



RE:

Local Plan Team
Aylesbury Vale DC
The Gateway
Gatehouse Road
Aylesbury
HP19 8FF

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Dear Mr Broadley

Vale of Aylesbury Local Plan – Draft Plan response

Thank you for the opportunity to respond to the consultation on the Draft Vale of Aylesbury Local Plan (VALP). A consultation team was delegated with responsibility to progress a response to the Consultation on behalf of Thame Town Council.

1. Introduction

- 1.1. In general, we are limiting our comments to the impact on Thame. That impact is substantial, quite transparent, even deliberate, and cannot progress without the strongest possible challenge. Aylesbury Vale District Council (AVDC) is being presumptuous in its reliance on Thame.

2. General

- 2.1. By 2033 the VALP is looking to build at least 33,000 homes across the Vale, of which 12,000 are to accommodate unmet needs from neighbouring Councils (Wycombe District Council, Chiltern, and South Bucks). Its solution to this problem seems to be to allocate a large proportion of them on the Oxfordshire border.

3. Thame Background

- 3.1. The existing adopted Thame Neighbourhood Plan (TNP) as approved by the community of Thame in 2013 via a referendum provides all the fully sustainable growth needed by Thame up until 2027. In practice housing provision is being front loaded as opposed to being developed over the whole life time of the plan, whereas infrastructure delivery lags behind, thus severely testing Thame's services.
- 3.2. Thame Town Council held a public meeting on the South Oxfordshire District Council (SODC) and VALP consultations on Thursday 4 August 2016, with more than 300 people in attendance at St Mary's Church – standing room only. The general consensus appeared to be that there was great concern at what was being proposed for Thame, in relation to both the threat of extra housing numbers and that required infrastructure must be provided ahead of housing. The further impact of substantial development at Haddenham can only take Thame to breaking point.

4. Duty to cooperate (with SODC)

- 4.1. There is little evidence of cooperation with SODC in relation to the impact on Thame of VALP's proposals for both Haddenham expansion and the proposed new settlement.
 - 4.2. SODC's last consultation stated that '*we have and will continue to work with our neighbouring councils on cross boundary issues*' and '*understanding the nature of our towns and villages and how they inter-relate and link with places outside the district is vital*'. However, there is little evidence of engagement, cross border cooperation, or joined up thinking between SODC and Aylesbury Vale.
 - 4.3. At a meeting between Thame Councillors and SODC on 14 June 2016, both the Leader and the Senior Planning Officer of SODC denied any knowledge of AVDC's draft plan or of its likely impact on Thame.
 - 4.4. There is no mention in the SODC proposals of the intended approximately 5,550 new dwellings in or close to Haddenham, (in a separate District/County) which will add an extra burden on all of Thame's infrastructure, but not provide for it. The level of housing proposed for Haddenham within the VALP needs to be considered alongside that proposed for Thame within the SODC Local Plan 2032 Preferred Options document. When viewed with consideration to current allocations, permitted developments and future windfall the proposals for an extra 600 homes means that the population of Thame could grow as high as 15,000 people.
 - 4.5. The VALP proposals for Haddenham for a potential further 5,000 homes means that it would be probable that the population of Haddenham would also reach the 15,000 mark. Together with the growth in population at Thame this would fundamentally change the character and nature of the two settlements within their historic landscape. Furthermore, the VALP proposal at Haddenham alone threatens the vision of the TNP that Thame maintains its character as a "real market town" (TNP, 4.2). This character was defined within the TNP as "a small town in the countryside which has a regular market and acts as a centre for surrounding farms and villages". There appears to have been no conversation between AVDC and SODC around the likely impact on cross-border settlements.
 - 4.6. The VALP proposal for a new settlement on the Oxfordshire border takes no account of the fact that SODC are also planning a new settlement not that far away from Thame (6/8 miles). This has been narrowed down to two options within the draft SODC Local Plan 2032 Preferred Options document; either one of at least 3,500 homes and 10 ha of employment land at Chalgrove, or an alternative site at Harrington of up to 6,500 homes, 23 ha of employment land, and an 11 ha motorway depot.
5. Wycombe District unmet need
- 5.1. An entire new settlement of at least 4,500 homes (and potentially over 6,000) is recommended to be grafted onto Haddenham by the year 2033 to meet Wycombe District Council's (WDC's) needs, yet densities proposed in High Wycombe itself are extremely low and apparently in the range of 10 – 15 dwellings per hectare (dph). If WDC adopted a more realistic approach to density, WDC could meet its own need within its borders.
 - 5.2. WDC's review of green belt appears to be conservative compared with the approach of other Districts with green belt constraints but which are recognising that the level of housing need requires exceptional response. Meanwhile it is proposed that the 60 hectares identified for release will contribute 900 homes. This represents a density of just 15 dph and is not acceptable.
 - 5.3. WDC is allowing lower housing densities in its own area, thereby forcing more houses elsewhere to accommodate its unmet need.
 - 5.4. We know that other Local Plans include some green belt development, including Vale of White Horse, Gloucester/Cheltenham/Tewkesbury, Leeds, Greater Nottingham, Stratford-on-Avon District, South Derbyshire and Cambridge City, so there should be no reason why

