



EDLESBOROUGH PARISH COUNCIL

15 Summerleys, Edlesborough, LU6 2HR

clerk@edlesborough-pc.gov.uk

01525229358

www.edlesborough-pc.gov.uk

Regulation 19 Buckinghamshire Local Plan Comments

The following comments relate to:

- **Chapter 6 – Site Allocations**
- **Policy SMA001 – Small site allocations for residential and residential led mixed development.**

Summary

Housing numbers assumed for edge of settlement greenfield sites in Edlesborough are overly ambitious. Predicted housing numbers will therefore not be achievable unless additional sites are introduced, especially if the capacity of the other edge of settlement sites in the Plan have been similarly over estimated.

Edlesborough Sites: Capacity of sites over estimated and sites possibly undeliverable due to lack of sewage infrastructure and Chiltern Beechwoods restrictions.

Northall Site: Fails to protect a community asset, lack of sewage infrastructure and Chiltern Beechwoods restrictions.

Note: Edlesborough Parish Council wishes to be involved in examination hearings relating to Policy SMA001.

Introduction

The draft Buckinghamshire Local Plan is fundamentally unsound because it is unlikely to be able to deliver the housing numbers claimed. In an effort to avoid allocating any of the potential Green Belt or even Grey Belt sites, which are predominantly in the south of the County, they have focussed on the greenfield sites that are mainly in the north of the County. However, in order to meet the exceptionally high housing numbers dictated by Central Government, they have had to assume some unrealistically high housing densities on the edge of settlement sites identified.

For the three major sites in Edlesborough, which are all edge of settlement sites, the Draft HELAA assumed housing densities of 30 and even 40dph. The current Vale of Aylesbury Design SPD states that edge of settlement housing densities should typically be less than 20dph (reference the delegated report regarding a recent planning application in the village, 25/01407/APP). Whilst the housing densities for the new edge of Edlesborough settlement

sites shown in the Regulation 19 Plan have been reduced somewhat, they are generally still well in excess of 20dph.

If this over ambitious allocation of housing numbers has been repeated throughout the Plan for other edge of settlement greenfield sites, there is little likelihood of it delivering the overall housing numbers claimed. The only solution would appear to be to bring more sites into the Plan, even if this means including some Grey Belt or possibly even Green Belt sites.

The Plan includes allocations amounting to 270 new homes in the parish ward of Edlesborough (which does not include the separate Dagnall or Northall wards). Using the standard housing needs calculation based on the latest Office for National Statistics 5 year affordability ratio for Buckinghamshire of 11.63, and the current housing stock of the ward of approximately 800 houses, gives an annual housing needs requirement of 14.5 houses per annum. Whilst the Plan is unclear about the precise completion dates for the Slicketts Lane site, it would appear that it is proposed to deliver all 270 houses in the 2028/33 five year period. That corresponds to 54 new homes per annum; almost four times the calculated housing need. Such an excess of new market housing in that short period would not be commercially viable and is therefore unlikely to be delivered.

Furthermore, there are also serious doubts regarding the deliverability of the Edlesborough and Northall sites, due to limited capacity at the Stanbridgeford Water Recycling Centre that serves both the villages. The Evidence Base identifies this lack of capacity at Stanbridgeford, but the issue does not appear to have been addressed in the Plan.

There are also acute access limitations at some of the sites, with one site actually being land locked. Finally, another site that is currently the subject of an outline planning application is being opposed by the Lead Local Flood Agency due to surface water flooding concerns. All these issues further question the deliverability of sites in question.

Individual assessments of the proposed allocation sites in the Parish are outlined below.

Ford Lane, (Swallowfields), Edlesborough

UNSOUND PROPOSAL

REASONS:

Housing Density

The proposed housing density of this site at 24dph, whilst better than the 30dph suggested in the draft HELAA, is still excessive for an edge of settlement development. An application to build 64 houses on this same site (equivalent to 17dph), was refused in 2019 (application 17/01467/AOP). That application was made by Cala Homes, and they concluded that after making the appropriate allowances to provide the necessary infrastructure for SUDS, highways and footways and open space etc. to mitigate the impacts of the development, they could only accommodate 64 homes on the site. That is a strong indication that the 90 houses proposed in the Plan would not be achievable.

