20 as a permissive right of way

CLH2 Development of the Canal Area

- 7.91 The supporting text comments that the 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 re-open 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.

- 7.92 The allocation extends to 11.6 hectares 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.
- 7.93 The supporting text advises that the land concerned 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. It also comments that 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 its main objectives are to promote the education of the public in the history and use of the canals and water ways 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.
- 7.94 I looked at the site carefully. Plainly it is an interesting and innovative policy and will help to celebrate the town's canal heritage. I note Manor Oak's support for the proposed development and the details in the policy. In this context I am satisfied that the policy is capable of delivery within the Plan period.
- 7.95 I recommend that the policy is slightly recast so that parts C to J become principles which will underpin the development of the site. This is achieved by introducing such a concept within Part B of the policy and modifications to the wording of parts C to J so that they read as development principles for the site. Where necessary I recommend the deletion of supporting text (and/or unnecessary details) from the policy, especially when such matters are already addressed in the supporting text.
- 7.96 Otherwise the policy meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development.

Replace Part B with:

'Development proposals should be underpinned by:

- **an illustrative masterplan that defines the land uses and sets out the key development principles for access, layout, and design;**
- **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**

- details about the way in which the proposal responds positively to the development principles in Part C to J of this policy.’

Replace C with: ‘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.’

In D and E replace ‘will’ in each first sentence with ‘should’

Replace F with: ‘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.’

Replace G with: ‘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.’

In H replace ‘The layout and landscaping scheme has particular regard’ with ‘The layout and landscaping scheme should have particular regard’

In I replace the various uses of ‘shall’ with ‘should’

In J replace ‘shall’ with ‘should’

At the end of paragraph 2 of the supporting text add: ‘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).’

CLH3 Health Facilities

- 7.97 The supporting text provides the context for this policy. It advises that in granting permission for residential development in the town, BC agreed for healthcare provision to be relocated from the existing GP surgery sites in Verney Close and North End, to a site on the Lace Hill development to the southeast of the town. The implementation of this relocation project is currently being pursued but relies on several factors to fall into place, including funding streams being approved by NHS England. Whilst the BTC will continue to lobby relevant stakeholders for solutions to maintain accessibility to healthcare provision for the whole town and the GP Practice itself is currently pursuing several options, enabling the redevelopment of the existing surgeries’ sites are required to contribute to the implementation of the scheme at Lace Hill, or alternative provision. The policy therefore seeks to update the current situation surrounding healthcare provision in Buckingham.
- 7.98 Plainly there is a complicated context to the policy. Nonetheless, it is summarised well in the supporting text.

- 7.99 I have noted the representation from The Swan Practice in its capacity as a primary healthcare provider and its commentary that the policy should incorporate mechanisms to scale healthcare infrastructure in response to population growth, to secure funding through Section 106 contributions to support new or expanded facilities and to facilitate integration of digital healthcare innovations to meet modern demands. On the one hand, these are important matters in ensuring high quality medical care in the town. However, on the other hand, they are operational rather than land use planning matters.
- 7.100 In general terms the policy takes a positive approach to the retention/expansion of health facilities in the town and has regard to Section 8 of the NPPF. In this broad context I recommend the following modifications to bring the clarity required by the NPPF and to allow BC to be able to implement the policy through the development management process:
- the recasting part B of the policy so that it can be applied in a proportionate basis (as submitted the policy would apply to proposals for single dwellings); and
 - recasting the final sentence of part C of the policy so that it acknowledges the role of a neighbourhood plan within the wider development plan.
- 7.101 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

Replace Part B with:

‘As appropriate to their scale, nature and location, residential development proposals will only be supported where they provide or improve the delivery of essential health and/or wellbeing facilities and services required to serve the scale of the development proposed. Proposals to meet increasing demand by expanding the Lace Hill health care facilities, the delivery of a new facility or the delivery of an alternative health care practice or practices will be supported.’

Replace the final sentence of Part C of the policy with: ‘Should the Lace Hill relocation project not be implemented, development proposals that would result in the loss of the existing established health care facilities will not be supported.’

CLH4 Art, Cultural, Sport and Recreation Facilities

- 7.102 The policy supports the provision of new sports and recreational facilities, with consideration given to how any such facilities are laid-out in the scheme to avoid preventing future expansion. In taking this approach, the policy is in line with VALP Policies I1 (strategic) and non-strategic policy I2. Another key focus of the policy is the support for a new community centre/hall and in doing so, both Policy CLH4 and strategic VALP Policy I1 emphasise the protection, enhancement, and provision of community facilities, ensuring they meet local needs and support community well-being.
- 7.103 The policy takes a very positive approach to art, cultural, sport and recreation facilities and has regard to Section 8 of the NPPF. As submitted, Part C of the policy is worded

in an unclear way. I recommend that it is recast to bring the clarity required by the NPPF.

