

Response by Drayton Parslow Parish Council to the Buckinghamshire Draft Local Plan (Regulation 19 consultation)

General comments on the draft plan:

The draft plan is very vague regarding the provision of many of the key pillars of sustainable development such as transport and infrastructure. Any comments that are in the plan are very broad brush and don't suggest how these issues could be addressed. There is a significant risk that leaving such elements to the planning application process for individual sites could lead to strategic sites failing at the planning application stage and adversely affecting the 5 year housing supply as a result.

There is a general lack of detail regarding the assessment criteria used in the selection of proposed developments following the call for sites. This is both in terms of an overarching framework for the evaluation of proposed developments within settlements of different sizes, and the tables listing the various proposed sites. There is, in fact, little evidence of this work in the selection of sites beyond following the simple instruction from government to include all sites that had prior applications rejected or withdrawn.

General comments regarding proposed sites that affect the parish of Drayton Parslow

There are many things missing from the assessment of the sites allocated for development in Drayton Parslow that we would expect to be there, or at least they haven't been addressed as fully as we would have expected.

In particular with regard to sustainability. Allocating what for our village is a significant level of housing development in a village which has no shops, health facilities, very limited employment opportunities and a school which is pretty much at capacity (with little scope for further development on the school site) and very poor public transport links, is hardly sustainable development.

At least two out of the three proposed sites (Opus references 145 and 274) would require a significant investment in drainage and sewerage infrastructure as backups and overflows are a common problem with the current level of housing, yet the draft plan is silent on these issues.

Detailed comments on proposed sites in and around the parish of Drayton Parslow

“Suitable sites”

Opus reference 145 Land off Salden Close,

Opus reference 274 Land South of New Road

Opus reference 3132 Land to the north of North Close

Opus reference 4078 Oaktree stables Drayton road Newton Longville

“Unsuitable sites”

Opus ref 295 Land and Buildings at 49 Main Road, Drayton Parslow, Milton Keynes

Parish Council comments on “suitable” sites

All three proposed sites are outside the settlement boundary of the made Neighbourhood Plan and therefore are at odds with the plan’s policy DP6.

Opus reference 145 Land off Salden Close,

This site has several refusals for planning, including on appeal:

19/01145/AOP | Outline application for the erection of 5 dwellings. | Land East Of Salden Close Drayton Parslow Buckinghamshire MK17 0JY – Refused 10 July 2020, appeal dismissed 13 May 2021

98/02506/AOP | Site for 5 dwellings | Land Off Salden Close Drayton Parslow Buckinghamshire
Refused 1 Jan 1998

98/02505/AOP | Site for 3 dwellings | Land Off Salden Close Drayton Parslow Buckinghamshire
Refused 4 Feb 1999

Appeal to **19/01145/AOP** comment from the inspector:

The appeal site is located on the edge of this eastern part of the CA (Conservation Area). It is therefore within its setting.

There has been some unsympathetic and suburban development within the village, including a large area of residential development off Bates Gardens and New Road. Nevertheless, the overarching character of a linear, historic village characterised by a number of quality historic buildings within a rural and landscape setting prevails within the eastern part of the CA. The arrangement of pastoral fields behind the development along Main Road helps to reinforce the linear character of the CA.

Opus reference 3132 Land to the north of North Close

The site has one refusal including on appeal.

18/00083/REF | Residential development of 24 dwellings with parking, garaging, landscaping and associated works | Land Off North Close Drayton Parslow Buckinghamshire .

Refused 28 March 2018, Appeal Dismissed 29 March 2019

Comment on the above appeal from the inspector:

The distinctly urban appearance of the scheme would contrast markedly with the edge of the countryside setting. The site is currently free from permanent development and performs a transitional role between the existing built development and countryside beyond. The proposal would not complete the well-defined settlement pattern but would instead be an intrusion into the countryside to the detriment of the rural landscape

Opus reference 274 Land South of New Road

Whilst there is no historical planning permission for this piece of land the council would point out that this is, like the other sites, on the edge of the Conservation Area and backs on to fields and the open countryside and therefore unsuitable in the same way as the other two.