A recent application for 24 houses on an edge of settlement application on the other side of the village (25/01407/APP) was refused, and one of the reasons was because the Case Officer considered the housing density to be excessive. The relevant extract from the Officer's report was:

*"Turning first to the density, Policy BE4 of the VALP states that proposed densities should generally constitute effective use of the land and reflect the densities of their surroundings, and will be appraised on a site-by-site basis to ensure satisfactory residential amenity. Where large scale developments are proposed particularly towards the edge of settlements, higher density areas should be located towards the centre of the site whilst the rural edge should be of a lower density. The Vale of Aylesbury Design SPD sets out that sites at the edge of villages should generally adopt a lower density of typically **less than 20 dwellings per hectare**, usually through seeking larger residential properties set within often well-vegetated, generous plots. Landscape treatment and retention and reinforcement of existing mature vegetation are both important components of achieving a coherent and in keeping grain and density."*

It therefore follows that if included in the Plan, for this site is to accord with the NPPF's desire to maintain an area's prevailing character, the housing density would need to be less than 20dph to be deliverable.

Outside The Defined Settlement Boundary

The site is in open countryside beyond the settlement boundary defined in the Edlesborough Parish Neighbourhood Plan. One of the reasons that the earlier

application to develop this site (17/01467/AOP) was refused was because it *“would constitute an unacceptable urbanising of a rural location, outside of the Settlement Boundary, and would result in loss of open countryside, harm to the intrinsic rural character of the village and adverse impacts on landscape character (including but not limited to the setting of the adjacent Area of Attractive Landscape).”*

It should also be noted that the site was also submitted for consideration in the previous HELAA and rejected as unsuitable on landscape grounds. The landscape has not changed since then, so what makes it now suitable for development?

Sewage Provision

Sewage provision for the site is an issue due to its remote location at the very edge of the village, especially if the nearby Slicketts Lane site is adopted.

When the Edlesborough village sewage network was installed in the early 1970s, the 1972 Village Plan gave the population of the village proper as approximately 650, corresponding to about 260 dwellings. By the time of the 2021 Census that had tripled to approximately 800 houses, so unsurprisingly the system is now struggling to cope with the current demand, with pinch points causing frequent back-ups. If all the sites included in the draft plan are brought forward at the proposed housing densities, the system will need to cope with a further 270 homes. That is more than four times the capacity the system was designed for, which cannot be accommodated without a comprehensive upgrade. There is no evidence that Anglian Water have any such upgrade planned.

Furthermore, the waste water recycling centre (WRC) at Stanbridgeford in Bedfordshire, which serves Edlesborough and Northall, is already at capacity. This is evidenced by the fact that Anglian Water opposed a recent planning application for 24 houses in Edlesborough (application 25/01407/APP) on the grounds that the WRC lacks the capacity to accommodate the additional flows of just 24 extra homes.

The Evidence Base supporting the Plan includes a report by JBA Consultants, commissioned by Buckinghamshire Council to undertake a Water Cycle Study. The report is entitled Water Cycle Report Level 1, and page 193 includes a summary of Anglian Water’s comments on water recycling centre capacities, which states:

“AW considers that Stanbridgeford WRC does not have capacity to serve growth. Growth in Buckinghamshire at Edlesborough for example would require new capacity to be built so would not comply with the sustainability hierarchy.”

The catchment area of the Stanbridgeford WRC is essentially the villages in the south west of Central Bedfordshire, which include Stanbridge, Billington, Eggington, Tilsworth, Hockcliffe, Eaton Bray, Totternhoe and Tilsworth. The inclusion of the Buckinghamshire villages of Edlesborough and Northall is something of an historical anomaly. It is

therefore apparent that whilst Anglian Water will presumably be obliged to develop Stanbridgeford WRC to accommodate the anticipated expansion of the Bedfordshire villages that it serves, they are unwilling to accommodate any further Buckinghamshire growth.

This questions the deliverability of the proposed growth of Edlesborough and Northall included in the Plan.