- 7.104 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

Replace Part C of the policy with: ‘Development proposals coming forward for sports and recreational facilities should demonstrate that their layouts do not prevent the future expansion of the facilities provided.’

EE1 Buckingham Town Centre

- 7.105 The supporting text acknowledges that is now widely accepted that high streets need to diversify to become more community focussed in their use and to do so requires planning for a mix of different uses. It comments that whilst the focus for the established Primary Shopping Frontage is focussed on Class E uses, the wider Secondary Shopping Frontages provides an opportunity to focus on other town centre uses which not only includes retail, but also leisure, tourism, cultural and community as identified by VALP Policy D7. The policy therefore encourages other town centre uses in the Town Centre within the Secondary Shopping Frontage.
- 7.106 The supporting text also comments that it is also now widely accepted that residential uses (Class C3) in town centres contribute to maintaining and/or enhancing vitality and viability. The policy therefore also makes provision for Class C3 uses on upper floors ensuring that active frontages remain at ground floor level and access schemes do not harm frontages. Section B of the policy seeks to focus on those matters that the Town Centre Study highlighted as important in delivering town centre revitalisation for Buckingham.
- 7.107 This is a wide-ranging policy which addresses retail, commercial and residential uses. In general terms, it is a very good policy which has regard to Section 6 of the NPPF. In this broader context I recommend the following modifications to bring the clarity required by the NPPF:
- the introduction of a proportionate element in Part B;
 - that the Part B criteria should be in the plural to relate to its opening element; and
 - a simplification/clarification of Part E.
- 7.108 I note the Plan’s commentary about its intentions for an Article 4 Direction in para 1 of the supporting text and BC’s comment on this matter. The matter is properly addressed in the relevant part of the Plan and it will be a matter for local discussion and judgement should the Plan be made. In this context, I recommend that wording used in the second paragraph of the supporting text is modified – as submitted it assumes that a proposal for an Article 4 Direction will be supported by BC and not challenged at national level.
- 7.109 Otherwise the policy meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development.

Replace Part B of the policy with:

As appropriate to their scale, nature and location, development proposals within the defined Town Centre boundary will be supported where they can demonstrate that they:

- **improve the sense of arrival into the Town Centre;**
- **achieve a positive relationship with existing green infrastructure provision in the Town Centre and incorporate new green infrastructure in accordance with Policies ENV1 Green Infrastructure and ENV2 Urban Greening of this Plan;**
- **retain and, where practicable, enhance active travel routes to improve movement into and around the town in a healthy and safe manner in accordance with the Policy CLH1 of this Plan;**
- **contribute to the attractiveness of the Town Centre through public realm and streetscape enhancements; and**
- **contribute to the enhancement of public transport and accessibility in the town centre.**

Replace Part E of the policy with: ‘Development proposals that would involve the loss of ground floor floorspace to facilitate access to upper floor residential uses will be supported where this can be achieved without undermining the integrity and viability of the existing unit(s), and where the overall number of residential accesses would not detract from the vitality and viability of a shopping frontage.’

In 2 replace ‘In the meantime,’ with ‘In general terms,’

EE2 Employment

- 7.110 The Plan proposes the allocation of land west of London Road, as shown on the Policies Map, for 10 hectares of new employment development. The policy retains the made Neighbourhood Plan policy for this site. The Plan advises that given that the Tingewick Road Industrial Estate is not meeting current and projected future needs and has been allocated for residential development in Policy HP2, there remains a need to retain proposals for the development of employment land elsewhere in Buckingham.
- 7.111 Rainer Developments raises several matters on the policy including its ambitions for the residential led development of the site. Since the Plan was submitted planning permission has been granted on appeal for a mixed-use development on the site (23/00178/AOP). In these circumstances BTC suggested revised wording for the policy and the supporting text in its response to the clarification note.
- 7.112 I have considered carefully the appropriateness of retaining a policy for a site when planning permission has recently been granted. On the balance of the evidence, I am satisfied that this is the case. The policy will not directly affect the extant planning permission, and it will provide a degree of reassurance to the community about the

way in which housing and employment growth will be managed and balanced in the town. I recommend accordingly

- 7.113 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development.