Wycombe cannot do more. Allowing some development in the Wycombe Green Belt would reduce the need to travel to employment sites in Wycombe.

5.5. AVDC must challenge the unmet needs from other Districts, question the reluctance to allocate sufficient green belt land, and highlight the inequity in proposed housing densities.

5.6. All the above leads us to question the need for a new settlement.

6. Thame Infrastructure

6.1. Bucks County Council (BCC) stated in their response to the VALP Issues and Options Consultation, October 2015, that *“the options fail to recognise the significance of growth centres around the Vale e.g Thame, Bicester, Brackley, Silverstone, and Milton Keynes. For example the proposed growth at Thame and Princes Risborough may present an opportunity for significant growth at Haddenham, perhaps as a new settlement”*. It would seem that this approach has given AVDC licence to assume that they can rely on Thame’s infrastructure. It should also be noted that none of BCC’s suggestions are within BCC’s jurisdiction.

6.2. How can BCC evidence ‘growth plans for Thame’ when SODC are still in their consultation phase?

6.3. In the VALP document, page 66, para 4.35 it clearly states that *“the site at Haddenham is marginally preferable because it already has a railway station with a good service. In addition Haddenham is close to the higher order services provided by Thame, is closer to a range of employment locations and to the motorway network”*. ***There could not be a clearer statement of the VALP’s deliberate strategy to develop for commuter demand and rely on Thame for infrastructure.***

6.4. Following the numbers allocated in the Thame Neighbourhood Plan, and the faster than anticipated delivery, Thame’s resources are heavily stretched. Town centre parking, GP facilities, school capacity, etc are all under pressure, and we are particularly concerned about secondary school capacity. This school capacity issue is exacerbated by increasing demand from Long Crendon and Haddenham.

6.5. The SODC Local Plan 2032 consultation document concentrates on the allocation of additional housing numbers, retail provision and employment allocation rather than clear definition of infrastructure needs / provision. It is clear that Thame’s current infrastructure deficiencies, never mind future needs emerging from windfall sites and the further 600 homes and 2.5ha of employment land proposed in the draft SODC Plan, are not being addressed. These deficiencies can only be exacerbated by the proposals contained within the VALP.

6.6. Planned housing growth for Thame from 2011 to 2027 as defined by existing Core Strategy / Neighbourhood Plan is already 19% (4875+162+775). With known and conservatively projected unplanned windfalls which cannot be prevented (+233+400) it will be 32% by 2032. With 600 extra dwellings as proposed by SODC it will be 44%. Coping with Thame’s expected growth is enough of a challenge without having a large new settlement on our doorstep but just over the County boundary.

