



Local Plan for Buckinghamshire - Draft Local Plan (Regulation 19)

Representation from Cuddington Parish Council on Draft Local Plan for Buckinghamshire (Regulation 19).

Chapter 5 – Spatial Strategy and strategic policies

Spatial Strategy for Housing and Economic Growth

Housing Need and Housing Land Provision and Distribution

Cuddington Parish Council consider that the suggestion that the village should accommodate 32 affordable homes is not sound or justified.

The Housing Needs Assessment Annex A for affordable homes in settlements under 3000 is arbitrary and unsubstantiated.

For affordable housing, Bucks Local Need Housing Assessment (LNHA) report includes Cuddington under the heading of 'Parishes with populations under 3000'. It recommends that Cuddington accepts 32 'affordable homes' on an arbitrary pro-rata basis of 3 affordable homes per 1,000 residents annually.

Point 1. Annex A of the LNHA should be removed. The approach to affordable housing should be based on local circumstances and the proposed Management Policy related to allocations and not an arbitrary pro-rata distribution based on population.

Policy SP2: Housing strategy

Cuddington Parish Council considers that the housing strategy for small greenfield sites in villages is not sound for the following reasons:

The overall housing strategy for Cuddington as a small /medium village is unjustified.

The strategy is the least sustainable option and didn't include any Grey Belt sites.

Bucks' strategy includes a number of allocations in small/medium villages under Policy **SMA001: Small site allocations for residential and residential-led mixed use development.**

Housing allocations in small/medium village are often the least sustainable option. NPPF para 77 extols the virtue of focusing on larger sites that can support new and improved infrastructure, including the choice of transport modes:

“The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport mode)”

The Bucks Sustainability Appraisal Interim Report (August 2025) makes the same point and suggests that village expansion is the least sustainable option:

Sustainability appraisal conclusions

Other settlements (i.e. villages)

6.3.97. Higher growth at villages does naturally give rise to a concern regarding ability to access higher order services and facilities and reliance on the private car to do so. Whilst the ongoing national switch-over to electric vehicles does reduce concerns, there remains a need to minimise traffic in congestion hotspots and also along rural roads with limited capacity and through historic village centres.

6.3.99 Finally, the Transport Baseline Study (2024) does not support this scenario, stating: “This scenario can be viewed as... spreading the load which avoids overloading one settlement / one part of the network. But fundamentally... **this scenario is the least favoured** as it will perpetuate car-based developments and will not promote the behavioural change necessary to reduce our carbon emissions issues thus contributing to climate change. This goes against the LTP5 ambition...”

Point 1. Sustainability - Transport modes are critical to site selection

Both the NPPF and The Bucks Sustainability Appraisal highlight the importance of transport choice to reduce the dependence on car travel. Cuddington has a very limited bus route both in terms of timetable and destinations. The main access to a regular bus service to Haddenham, Aylesbury and Oxford is on the A418 at Kings Cross junction with Churchway.

The Cuddington Neighbourhood Plan identifies safe access to the bus stops at Kings Cross as a priority. The current pedestrian and cycle access is unsafe because of the speed limit (60mph), lack of a safe verge and poor sightlines.

Approaches to Bucks Highways by Cuddington PC have proved unfruitful. Similarly, discussions to deliver a safe verge along Dadbrook with the landowner have not been successful and permission has been refused.

Please note that the landowner of the Dadbrook verge is the landowner of the proposed Dadbrook Farm allocation Ref 216. In addition to the verge, the adjacent field is also owned by the landowner which could facilitate a much safer pedestrian/cycle access towards the facilities and transport links of Haddenham. Also there is currently no footway to the proposed access point of the development from the village centre.

Any additional housing in Cuddington should be conditional on improvements to this infrastructure. It also requires the road junction on the A418 to be improved to allow pedestrians to cross safely – see Point 7.

It is understood that this junction will be redesigned as part of the Haddenham NESS proposals.

Point 2. Sustainability – damaged land should be developed before greenfield.

Virtually all the housing sites selected at villages are on undeveloped greenfield land. No Grey Belt site has been selected for allocation in the Bucks Draft Local Plan, despite offering a capacity of 4500 dwellings.

Grey Belt sites are defined as ‘damaged’, and many will be more sustainable than greenfield sites. The option to allocate sustainable poor quality Grey Belt sites ahead of greenfield sites has not been assessed in the Draft Local Plan.

Given that the starting position for the Local Plan is a continuing lack of a 5-year housing supply this should have been a legitimate option and would have avoided taking excessive areas of undeveloped agricultural land.

Chapter 6 – Site Allocations

Small Sites Policy

Policy SMA001: Small site allocations for residential and residential-led mixed use development.

Cuddington Parish Council consider that the allocation of up to 70 homes on the Dadbrook Farm site Ref 216 has not been shown to be sound or justified for the following reasons:

1. The site assessment for Cuddington Dadbrook Farm in the Draft Local Plan is inadequate and lacks transparency.

The proposed Cuddington housing site at Dadbrook Farm (Ref 216) is approx. 3 ha (1.5 ha greenfield and 1.5ha 'brownfield'). It has been allocated for a capacity of 70 at a density of 30 houses per hectare.

