

Buckinghamshire Local Plan (Draft 2045) – Regulation 19 Consultation Response

Formal Objection on Grounds of Soundness: Request for a Strategic Supplementary Plan for the Winslow, Addington, Great Horwood, and Little Horwood Cluster

Dear Planning Policy Team,

Little Horwood Parish Council is submitting a formal representation regarding the publication version of the Buckinghamshire Local Plan. This representation focuses specifically on the strategic allocations, the New and Expanded Settlement (NESS) proposals, and the associated site allocations within the Winslow, Addington, Great Horwood, and Little Horwood cluster.

Having reviewed the draft plan against the statutory criteria set out in the National Planning Policy Framework (NPPF), Little Horwood Parish Council objects to the plan in its current form. **The plan is fundamentally Unsound because it is not Positively Prepared, Justified, or Effective. To remedy these deficiencies, the parish council will be arguing that the Winslow New Expanded Settlement is of such a size that it threatens to change the area dramatically and it must therefore have its own Supplementary Plan which should be required by the Local Plan.**

The Remedy for Unsoundness: The Need for a Strategic Supplementary Plan

The current draft plan attempts to manage a massive growth corridor using generic, high-level policies. Because this specific cluster sits on a highly sensitive rural borderland facing a simultaneous westward squeeze from Milton Keynes City Council's Local Plan, a standard allocation framework is entirely inadequate.

To make this plan **Sound**, the Council must contain these pressures within a legally binding **Supplementary Plan (such as a Strategic Allocation Masterplan Document)**. This Supplementary Plan must be explicitly written into the text of the main Local Plan to guarantee the following protections:

1. **A Cross-Boundary Infrastructure and Transport Masterplan:** The Supplementary Plan must legally bind Buckinghamshire Council and Milton Keynes City Council to a joint infrastructure framework. This must include mandatory developer funding (Section 106/CIL) pools specifically ring-fenced to upgrade shared border bottlenecks—such as the A421 / B4033

roundabout—and to establish dedicated, non-car transit corridors connecting the Horwoods and Addington to the new Winslow East West Rail (EWR) station.

2. **Strict Coalescence Protection and Mandatory Green Buffers:** Rather than relying on vague landscape protections, the Supplementary Plan must map out fixed, non-negotiable "Strategic Green Buffers" between Winslow, Great Horwood, and Little Horwood. This is required to prevent the physical merging of these historic settlements and to preserve their distinct identities in line with the NPPF.
3. **An "Infrastructure-First" Delivery Timeline:** the plan is unsound because it does not demonstrate that the Winslow NESS is capable of being supported by the necessary infrastructure, which it is required to do.

The Supplementary Plan must therefore feature a strict Phasing and Delivery Schedule. This schedule must mandate that primary healthcare expansions, secondary school places, and sports/leisure facilities are fully operational *before or alongside* the completion of early residential phases, blocking developers from exploiting loopholes through phased, piecemeal applications.

Core Deficiencies Under the Tests of Soundness

Without the containment and protection of a dedicated Supplementary Plan, the current Local Plan draft fails the statutory tests in the following ways:

- **NOT POSITIVELY PREPARED:** The plan proposes a population explosion for the Winslow nucleus, scaling up from roughly 5,000 to an estimated 36,000 residents via a massive 9,000-home footprint. However, it fails to provide a frontloaded infrastructure strategy, leaving local primary healthcare, secondary education, and sports/youth provisions facing a severe, unmitigated deficit.
- **NOT JUSTIFIED: Deficiencies in Spatial Density and Character Compatibility**
The Council's allocation strategy for Winslow proposes a hyper-dense development model reaching up to **79 dwellings per hectare (dph)**. This extreme density metric is entirely unsupported by proportionate evidence and fails the test of being justified:
 - **Erosion of Townscape:** A density of 79 dph is fundamentally incompatible with the existing historic market townscape of Winslow and the surrounding rural villages, which are characterized by organic, low-to-medium density layouts and open green views.

- **Buckinghamshire Design Code Conflict:** This proposal directly contradicts the core principles of the Council's own **Buckinghamshire Design Code**. The code mandates that new developments must respect local character, build out appropriate transitions to the countryside, and mirror regional architectural heritage. Forcing urban-level, high-density configurations into a rural-edge settlement cannot be achieved under these adopted design standards without completely abandoning the code's statutory guidelines.
 - **NOT EFFECTIVE:** The plan operates in a cross-boundary vacuum. It fails to coordinate effectively with Milton Keynes' growth, creating a "pincer effect" that traps rural villages in a high-density commuter corridor without joint highway mitigation. Furthermore, it leaves the area vulnerable to speculative, piecemeal developer applications that bypass infrastructure funding thresholds.
 - **INCONSISTENT WITH NATIONAL POLICY:** By encouraging urban sprawl and the physical merging of distinct rural settlements, the plan directly violates **NPPF Paragraph 134** (safeguarding the countryside from encroachment). It also undermines the statutory weight of community-led planning by allowing strategic allocations to override adopted Neighbourhood Plans.
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Request for Full Participation in the Examination in Public (EiP) Hearings

Pursuant to the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012, **Little Horwood Parish Council hereby formally request the right to attend and participate orally at the independent Examination in Public (EiP) hearing sessions.**

Direct participation at the Planning Hearing is necessary to explain why a generic policy approach cannot work for this borderland, to present technical objections regarding the unachievable 79 dph density proposals, and to demonstrate why a dedicated Supplementary Plan is the only viable mechanism to make the Buckinghamshire Local Plan sound.

Little Horwood Parish Council looks forward to receiving confirmation of this representation and notification regarding the hearing schedules.

Yours sincerely,