6.7. It is totally unacceptable that Aylesbury Vale identifies Thame as a growth town and uses that as a justification to allocate 1000+ new homes in Haddenham, plus the threat of a new settlement. They cannot be allowed to rely on our already overstretched infrastructure.

6.8. The SODC consultation includes the objective to *‘ensure that essential infrastructure is delivered to support our existing residents and services as well as growth’* which implies that there are existing infrastructure deficiencies. The SODC consultation acknowledges Thame’s infrastructure deficiencies such as *‘secondary school at or close to capacity’*, *‘provision of health services needs to be improved’*, *‘lack of leisure and community*

facilities', and a need to *'improve car parking'*. These points are not addressed further but we are still expected to accommodate extra homes in Thame, and are now also threatened with very substantial new development just over the border in Aylesbury Vale. This is likely to lead to significant problems in Thame throughout the remainder of the plan period, which will be seriously exacerbated by the development proposed within the VALP.

- 6.9. New housing needs to be sustainable and not dependent on already overstretched resources. Expansion in Haddenham, and especially any new settlement, should not be reliant on Thame for infrastructure and support services.
- 6.10. It was recognised at the TTC public meeting of 4 August 2016 and at the Haddenham Parish Council meeting on 28 July 2016 that many people in Haddenham naturally gravitate towards Thame rather than Aylesbury.
- 6.11. The long talked of Thame / Haddenham cycle path still does not exist after more than 10 years of discussion – a prime example of desperately required infrastructure for existing need not being delivered.

7. Local need?

- 7.1. The VALP does not appear to make any provision for employment land to support a large new settlement, further exposing the fact that this would simply become a dormitory development for longer distance commuting.
- 7.2. If development is so clearly aimed at longer distance commuters then it does not reflect AVDC's housing need, nor even WDC's unmet housing need, but is simply London overspill.
- 7.3. To be fully sustainable, new housing must be provided for as close as possible to employment, and not for long distance commuters. There is no sustainable point in Thame / Haddenham being a commuter town for Oxford / London / High Wycombe.
- 7.4. Under the two sets of proposals it seems that Haddenham and Thame are destined, in time, to become virtually a single entity, sandwiched between the M40 and HS2, and serving commuter demand for housing. Thame is a historic market town with unique character and a strong community, and Haddenham is a peaceful rural village with its own identity, yet both could be sacrificed to the housing numbers game and without sufficient infrastructure provision to compensate. This would be against draft Policy S3 from the VALP itself, which states "...new development in the open countryside should be avoided, especially where it would: ...a. compromise the open character of the countryside between settlements, and b. result in a negative impact on the identities of neighbouring settlements or communities resulting in their coalescence". The importance of recognising the threat of settlements losing their character is further recognised in Policy S3: "In considering applications for building in the countryside the council will have regard to maintaining the individual identity of villages and avoiding extensions to built-up areas that might lead to coalescence". Using their own draft policy as a yardstick, the proposal at Haddenham is undoubtedly contrary to these key principles.

8. Transport

- 8.1. Because of Haddenham & Thame Parkway station and the convenient access to the M40, development in and around Haddenham will attract London commuters rather than local workers and, in that sense, does not solve WDC's unmet need.
- 8.2. The VALP also evidences Haddenham & Thame Parkway station and commuter transport links as part of its rationale for preferring Haddenham as the location for a new settlement, giving further transparency to the fact that the proposals do not meet WDC's unmet need.