We would note that a previous application for housing at the north end of Chapel lane which this site would join to Kingsland farm was approved on appeal in part because the inspector incorrectly gave sustainability weight to a school bus service as if it were a public transport link to Aylesbury.

Opus reference 4078 Oaktree stables Drayton road Newton Longville

There is limited guidance within the Planning Policy for Traveller Sites (PPTS) 2024 on the criteria for judging potential traveller sites, concerned more with the instruction to calculate and provide the relevant number and layout of pitches. PPTS does state policy aims that include:

To enable provision of suitable accommodation from which travellers can access education, health, welfare, and employment infrastructure.

For local planning authorities to have due regard to the protection of local amenity and local environment.

There is no wording in the Buckinghamshire Spatial Strategy document that goes beyond the PPTS.

Currently, therefore the Aylesbury Vale Local Plan 2021-33 is the policy document that is relevant for consideration.

Policy D11 sets out the considerations for the identification of traveller sites. Among the criteria set out in the policy are that it should:

- *have good access to facilities such as shops, healthcare and public transport;*
- *have a safe vehicular access;*
- *it should have visual privacy;*
- *it should not have a detrimental environmental impact.*

The Plan also says in the preamble that traveller sites should demonstrate a local need and that there are no alternative sites in the area. The Milton Keynes Local Plan identifies the site at Newton Leys, which is very close to the proposed site and its capacity should be a material factor in considering pitch numbers in proximity to Milton Keynes as opposed to elsewhere in the county.

The Parish Council contends that the site in question does not meet the first criteria as there is no footpath connecting the site to Newton Longville, and residents would have to walk along the road or use a vehicle to get there.

In terms of the vehicular access, note that access is onto a road which has the national speed limit and for planning purposes one would normally try to avoid a number of access points close together and on opposite sides of the road, as is the case for this site with the shared WJ Goup and Hoist Mech Ltd. depot opposite with the continual movement of large vehicles.

In terms of the last two criteria, the site is visually prominent as you approach from the south, with clear views into the site, affording little privacy for the residents and having a detrimental visual impact upon the appearance of the area.

For these reasons we do not believe that the site is suitable.

Parish Council comments on “unsuitable” sites

the council comments on one site:

Opus ref 295 Land and Buildings at 49 Main Road, Drayton Parslow, Milton Keynes

This is the site of Denne engineering, a family firm with a long-term history with the village. The site as submitted includes a brownfield site for their depot and the agricultural fields behind.

The submission to the HELAA is for the entire site. If this site were to be split into two parts, brownfield and open fields, then the brownfield portion could be considered for housing and would be supported following the Drayton Parslow made Neighbourhood Plan policy DP1. Although the desktop exercise indicated it as an existing employment site, the Denne’ family have indicated to the Parish Council their intention to relocate from the site to other locations, freeing the brownfield land for development.

Further comments

Despite currently having little weight, the draft NPPF published by the government in 2025 may indicate in *S4 Principle of development within settlements* that our village may be required to take additional housing, however draft policy S6 states:

“the benefits of approving a development are likely to be substantially outweighed by the adverse effects where a proposal would conflict with a neighbourhood plan, provided the following apply:

- a) The neighbourhood plan became part of the development plan five years or less before the date on which the decision is made and*
- b) The neighbourhood plan contains allocation to meet its identified housing requirement (see policy HO2)”*

The current spatial strategy of Buckinghamshire Council refers in Approach 6 to the “limited expansion of villages” and makes specific reference to “sustainable rural villages”. Put together with the comments from planning inspectors both working for Buckinghamshire Council and those appointed by the Secretary of State on appeal for the two sites that have had planning permission refused we would submit that Drayton Parslow is not a sustainable rural village due to:

- a) its small size, lack of facilities and public transport and;
- b) the harm caused by developments on the edges of a conservation area and their effect on the views into the village from the surrounding countryside and from the existing conservation areas out of the village .

Therefore we argue that it follows that the “suitable sites” identified within Drayton Parslow should not be included in the emerging Buckinghamshire plan.