Replace Part A of the policy with:

‘The Plan allocates land west of London Road, as shown on the Policies Map, for 1.7 hectares of new employment development as part of the approved residential-led development of the site (23/00178/AOP).’

Replace Part B of the policy with:

‘Employment development will be located on that part of the site closest to Buckingham Industrial Estate. The southern edge of the allocation will comprise a landscape buffer to protect the views between the site and the Padbury Valley. The remainder of the site will come forward as residential development in accordance with planning application 23/00178/AOP or any reserved matters applications relating to the outline planning permission.’

In the first paragraph of the supporting text. replace the first sentence with: ‘The policy reflects the recent appeal decision on the site for a mixed use residential-led development (23/00178/AOP)’

Delete the second paragraph of the supporting text.

Replace the third part of the policy with: ‘The development of the town as an employment area is key to ensuring that Buckingham does not become a dormitory town. With large employment development taking place at Silverstone this can be an opportunity for more jobs within Buckingham. It also considers the loss of the employment land through the loss of the Tingewick Road Industrial Estate and acknowledges the opportunities now provided for the employment use of part of the site which arise from the approved residential-led development.’

EE3 University of Buckingham

- 7.114 The supporting text advises that the University is an important establishment within the town and the way in which it delivers education provision may change over the Plan period. The policy therefore seeks to safeguard existing space used for educational purposes whilst supporting proposals for new buildings or the refurbishment of existing buildings. The Plan seeks to ensure that the growth of the University’s education services is accompanied with the provision of the necessary University accommodation needs.
- 7.115 I saw the importance of the University to the economic and social well-being of the town during the visit. I also saw that the University had contributed to the ongoing maintenance and upkeep of historic buildings. In general, a good policy which has regard to Sections 6, 8 and 16 of the NPPF.

- 7.116 The University supports the first part of Part B of the policy but suggests that the second part should be revised so that it offers support to new student accommodation building
- 7.117 The second sentence of part B of the policy looks to make a connection for development proposals at the University with meeting its accommodation needs. I sought advice from BTC on how it anticipate that this element of the policy would be applied through the development management process. In addition, I sought advice on the extent to which such an approach would be applied to proposals for new academic buildings in addition to those for the refurbishment/adaptation of existing buildings.
- 7.118 In its response to the clarification note, BTC advised that:
- ‘(Policy) EE3 B addresses the issue that a sudden increase in student numbers can have a negative effect on the Buckingham housing market as lack of University accommodation for students can spike rental prices as well as house prices if more HMOs are seen as a business proposition. There was such a spike in 2012 and was reflected in the current 2015 BNDP Policy.*
- In order to prevent similar events, the Town Council would ask that the University should provide evidence of an assessment that the proposed increase in students through the academic expansion or refurbishment of existing buildings [if the purpose is to increase overall student numbers through provision of teaching accommodation for new courses] that university accommodation was also being expanded or that existing accommodation could cope without significant number of students seeking accommodation.’*
- 7.119 I have considered these different approaches very carefully. In doing so I have sought to acknowledge that a qualifying body has considerable flexibility about what it wishes to include and not to include in its Plan. In this context, it would be inappropriate for me to recommend that the focus of the policy is revised to support proposals for additional student accommodation as proposed by the University. Plainly any such proposals will be assessed on their merits in the context of relevant development plan policies.
- 7.120 I have considered carefully BTC’s suggested revisions to the policy. On the one hand, they seek to respond to the University’s representation. On the other hand, they do not significantly affect the way in which the policy would be applied and the mechanical relationship between new/revised academic floorspace and student accommodation. In some cases, there may be a direct correlation between the two issues. In other case this will not be the case.
- 7.121 Based on all the evidence I recommend that Part B of the policy is recast so that it applies only to development proposals for academic buildings. I also recommend consequential modifications to the supporting text and which also incorporate some elements of BTC’s response to the clarification note. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development.

Replace Part B of the policy with: ‘Development proposals for new academic buildings and the modification of existing University buildings will be supported where they otherwise comply with development plan policies.’