- 8.3. The opportunities presented by the proposed east/west high speed railway line (and the extension of the Aylesbury spur to Winslow) should be taken, which would provide more sustainable locations for new settlements rather than adjacent to Haddenham.
- 8.4. AVDC proposals for a new settlement at Haddenham would impact on WDC's own proposals for Princes Risborough because of proximity. Both proposals would share the same rail line and much of the local highway network. Peoples' daily travel experience is that both the railway and many local and trunk roads, including the M40, are already operating at capacity. Meanwhile both South Oxfordshire and Cherwell District Councils have growth proposals impacting on those same networks. This fragmentation of authorities means that no-one is considering the combined impact on the transport infrastructure in this area.
- 8.5. Along the Chiltern Line / M40 corridor it seems that every planning authority is evidencing transport connections as justification for substantial growth. Cherwell DC are proposing 7,300 homes in Banbury and 10,000 in Bicester; SODC are proposing 600 in Thame in addition to the 1,000 already allocated plus recent windfalls; SODC's proposed settlement at Chalgrove / Harrington cites the accessibility of the M40 and Haddenham station; AVDC are proposing 5,500 homes at Haddenham; and Wycombe DC 2,600 at Princes Risborough and 5,250 at High Wycombe. Add in the fact that Chiltern Rail will shortly be running a service from Central Oxford to London.
- 8.6. The railway station at Haddenham is already extremely busy at rush hours and clearly unable to handle a probable doubling of passenger numbers without very substantial investment by Chiltern Rail. Parking at the station, despite increasing its capacity in recent years, is woefully inadequate and the overspill into residential streets has become a major issue for Haddenham Parish Council.
- 8.7. Many people's daily travel experience is that much of this network is already running at capacity, with standing room only on many rush hour services. Marylebone is a relatively small terminus with limited tracks and platforms so evidence should be sought from Chiltern Rail that it can cope with longer trains or more frequent services to meet the substantially increased demand from the cumulative effect of proposed development along the route.
- 8.8. Similarly, the extra pressure on M40 traffic will severely exacerbate a road network that is already frequently congested and subject to delays.

9. Local Roads

- 9.1. There are no specific proposals in the plan and nothing to indicate that the very severe impact of considerable extra road traffic from Haddenham expansion and a possible substantial new settlement has been taken into account.
- 9.2. Traffic from Haddenham to the motorway, and from Chalgrove / Harrington to Haddenham station, will all converge on the Thame ring road and, in particular, Thame's Aylesbury Road roundabout, as evidenced by AVDC's own consultants advising on the ability of the local highway network to accommodate growth. AVDC seem to be ignoring this advice, possibly because it will become Oxfordshire County Council's problem.

10. Summary

- 10.1. It seems apparent that each of the planning authorities (Cherwell, SODC, AVDC, WDC) is concentrating on its own plan in isolation, with little strategic cooperation and joined up thinking about the combined effect of proposals from the various authorities and the ability of communities and infrastructure to cope.
- 10.2. SODC and AVDC are either worryingly ignorant of each other's plans or are choosing to ignore cross-border issues around infrastructure. As an example, the VALP seems to be

over-relying on Thame's infrastructure even though there is currently a shortfall in key areas, including health, education and leisure, plus concerns with regards to the local road network.

- 10.3. The TNP allocated sufficient growth in housing, employment and community facilities to 2027. The planning and development of infrastructure now lags behind housing provision. The Thame community is extremely concerned over the impact of the VALP on Thame. The proposals for Haddenham do not recognise the inevitable impact and effect on Thame nor do they acknowledge the community's vision for Thame to remain a compact market town, best suited to serve the needs of Thame and the immediate surrounding area.
- 10.4. WDC are not allocating sufficient land within its own borders, as shown by the low densities proposed for housing land. With the information currently available TTC cannot even be sure that a new settlement is needed.

The new settlement proposed at Haddenham seems to be envisaged as a commuter town. No real mention is made of employment provision within the proposed town. This only encourages further long-distance commuting along the already stretched M40 and Chiltern rail corridors. The VALP fails to account for planned growth at Banbury, Bicester, Thame/Haddenham, Chalgrove/Harrington, Princes Risborough and High Wycombe; it totally fails to reflect the absolute necessity for new communities to be sustainable.

Yours sincerely

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