

6 COUNTER PROPOSALS : AYLESBURY

6.1 Introduction

- 6.1.1 In this section of my report I consider Counter Proposals relating to sites within or immediately adjacent to Aylesbury.
- 6.1.2 I have considered each Counter Proposal on its merits and in the context of my conclusions and recommendations concerning the amount and location of development proposed. I have also sought to ensure that my comments can be read without the need for frequent cross-referencing to earlier text. As a result it is inevitable that I repeat my summary of conclusions concerning these issues when dealing with the majority of the following objections.

6.2 Broughton Stocklake Extension

Objector

DD8006* Crest Strategic Projects Ltd
* recorded as an objection to policy AY.17.

Principal Issue:

- 6.2.1 Whether the proposed Broughton Stocklake MDA should be extended to accommodate some 2500 dwellings.

Inspector's Considerations and Conclusions:

Introduction

- 6.2.2 I have earlier considered a wide range of objections to the proposed Broughton Stocklake MDA, policy AY.17. However, prospective developers of the site, while supporting the MDA in principle, object on grounds that the amount of development should be increased. This objection was recorded as an objection to policy AY.17. However, in common with objections by other prospective developers suggesting that the Berryfields and Weedon Hill MDAs should be extended (CP021 and CP127 respectively), I deal with this objection as a Counter Proposal.
- 6.2.3 The objector suggests that the proposed MDA should be extended from 95ha to 182ha, of which some 67ha should be developed for housing, and that the number of dwellings be increased from 1600 to 2500. It is further suggested that the Plan should be reformed to provide two mixed-use MDAs, one to the north-east of the town (Broughton Stocklake), the other to the north-west (Berryfields), linked via the town centre by means of a high quality public transport corridor. It is maintained that this 'balanced' development strategy would obviate the need for the Weedon Hill and Aston Clinton Road MDAs, which should be deleted.
- 6.2.4 I have earlier dealt with submissions concerning the General Location of Development strategy, the AVDLP Housing Requirement, and the Aylesbury Development Strategy. I have also considered detailed submissions relating to identified brownfield sites in Aylesbury and the proposed mixed use MDAs.

- 6.2.5 Further to my consideration of submissions regarding the General Location of Development, I have recommended that 65% of housing and employment development proposed during the Plan period be located in Aylesbury, with provision for the remaining 35% in the Rural Areas (policy ST.1 as recommended to be modified). My consideration of submissions concerning the AVDLP Housing Requirement has enabled me to identify the need for some 4500 dwellings during the period 2001-2011, of which some 3550 need to be provided in the Aylesbury urban area, with the remaining 950 in the Rural Areas (Table 2 as recommended to be modified).
- 6.2.6 My consideration of submissions regarding the Aylesbury Development Strategy has led me to conclude that of the 3550 dwellings required during the Plan period, some 850 will be provided on brownfield sites, with the remaining 2700 being built on allocated greenfield sites. And finally, my consideration of detailed submissions concerning the three mixed use MDAs has led me to conclude that the Berryfields and Weedon Hill MDAs are acceptable, but that the Broughton Stocklake MDA should be deleted. Specifically I have concluded that some 1850 (out of a planned total of 3000) dwellings will be built at Berryfields, with a further 850 at Weedon Hill (Table 3 as recommended to be modified).
- 6.2.7 Accordingly I am satisfied that Aylesbury's housing requirements for the period to 2011 can be met on identified brownfield and allocated greenfield sites. It thus follows that there is no need for me to recommend the allocation of any additional or alternative land for housing development. And hence, no matter how suitable this or any other Counter Proposal site may appear to be for development, it may be argued that that level of suitability would not be sufficient to override the fact that I have already identified sufficient land on suitable sites in Aylesbury to meet the requirements of the Plan.
- 6.2.8 It is against the above background that I have considered this objection. Specifically, whether development of the enlarged site can be supported on its own merits, and if so, whether the benefits of the suggested 'balanced' strategy would outweigh my acknowledged acceptability of the Weedon Hill and Aston Clinton Road MDAs.
- 6.2.9 Of the 3550 dwellings to be provided in Aylesbury by 2011, some 850 will be built on brownfield sites and a further 1850 at Berryfields, producing a residual requirement of 850 dwellings to be provided elsewhere. This is significantly less than the 2500 proposed by the objector at Broughton Stocklake. I have earlier recognised that the Berryfields MDA will not be completed during the Plan period, with some 1150 dwellings being carried forward into the period post 2011. Thus, if the total number of dwellings built at an enlarged Broughton Stocklake was initially limited to 850, or the total number of completions at Berryfields and Broughton Stocklake adjusted to ensure that no more than the requisite 3550 dwellings were completed by 2011, allocation of an extended Broughton Stocklake MDA would result in a further 1650 dwellings being carried forward into the next Plan period; a total of 2800 dwellings overall. While not necessarily unacceptable if required to achieve a desirable long-term planning objective, this amount of over-provision would clearly prejudice the future Plan making / review process. Furthermore, it would be predicated on the deletion of the Weedon Hill MDA which presently forms an integral part of the Plan's strategy for housing provision. Given that I have already concluded that an alternative means of achieving the requisite housing numbers is acceptable in principle, with a reduced amount of carryover, I am reluctant to promote an alternative that may prejudice a future review of the Plan, and for which there is presently no proven over-riding planning need.