Replace the supporting text with:

‘The University is an important establishment within the town and the way in which it delivers education provision may change over the Plan period. This may be through expansion or utilising existing space differently. The policy therefore seeks to safeguard existing space used for educational purposes whilst supporting proposals for new buildings or the refurbishment of existing buildings. The Town Council is aware of the effect of the expansion of the University on the Buckingham housing market. In this context, and where there is a direct relationship between the development of new academic buildings and student numbers, development proposals should provide proportionate evidence that the proposed increase in students associated with the development of new academic buildings or the refurbishment of existing academic buildings can be satisfactorily accommodated with the town’

EE4 Primary and Secondary School Provision

- 7.122 The policy seeks to safeguard existing educational provision in Buckingham. Part A of the policy therefore identifies existing sites on the Policies Map. Provision has been made for a new primary school to serve the town in site specific allocations. Part B of the policy safeguards land for the expansion of The Buckingham School.
- 7.123 The policy identifies existing primary and secondary school provision, for the purpose of protecting these sites for educational provision. In addition, land off Verney Park, is safeguarded for the expansion of The Buckingham School.
- 7.124 I am satisfied that the policy has regard to Section 8 of the NPPF and meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

I1 Water Management and Flood Risk

- 7.125 The Basic Conditions Statement advises that this policy supports strategic VALP Policy I4 by setting criteria for Flood Risk Assessments, seeking to manage flood risk, account for climate change impacts and prioritising the implementation of Sustainable Drainage Systems (SuDS). The policy also supports strategic VALP Policy I5 regarding wastewater infrastructure and early engagement. The policy does seek to go beyond the 110 litre per person per day water consumption standard for new homes. Instead, Policy I1 sets the standard of 100 litres per person per day which is in line with proposals in the DEFRA Plan for Water.
- 7.126 I am satisfied that the policy has regard to Section 14 of the NPPF, and responds positively to local circumstances and meets the basic conditions. As such the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

I2 Digital Infrastructure

- 7.127 This policy seeks to encourage the provision of new digital infrastructure that will drive technological advancements necessary to support new businesses and homes. In doing so it refines the provisions of VALP Policy I6 on telecommunications.
- 7.128 In general terms I am satisfied that the policy has regard to Sections 8 and 10 of the NPPF, and responds positively to local circumstances and meets the basic conditions. I recommend that the final sentence of Part A of the policy is slightly recast to bring the clarity required by the NPPF.
- 7.129 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

Replace the final sentence of Part A of the policy with: ‘Development proposals should be sensitively located and designed in order to minimise visual impact.’

Other Matters - General

- 7.130 This report has recommended a series of modifications both to the policies and to the supporting text in the submitted Plan. Where consequential changes to the text are required directly because of my recommended modification to the policy concerned, I have highlighted them in this report. However other changes to the general text may be required elsewhere in the Plan because of the recommended modifications to the policies. Similarly, changes may be necessary to paragraph numbers in the Plan or to accommodate other administrative matters. It will be appropriate for BC and BTC to have the flexibility to make any necessary consequential changes to the general text. I recommend accordingly.

Modification of general text (where necessary) to achieve consistency with the modified policies and to accommodate any administrative and technical changes.

Other Matters – Specific

- 7.131 BC comment that it would be clearer if the Settlement Boundary on Figure 6 is shown in a different colour to black or red and it should also show against the red boundary of the neighbourhood area so that the settlement boundary is clear. I recommend accordingly.

Revise the colour used for the Settlement Boundary on Figure 6.

8 Summary and Conclusions

Summary

- 8.1 The Plan sets out a range of policies to guide and direct development proposals in the period up to 2040. It is distinctive in addressing a specific set of issues that have been identified and refined by the wider community to safeguard the character and setting of the neighbourhood area and to support housing and employment development.
- 8.2 Following the independent examination of the Plan, I have concluded that the Replacement Buckingham Neighbourhood Development Plan meets the basic conditions for the preparation of a neighbourhood plan subject to a series of recommended modifications.

Conclusion

- 8.3 On the basis of the findings in this report, I recommend to Buckinghamshire Council that subject to the incorporation of the modifications set out in this report that the Replacement Buckingham Neighbourhood Development Plan should proceed to referendum.

Other Matters

- 8.4 I am required to consider whether the referendum area should be extended beyond the neighbourhood area. In my view, the neighbourhood area is entirely appropriate for this purpose and no evidence has been submitted to suggest that this is not the case. I therefore recommend that the Plan should proceed to referendum based on the neighbourhood area as approved by the former Aylesbury Vale District Council in November 2014.
- 8.5 I am grateful to everyone who has contributed to the examination of the Plan. The responses to the clarification note from the Town Council were both helpful and comprehensive.

Andrew Ashcroft
Independent Examiner
18 September 2025