Bucks HELAA sets out a process to examine candidate sites, but the results are only summarised in the Evidence for the Draft Local Plan. For Cuddington the site assessment conclusion is *"The majority of the site is a previous allocation, and the remaining part of the site is considered brownfield. Development of the site would fit in with the existing settlement pattern and form a natural extension"*

The 'previous allocation' in VALP is a replaced policy that never delivered any housing.

There is no information about infrastructure capacity, deliverability etc within the Bucks published site assessment

The relevant Draft Local Plan policy is **SMA001: Small site allocations for residential and residential-led mixed use development.**

a) The sites listed in Appendix K and shown on the Policies Map, are allocated for residential or residential-led mixed use development and associated uses. They will be developed in accordance with the relevant Local Plan policies and any key development requirements are listed within Appendix K for each site.

Appendix K aims to provide development criteria for each site *"to ensure the likely impacts of the development will be adequately mitigated"*.

There is no input for Cuddington 216 in Appendix K

Point 1. There is inadequate information in the Draft Local Plan to support the proposed allocation at Dadbrook farm, and no key development requirements are identified.

2. The deliverability of the Cuddington Dadbrook Farm site is not adequately assessed in the Draft Local Plan.

The commentary for draft Policy **SMA001: Small site allocations for residential and residential-led mixed use development** states:

Para 6.491 *"... a mix of sites is required and the NPPF sets out that small and medium sized sites can make an important contribution to meeting the housing*

requirement of an area. They can often come forward quicker and provide more options on the market”.

Para 6.493 explains how the allocated sites will be brought forward.
“The identified development requirements for each of the housing sites are necessary to ensure the likely impacts of the development will be adequately mitigated. Further requirements may be needed when a planning application is under consideration. These will be necessary to make a particular development acceptable in planning terms”.

Para 6.494 refers to Appendix K *“The tables in Appendix K set out which settlements fall within each tier as identified through the Settlement Hierarchy Assessment. The allocated sites have been set out by tier in the tables. Key requirements for each site where necessary have also been set out”.*

Point 2. The timeline of deliverability for Dadbrook Farm is questionable.

The assumption that smaller sites can come forward more quickly is simplistic.

The Parish Council advised the VALP Examination that the Dadbrook Farm allocation was not deliverable and this has proved correct as no planning application has been submitted. This allocation will disappear once the VALP policies are replaced by the Bucks Local Plan

In the case of Bucks Draft Local Plan allocation for Dadbrook farm the entire farm operation needs to be relocated to enable development to take place. There are no details of how this will be organised or funded, or any anticipated timeline. There is the risk that it may never happen. The deliverability of the site within the timeframe of the Local Plan is by no means certain

Point 3. There is no evidence that the infrastructure constraints on the deliverability of Dadbrook Farm have been considered in the Draft Local Plan.

Policy SMA001 states that:

b) All sites will need to make appropriate financial contribution to any necessary infrastructure requirements, including towards additional capacity in local schools and health facilities.

For Dadbrook Farm to be deliverable the development would need to fund the relocation of the farm enterprise and provide financial contributions to local infrastructure (Education and Health). The local Primary school at Cuddington has limited capacity and a lack of space to accommodate any additional classrooms etc. even if additional funds were provided by the developer. A significant increase in housing in Cuddington would necessitate children going to schools in Haddenham where spaces at Primary Schools will be under intense pressure from NESS allocations until additional schools are built, probably very late in the Plan period.

Local health facilities are in Haddenham. Even with additional finance the problem is that there inadequate and safe pedestrian and cycle routes to access the health centre from Cuddington – see Point 7.

The Cuddington sewage works would also have to be upgraded and funded by the developer.

There is no evidence that the necessary infrastructure would be completed within the plan period or that the development could support the additional costs. These issues should have been considered in the HELAA assessment

3. The capacity of the Cuddington Dadbrook Farm site has not been adequately assessed.

Cuddington PC accepts that villages should accommodate some limited housing growth provided it does not adversely affect the social and physical structure of the village or undermine their unique character. This vision is set out in the neighbourhood Plan for Cuddington.

In the last few years there have been 7 houses delivered through the VALP allocation, 3 permitted development homes and 8 homes through infill; a total of 15 homes.

Cuddington benefits from a range of community services that serve the residents and adjoining settlements. The settlement is small and compact in shape and sits well in its landscape. It has a small population of around 590 people and 255 homes (including 32 affordable homes).

Additional housing is not needed to support community facilities

The existing community facilities are stable and have been in place for many years. They are supported by local volunteers and the Parish Council. Planning policies often suggest that additional housing/residents can keep rural facilities viable and/or encourage new facilities.