Pedestrian Access

Another of the reasons the earlier application was refused was because: *“The location of the site is such that it has only limited access by non-car modes of travel. The absence of adequate infrastructure and the site’s remoteness from major built up areas are such that occupiers of the development are highly likely to be reliant on the use of the private car which would be contrary to the NPPF which seeks to focus significant development in locations which are or can be made sustainable and to the aims of Buckinghamshire’s Local Transport Plan 4. The site would not be capable of providing acceptable safe and suitable pedestrian access to the village.”*

Chiltern Beechwoods

Delivery of the site cannot be assured. The site is within the Chiltern Beechwoods SAC zone of influence, and any development of more than nine houses will require the establishment of a SANG within 5km or capacity at a gateway site.

Delivery Timescale

The Appendix F table listing the anticipated delivery trajectories of proposed allocations shows the completions for this site commencing in 2030/31. This would seem to be rather optimistic, bearing in mind all the issues that would need to be resolved before detailed planning could even commence.

Glebe Land, St Mary's Glebe, Edlesborough

UNSOUND PROPOSAL

REASONS:

Housing Density

The proposed housing density of this site at 24dph, is quite inappropriate and excessive for a site that stretches out into open countryside. A recent application for 24 houses in an adjacent field (25/01407/APP) was refused recently, and one of the reasons was because the Case Officer considered the housing density to be excessive. The relevant extract from the Officer's report was:

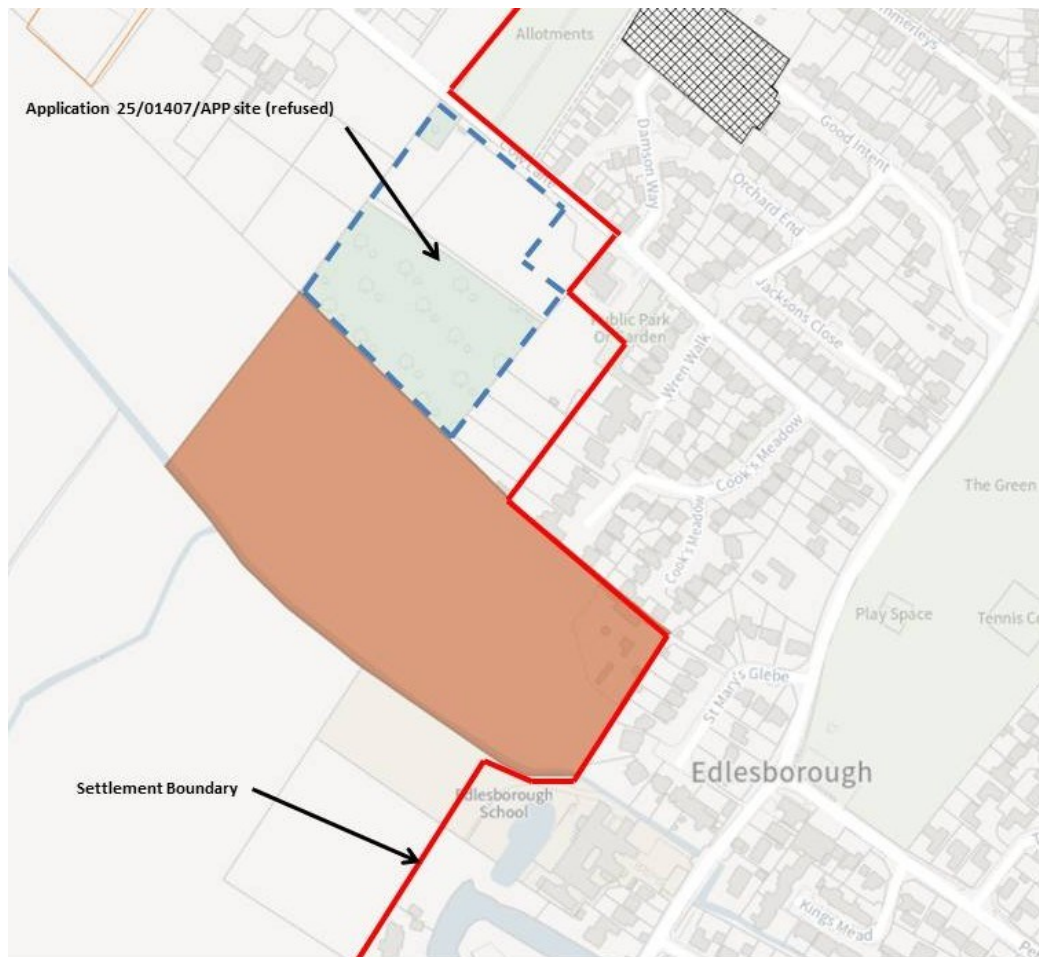
*"Turning first to the density, Policy BE4 of the VALP states that proposed densities should generally constitute effective use of the land and reflect the densities of their surroundings, and will be appraised on a site-by-site basis to ensure satisfactory residential amenity. Where large scale developments are proposed particularly towards the edge of settlements, higher density areas should be located towards the centre of the site whilst the rural edge should be of a lower density. The Vale of Aylesbury Design SPD sets out that sites at the edge of villages should generally adopted a lower density of typically **less than 20 dwellings per hectare**, usually through seeking larger residential properties set within often well-vegetated, generous plots. Landscape treatment and retention and reinforcement of existing mature vegetation are both important components of achieving a coherent and in keeping grain and density."*

