Buckinghamshire County Council
County Hall, Walton Street
Aylesbury, Buckinghamshire HP20 1UA

Dear Sir/Madam

South Northamptonshire, Local Plan Part 2- the Regulation 19 Consultation

Thank you for consulting Buckinghamshire County Council (BCC). BCC welcomes the opportunity to comment on Local Plan Part 2 the Regulation 19 Consultation document.

Buckinghamshire County Council (BCC) has a statutory role for strategic planning as the County Highways Authority, County Transport Authority, County Flood Authority, County Education Authority and County Minerals and Waste Planning Authority. It also has an obligation for joint working with District Councils within Buckinghamshire on their Local Plans. The County Council also fulfils other functions which advise on planning proposals such as the County Archaeology service which maintains the local Historic Environment Record, the County Ecology Service which has responsibility for monitoring and protecting the natural environment including the maintenance of the Bucks and Milton Keynes Environmental Records Centre and ecological resource of the County and the Public Rights of Way service which has responsibility for the managing and maintaining the County’s Definitive Map.

BCC as a statutory Authority has an influencing role over County wide strategic planning matters with its District and neighbouring authorities as part of the duty to cooperate (Localism Act 2011) and a public health obligation to safeguard social, economic and environmental wellbeing of the County; it is in this context that I have set out the comments of the County Council in the attached appendix. Our comments mainly relate to transport, education and strategic flood management.

Thank you again for the opportunity to comment on the South Northamptonshire Local Plan. If you have any further queries arising from our comments or would like to meet to discuss cross boundary matters emerging from the plan, please contact the BCC
Strategic Planning team via the following email address:
strat_planning@buckscc.gov.uk.

Yours faithfully

Ismail Mohammed
Strategic Planning and Infrastructure Manager
APPENDIX

Transport

BCC’s Transport Strategy team is keen to work with you to ensure our plans work together, to meet the needs of our respective communities and businesses.

BCC adopted its fourth Local Transport Plan in April 2016; It sets out our high level strategy for transport and should provide you with a clear understanding of our transport objectives and policies. If there is any data used in our Plan which is of interest to you, please do not hesitate to contact us.

BCC continues to support the commitment to modal shift to active and public travel and, the promotion of electric and low emission vehicles outlined in the Plan. This is in line with our Local Transport Plan 4 policies to reduce air and noise pollution and increase sustainable travel.

Overarching issues

The County Council requests that South Northamptonshire monitor and mitigate where possible any adverse consequences arising as a result of growth at Brackley. Some commuting trips from Brackley may use the A421 to travel to Milton Keynes, and will increase pressure on an already congested route. BCC’s Buckingham Transport Strategy aims to deal with transport issues in Buckingham and the surrounding area, including schemes to improve the A421 and A413 through dualling. This also includes plans aimed at improving public transport connections to Silverstone and a number of cycle routes, including intra urban routes to Stony Stratford and Silverstone.

One of the challenges we share is a high level of cross-border travel, combined with high levels of car use. We would encourage you to highlight the significant level of cross-border travel that South Northants has with Buckinghamshire and other authorities.

What the plan should consider

BCC at pre-submission stage commented on the need to reference upcoming projects including HS2, East West Rail, Oxford to Cambridge Expressway. The draft Local Plan Part 2 provides some reference HS2 and to those in policy EMP3 and supporting text National Infrastructure Commission’s Oxford-MK-Cambridge growth corridor and the proposals for strategic rail freight interchanges (SRFIs) on the edge of Northampton which is welcomed by BCC. While we appreciate that the Plan now makes reference to the Oxford to Cambridge growth corridor, we would encourage you to further highlight significant infrastructure projects in the region such as East West Rail and the Oxford to Cambridge expressway. These projects will play a significant role in shaping the future national transport network in the region.

Freight and the impact of HGVs in rural areas using inappropriate roads is an issue in Buckinghamshire and which is likely to be similar in Northamptonshire. In addition, both counties are likely to experience HGV vehicles seeking to find the quickest route and to avoid congestion on the strategic network. This leads to HGVs using the local road
networks across both counties. There is a need for joined up work across both counties to address this issue. Perhaps most relevant to South Northamptonshire are concerns about HS2 construction traffic and the impact on villages as a result of HGVs avoiding congestion on the A421 whilst transiting between the M40 and M1. BCC is therefore supportive of Policy Employment 2: “Development proposals that result in an increase in HGVs on C and U class roads, or a significant increase in other traffic on C and U class roads will generally not be permitted.” We look forward to working with you as your Plan develops.

Education

During the recent duty to co-operate meeting South Northamptonshire officers stated that the pupil projections and cross border pupil movements updated are not required to be updated for the Local Plan 2, these will be revisited in line with Local Plan 1 review.

Strategic Flood Management

The Local Plan Part 2 does not contain any specific policies relating to flood management or sustainable drainage. During the recent duty to co-operate meeting the South Northamptonshire officers confirmed that these will be reviewed in line with the Local Plan 1 review and the policies contained in the Core strategy currently apply. BCC welcomes consideration of flood risk in Policy SS2 and LH11.