This is not the case at Cuddington; significantly more housing would not lead to better facilities and would put existing facilities under unnecessary strain. The smaller brownfield element would be sufficient to meet local housing needs and support businesses in the village

Point 4. An increase of 70 new homes at Cuddington is disproportionate

An additional 70 homes is equivalent to 175 people @average 2.5 / household. This would represent a growth in homes of 27% and growth in population of 30%. There is no evidence through HELAA or any other report that the village can accommodate this level of growth within the existing infrastructure capacity and transport modes (see Point 1), Nor is there evidence that the necessary infrastructure improvements can be delivered – see Points 4 and 5 above.

If it is concluded at Examination that the Dadbrook Farm site is deliverable, then the Cuddington PC would like to see the allocation restricted to the brownfield element and Appendix K completed with key development requirements for Cuddington.

The brownfield element of the Dadbrook Farm site could deliver up to 35 homes bringing the total for Cuddington, since 2020 to 50 homes. This option would avoid taking greenfield land and reduces the infrastructure requirements and traffic generation related to the allocation.

Point 5. The key development requirements should be defined

The following requirements should be added to Appendix K for Cuddington Dadbrook Farm site:

- a) Provision should be made for safe pedestrian access from the site to the bus stops at Kings Cross. (The necessary improvements to the Kings Cross junction also need to be considered but are assumed to be part of Haddenham NESS proposals)
- b) The speed limit on Dadbrook should be reduced to 30mph to take account of the increase in traffic entering and leaving the site and pedestrian safety between Dadbrook Farm and the A418
- c) Landscape buffers should be provided between the development and the boundary with the countryside
- d) There should be an adequate landscape buffer to the Dadbrook to avoid pollution during construction and occupancy.
- e) Highway access needs to take into account the narrow width of Dadbrook and poor geometry. The impact of construction traffic should be addressed
- f) The development should take into account the policies and objectives of the Cuddington Neighbourhood Plan.

Chapter 7 - Development Management Policies

Policy TR1 - Transport requirements for new developments

Policy TR2 - Transport improvements

Buckinghamshire Council has established the Waddesdon Area Freight Zone to control the increasing numbers of HGVs passing through the centre of local villages including Waddesdon, Chearsley, Long Crendon, Ashendon, Cuddington, and Stone.

This management of the Zone is progressing slowly with support from Bucks and the local communities.

The Local Plan for Buckinghamshire; Strategic Transport Assessment, July 2026 explains the problem:

“Key issues of the transport network

3.15 As part of the Baseline Transport Study pre-existing constraints and issues with the highway network within Buckinghamshire were identified. These include:

- a. Existing congestion in Aylesbury, High Wycombe, Amersham and Chesham.*
- b. Existing junction capacity issues on the A41 Aylesbury, A418 Aylesbury, A40 High Wycombe and A416 Chesham.*
- c. Growth forecast to place additional pressure on strategic junctions such as the M40 J4 and A404 and key corridors such as A418, A41 and A413.*

3.16 The transport modelling work provided further information about future issues. Full details can be found in the Transport Modelling and Mitigation Report.

3.17 The transport modelling work first compared the 2045 DS1 scenario with the 2045 Do minimum (DM) scenario to understand the impact of Local Plan development with no mitigation. The same comparison was then conducted for the 2045 DS3 scenario and 2045 DM scenario.

This work identified potential key issues for the transport network in the future:

- a. The proposed development as part of the Local Plan comes on top of what is already, at some times and in some places, a congested network.*
- b. Local Plan development will significantly increase trips across the highway network — particularly in northern Buckinghamshire.*
- c. Trip patterns for DS1/DS3 against the DM show patterns of routing and increased traffic flows all over Buckinghamshire which are not just limited to the major road network. Indirect and undesirable trip routes, such as small rural lanes, are being chosen over main routes for some journeys, in order to avoid congestion.*
- d. Key areas of impact identified in DS1 were A421 (between Bottledump Roundabout and Coddimoor Lane), Buckingham (central and southern fringe), Winslow, Calvert and the Claydons, Wing, Cheddington, Aylesbury (north, southwest and south), High Wycombe (northeast fringe) and the Chalfonts.*
- e. Additional key areas of impact identified in DS3, that experienced significant change from DS1/DS2, were Winslow, Cheddington/Horton, Westcott Venture Park, Aylesbury (north and south).*

The proposed major developments at Wescott and Haddenham, together with smaller development at local villages will significantly increase the volume of large vans and HGVs

particularly at the construction stage. This needs to be looked at cumulatively for the whole of the freight zone rather than assume that the problem can be accommodated within the wider network

The only form of mitigation that exists at present is the Buckinghamshire Freight Road Map, but this is only advisory and largely ignored.

Buckinghamshire Council should be required to produce a comprehensive, cumulative site traffic management plan for construction and operational traffic within the Waddesdon Freight Zone. This is the area between the A41 and A418 from Haddenham and Waddesdon (south/ north) and Long Crendon/Stone (West/East).

The plan should include a full mitigation package including physical measures and also traffic control, management and enforcement measures.

Employment and Residential developments within and adjacent to the Zone should be required to sign up to the strategy as a key development requirement (Local Plan Appendix K) and contribute funding to support its implementation.

Buckinghamshire Council should monitor the effectiveness of the mitigation measures and update the strategy on a regular basis.