This site is actually beyond the current edge of the settlement, and it therefore follows that if included in the Plan, the housing density would need to be less than 20dph for it to be in accord with the NPPF's desire to maintain an area's prevailing character.

Outside The Defined Settlement Boundary

The site is in open countryside and entirely beyond the settlement boundary as defined in the Edlesborough Parish Neighbourhood Plan and would constitute an unacceptable extension of the built form into open countryside. One of the reasons for the recent refusal of an application (25/01407/APP) in the adjacent field was: *"The proposed development would result in the harmful urbanisation of an existing green parcel of land which contributes positively to the rural setting and appearance of the village in this location to the detriment of its landscape character."* That observation applies equally (if not more so) to this site.

The map extract below shows the relationship of the proposed site with the settlement boundary as defined in the made Edlesborough Parish Neighbourhood Plan and the site of the recently refused application for housing development in the adjacent field.



Even if access to the site could be achieved, the extent of the site would need to be considerably reduced, so that it rounded off the settlement boundary, rather than creating an extension on three sides into open countryside.

Site Access

The site is currently landlocked from the public highway system, as can be seen from the above map extract, so is unlikely to be deliverable for a development of this size. Even if additional land was acquired to provide access to the site from Cow Lane, HELAA site 3382 (Westmead Kennels which is also in Cow Lane) was rejected due to unsuitable access.

Sewage Provision

When the Edlesborough village sewage network was installed in the early 1970s, the 1972 Village Plan gave the population of the village proper as approximately 650, corresponding to about 260 dwellings. By the time of the 2021 Census that had tripled to approximately 800 houses, so unsurprisingly the system is now struggling to cope with the current demand, with pinch points causing frequent back-ups. If all the sites included in the draft plan are brought forward at the proposed housing densities, the system will need to cope with a further 270 homes. That is more than four times the capacity the system was designed for, which cannot be accommodated without a comprehensive upgrade. There is no evidence that Anglian Water have any such upgrade planned.

Furthermore, the waste water recycling centre (WRC) at Stanbridgeford in Bedfordshire, which serves Edlesborough and Northall, is already at capacity. This is evidenced by the fact that Anglian Water opposed a recent planning application for 24 houses in Edlesborough (application 25/01407/APP) on the grounds that the WRC lacks the capacity to accommodate the additional flows of just 24 extra homes.

The Evidence Base supporting the Plan includes a report by JBA Consultants, commissioned by Buckinghamshire Council to undertake a Water Cycle Study. The report is entitled Water Cycle Report Level 1, and page 193 includes a summary of Anglian Water's comments on water recycling centre capacities, which states:

"AW considers that Stanbridgeford WRC does not have capacity to serve growth. Growth in Buckinghamshire at Edlesborough for example would require new capacity to be built so would not comply with the sustainability hierarchy."