Issues

6.2.10 I earlier recommended that the Broughton Stocklake MDA be deleted, primarily on grounds of viability, drainage and flooding, visual intrusion and ecological impact. It is thus necessary for me to review these issues in order to ascertain whether increasing the scale of development proposed would remove these primary objections to development at Broughton Stocklake. For completeness I also briefly review other relevant issues appertaining to the development of the site, prior to assessing the merits of the suggested 'balanced' strategy.

(a) Viability

6.2.11 I earlier expressed my view that the viability of the Broughton Stocklake MDA is far from certain, and highlighted a number of variables and inconsistencies that exacerbated my concerns. No substantive evidence has been submitted concerning the viability of the larger proposals. However, notwithstanding the need for additional infrastructure, social and commercial facilities, and enhanced off-site mitigation measures, it is reasonable to suppose that the economies of scale will move the proposed scheme into viability. In the absence of evidence – or real concern - to the contrary, I must therefore conclude that the enlarged MDA would be viable, and as such would be able to deliver the range of facilities and infrastructure necessitated by a scheme of this scale.

(b) Drainage and Flooding

6.2.12 It is important to note that the Environment Agency has not objected to the proposed scheme on grounds of actual or potential flood risk. However PPG25, Development and Flood Risk, requires that action through the planning system to manage development and flood risk should be based on the precautionary principle, in order to enable informed decisions to be made that are less likely to be found wanting in the longer-term. I have earlier expressed serious reservations concerning the Council's proposals for the drainage of the proposed Broughton Stocklake MDA. It is thus necessary to ensure that the drainage scheme suggested in support of the objector's Counter Proposal is sufficiently robust to overcome these reservations without unacceptable economic or environmental consequences.

6.2.13 As previously noted, the site lies at the heart of a complex drainage system in the most sensitive location in terms of drainage and flood prevention, being upstream of the town. I examined the intricacies of the existing drainage pattern and provision in the Broughton Stocklake area in response to objections to AY.17. There is no need for me to reiterate those details here.

6.2.14 The objector's Counter Proposals comprise a larger mixed-use development area than that encompassed by policy AY.17, and it is envisaged that within this area a greater proportion of the site would be set aside for surface water attenuation and, coincidentally, ecological mitigation. The draft Master Plan produced by the objector indicates that attenuation areas would be provided in the form of a large corridor of open land at the western and southern edges of the site within which Broughton Brook and the existing ponds would be retained. A large area of informal open space alongside the Canal and Broughton Brook would provide additional protection against severe, ie greater than 1 in 100 years, food events.

6.2.15 It is suggested that a linear two stage open channel linking with Broughton Brook, together with a series of shallow attenuation basins and ponds, would be provided within the corridor of open land. The objector maintains that this system would regulate the

surface water run-off from the proposed development to the existing channel and shallow basins, ponds and wetlands for a 100 year event, while surface flooding of open land adjacent to the ponds and channel would provide protection against events with a return period in excess of 100 years. Surface water sewers within each development cell would be designed with pipe capacity for a 2 year event, and sufficient total capacity provided in pipes and manholes to prevent surcharging during a 30 year event.