The catchment area of the Stanbridgeford WRC is essentially the villages in the south west of Central Bedfordshire, which include Stanbridge, Billington, Eggington, Tilsworth, Hockcliffe, Eaton Bray, Totternhoe and Tilsworth. The inclusion of the Buckinghamshire villages of Edlesborough and Northall is something of an historical anomaly. It is therefore apparent that whilst Anglian Water will presumably be obliged to develop Stanbridgeford WRC to accommodate the anticipated expansion of the Bedfordshire villages that it serves, they are unwilling to accommodate any further Buckinghamshire growth.

This questions the deliverability of the proposed growth of Edlesborough and Northall included in the Plan.

Provision for extension of the Village School

A portion of the site is reserved under Policy EP7 of the Edlesborough Parish Neighbourhood Plan for possible expansion of Edlesborough School. Consequently, not

all the area of the site shown on the map would be deliverable for housing development.

Chiltern Beechwoods

Delivery of the site cannot be assured. The site is within the Chiltern Beechwoods SAC zone of influence, and any development of more than nine houses will require the establishment of a SANG within 5km or capacity at a gateway site.

Delivery Timescale

The Appendix F table listing the anticipated delivery trajectories of proposed allocations shows the completions for this site commencing in 2030/31. This would seem to be quite unrealistic, bearing in mind all the infrastructure and access issues that would need to be resolved before detailed planning could even commence.

Slicketts Lane, Edlesborough

UNSOUND PROPOSAL

REASONS:

Deliverability

This is an expansion of Site EDL021 allocated in Policy EP4 of the Edlesborough Parish Neighbourhood Plan but enlarged from 2.24ha to just over 4ha, increasing the maximum capacity from 40 homes to 80 homes. Policy EP4 reserved the additional land now being included as a provision, viz:

“In addition, the Neighbourhood Plan reserves the land outside the Settlement Boundary, as shown on the Policies Map, for a housing development beyond the Plan period. The land will only be released for development within the Plan period in one or more of the following situations:

- The adopted Local Plan requires a greater number of new homes to be met in Edlesborough Village for the Plan period to 2033 than has already been committed or provided for in the Neighbourhood Plan.*
- If a sufficient number of the sites allocated in the Plan fail to come forward during the life of the Plan leading to a failure in the Plan’s ability to deliver the number of new homes necessary to meet the Local Plan allocation for Edlesborough Village.”*

However, since the site’s inclusion in the Neighbourhood Plan, serious problems with its deliverability have become evident. Planning application 17/02539/AOP for the 40 house site was submitted in 2017 and is still awaiting determination 9 years later. Some of the reasons for the delay are outlined below, but if it has not been possible to deliver the 40 home site in 9 years, it is very questionable if an 80 house development can be delivered under this plan.

It is noteworthy that this site is not included in the Appendix F table showing the anticipated completion trajectories of the proposed allocations and sites that have been previously allocated but the capacity increased. The capacity of this site has increased from 40 houses in the current plan to 80 houses in the new plan, so its omission from the table is somewhat puzzling. The latest 5YHLS Position Statement shows the anticipated delivery of the first 20 houses in 2028/29 and the remaining 20 in 2029/30, but based on experience to date, that seems highly unlikely.

Housing Density

The housing density assumed for the 40 house site in the Neighbourhood Plan was 17.8dpa, which was considered reasonable for an edge of settlement development. It remains consistent with the Case Officer's report relating to a recent edge of settlement application on the other side of the village (application 25/01407/APP), which stated:

*"Turning first to the density, Policy BE4 of the VALP states that proposed densities should generally constitute effective use of the land and reflect the densities of their surroundings, and will be appraised on a site-by-site basis to ensure satisfactory residential amenity. Where large scale developments are proposed particularly towards the edge of settlements, higher density areas should be located towards the centre of the site whilst the rural edge should be of a lower density. The Vale of Aylesbury Design SPD sets out that sites at the edge of villages should generally adopt a lower density of typically **less than 20 dwellings per hectare**, usually through seeking larger residential properties set within often well-vegetated, generous plots. Landscape treatment and retention and reinforcement of existing mature vegetation are both important components of achieving a coherent and in keeping grain and density."*

If the 17.8dpa housing density is applied to the full 4.04ha site, it could only deliver a maximum of 72 new homes and not 80.

Sewage Provision

Sewage provision for the site is recognised as being a limiting factor due to its remote location. Doubling the housing allocation would make that issue even more critical, especially if the Ford Lane site is also developed.

When the Edlesborough village sewage network was installed in the early 1970s, the 1972 Village Plan gave the population of the village proper as approximately 650, corresponding to about 260 dwellings. By the time of the 2021 Census that had tripled to approximately 800 houses, so unsurprisingly the system is now struggling to cope with the current demand, with pinch points causing frequent back-ups. If all the sites included in the draft plan are brought forward at the proposed housing densities, the system will need to cope with a further 270 homes. That is more than four times the capacity the system was designed for, which cannot be accommodated without a comprehensive upgrade. There is no evidence that Anglian Water have any such upgrade planned.

Furthermore, the waste water recycling centre (WRC) at Stanbridgeford in Bedfordshire, which serves Edlesborough and Northall, is already at capacity. This is evidenced by the fact that Anglian Water opposed a recent planning application for 24

houses in Edlesborough (application 25/01407/APP) on the grounds that the WRC lacks the capacity to accommodate the additional flows of just 24 extra homes.

The Evidence Base supporting the Plan includes a report by JBA Consultants, commissioned by Buckinghamshire Council to undertake a Water Cycle Study. The report is entitled Water Cycle Report Level 1, and page 193 includes a summary of Anglian Water's comments on water recycling centre capacities, which states:

“AW considers that Stanbridgeford WRC does not have capacity to serve growth. Growth in Buckinghamshire at Edlesborough for example would require new capacity to be built so would not comply with the sustainability hierarchy.”

The catchment area of the Stanbridgeford WRC is essentially the villages in the south west of Central Bedfordshire, which include Stanbridge, Billington, Eggington, Tilsworth, Hockcliffe, Eaton Bray, Totternhoe and Tilsworth. The inclusion of the Buckinghamshire villages of Edlesborough and Northall is something of an historical anomaly. It is therefore apparent that whilst Anglian Water will presumably be obliged to develop Stanbridgeford WRC to accommodate the anticipated expansion of the Bedfordshire villages that it serves, they are unwilling to accommodate any further Buckinghamshire growth.

This questions the deliverability of the proposed growth of Edlesborough and Northall included in the Plan.

Vehicular & Pedestrian Access

Vehicular and pedestrian access is another recognised limitation of this site. The local highway infrastructure serving the site is extremely poor and restricted, which would also be seriously exacerbated by a doubling of the housing allocation for the site, again compounded if the Ford Lane site is also developed.

Surface Water Flooding

Part of this site is currently the subject of an outline planning application (17/02539/AOP), which the Lead Local Planning Authority (LLFA) is opposing due to surface water flooding concerns.

“The LLFA objects to the proposed development due to concerns regarding the updated surface water drainage scheme.

Surface Water Flood Risk Photographs within public representations show flooding along Slicketts Lane and Dove House Close. The Risk of Flooding from Surface Water map (RoFSW) provided by the Environment Agency shows that at the junction for the proposed access road with Slicketts Lane, there is a high risk of surface water flooding (meaning there is greater than a 3.3% likelihood of flooding occurring in a given year).”

That objection was lodged in June 2023 and yet 3 years on there is still no record on the Public Access website of any solution to the problem. Whilst a solution may eventually emerge, it is yet further evidence that delivery of this site is very questionable.

Chiltern Beechwoods

Delivery of the site remains uncertain. The site is within the Chiltern Beechwoods SAC's zone of influence and any development of more than nine houses will require the establishment of a SANG within 5km or capacity at a gateway site. That is one of the reasons why the existing 40 house application (17/02539/AOP) for the site remains undetermined 9 years after submission.

Travellers Site, Cow Lane, Edlesborough

UNSOUND PROPOSAL

REASONS:

Planning Status of the Site

Parish Council records show that retrospective permission to site 3 mobile homes together with a day room was originally granted on appeal in 1992. The Inspector ruled that whilst the site was in open countryside and permission would not normally be granted. However, it was allowed in this case because of the applicant's gypsy status and the chronic ill health of his wife that prevented her continuing a travelling life style. The Inspector granted permission solely for the benefit of Mr W. Ray (senior), his two sons Mr W Ray (junior) and Mr S. Ray, and their dependants.

The Parish Council have always interpreted this to mean that the permission to use the site for residential purposes does not apply to the land per se, and if the ownership passes outside the Ray family, the permission will lapse. By the same token, residential occupation of this site by anyone other than Mr Ray, his two sons and their dependants is not allowed.

In the intervening period Mr W. Ray (senior) and his wife have died, and the Council's understanding is that the site is still occupied by the two sons and their dependants (although none of the residents of the site appear on the Electoral Register). Other than approval in 2003 to extend the day room, the planning status of the site has not changed, which suggests that whilst it is legally occupied by the Ray family who are recognised as travellers, it is not formally recognised as a travellers' site per se.

Consequently if 3 additional traveller & gipsy pitches are planned for the site, the planning status of the site will first need to change.

Access to the Site

The site is at the very end of Cow Lane, which is single track for much of its length, so access is limited. The site currently generates a significant amount of traffic and doubling the number of pitches allowed would double the amount of traffic, which could significantly impact highway safety. It should be noted that HELAA site 3382 (Westmead Kennels which is also in Cow Lane) was rejected due to unsuitable access.

Land Associated with the Swan, South End Lane, Northall

UNSOUND PROPOSAL

REASONS:

Endangers a Community Asset

This site includes not only a disused orchard belonging to the Swan public house, but it also includes the pub car park. Clearly a rural village pub on a busy road without a car park would no longer be viable. The Swan is considered to be a community asset, and it must retain a car park if it is to continue serving the local community. The inclusion of the car park within the designated site would threaten the future viability of the pub and as such would be contrary to Policy SE4 of the draft plan.

Housing Allocation is Unrealistic

The allocation for this site is 15, based on a site area of 0.5ha and a housing density of 30dph. However, there is currently a planning application for this site (PL/26/00191/FA) awaiting determination which proposes to build 9 houses on the site. Although the area of the site including the orchard, the access from South End Lane and the pub car park amounts to 0.49ha, the built portion is limited to just the orchard. The orchard makes up approximately 75% of the total site, so the housing density of the built portion equates to approximately 25dph. That is approaching the target dph figure of 30, but the number of houses is a long way short of the 15 shown in the draft plan.

Sewage Provision

The waste water recycling centre (WRC) at Stanbridgeford in Bedfordshire, which serves Edlesborough and Northall, is already at capacity. This is evidenced by the fact that Anglian Water opposed a recent planning application for 24 houses in Edlesborough (application 25/01407/APP) on the grounds that the WRC lacks the capacity to accommodate the additional flows of just 24 extra homes.

The Evidence Base supporting the Plan includes a report by JBA Consultants, commissioned by Buckinghamshire Council to undertake a Water Cycle Study. The report is entitled Water Cycle Report Level 1, and page 193 includes a summary of Anglian Water's comments on water recycling centre capacities, which states:

“AW considers that Stanbridgeford WRC does not have capacity to serve growth. Growth in Buckinghamshire at Edlesborough for example would require new capacity to be built so would not comply with the sustainability hierarchy.”

The catchment area of the Stanbridgeford WRC is essentially the villages in the south west of Central Bedfordshire, which include Stanbridge, Billington, Eggington, Tilsworth, Hockcliffe, Eaton Bray, Totternhoe and Tilsworth. The inclusion of the Buckinghamshire villages of Edlesborough and Northall is something of an historical anomaly. It is therefore apparent that whilst Anglian Water will presumably be obliged to develop Stanbridgeford WRC to accommodate the anticipated expansion of the Bedfordshire villages that it serves, they are unwilling to accommodate any further Buckinghamshire growth.

This questions the deliverability of the proposed growth of Edlesborough and Northall included in the Plan.

Chiltern Beechwoods

Delivery of the site cannot be assured. The site is within the Chiltern Beechwoods SACc zone of influence and any development of more than nine houses will require the establishment of a SANG within 5km or capacity at a gateway site.