- 6.2.16 The objectors maintain that the proposed drainage system is based on sustainable drainage techniques, as advocated in Appendix 4 of PPG25, that seek to mimic natural drainage patterns. Thus, instead of channelling an unregulated surface water discharge to a single pond or series of ponds at the western end of the site, the suggested system would employ a series of shallow ponds and wetlands with flow controls (flumes or weirs) to provide sequential attenuation across the site. This technique would slow down the rate of flow and, it is maintained, provide a safer and more environmentally friendly form of flood control.
- 6.2.17 The proposed channel would follow a sinuous alignment towards the northern edge of the open corridor at the eastern end of the site at a gradient that would vary between 1 in 40 and 1 in 2500. It is proposed that the northern bank would be set above natural ground level to protect development to the north. The southern bank would be set lower acting as a side weir permitting water to flow into and out of ponds and wetlands immediately to the south. It is calculated that the channel, ponds and wetlands would provide some 38,000m³ total storage capacity. The water table in the Broughton Stocklake area is typically encountered at a depth of 1m or more below ground level in summer, but is understood to be significantly higher in winter. The pond and wetland areas would thus be calculated on the basis of a maximum storage depth of 0.5m to allow for winter conditions. The overall effect of the system would be to maintain base flows in Broughton Brook and to restrict flood flows to existing and acceptable rates of discharge approved by the EA.
- 6.2.18 The existing flood storage areas on the Bear Brook and Stocklake Brook would not be affected by the proposed development or drainage scheme; similarly no works are proposed to the Canal or the Broughton Brook culvert. The objector thus maintains that surface water drainage proposals would not compromise the efficiency of the AFAS.
- 6.2.19 In addition, the objectors maintain that they have adopted a conservative approach with regards to impermeability factors and on-site attenuation, and run-off for the site has been calculated in accordance with methodology agreed with the EA.
- 6.2.20 In response, the Council maintain that the objector's proposals provide no greater standard of drainage provision or flood protection than that advanced in support of their AY.17, Broughton Stocklake MDA allocation. Both provide for a 1 in 100 year event as advocated by the EA. Furthermore, the objectors do not appear to have taken into account the fact that the expanded site drains into three different catchments, namely Broughton Brook, Stocklake Brook, and towards Hulcott. No indication is given as to how the northern part of the site will be drained.
- 6.2.21 It is apparent from the above that, notwithstanding the apparent lack of information concerning the northern part of the site, the intricacies of the existing drainage pattern have again necessitated the formulation of a complex drainage scheme; one that is significantly more complex and 'land hungry' than that proposed for the original AY.17 proposal. And again it appears that, in addition to being reliant upon the successful performance of a number of inter-related components, the scheme would require a high

degree of maintenance which the EA recognise (in response to the original AY.17 proposal) can be problematic. Nevertheless, I acknowledge the EA's view *that from a Development Control point of view (ie flooding implications, control of run-off etc) [the objector's] scheme is acceptable to the Environment Agency*. On-the-other-hand, the EA have categorically stated that their primary concern regarding the Broughton Stocklake sites and surrounding area is ecological.

- 6.2.22 I have earlier recognised, in response to objections concerning policy AY.17, that the Broughton Stocklake area is of considerable ecological significance, sufficient in itself to warrant deletion of the proposed Broughton Stocklake MDA. The ecological importance of the area is to a large extent determined and sustained by the winter flooding regime that affects parts of the site. The objector's drainage proposals would radically alter this regime. I anticipate that the existing surface water storage areas would be used more frequently and to a greater depth than has hitherto been the case. This, together with the excavation required for the creation of proposed attenuation areas, would have a dramatic and significantly detrimental impact on the ecology of the area. Furthermore, I am not persuaded that the extensive area of open land that it would be necessary to set aside for flood alleviation purposes both within and outside of the site, or indeed other on and off-site mitigation measures, would adequately compensate for the loss of existing habitats within the proposed development area.
- 6.2.23 The objector's propose that some 38,000m³ of total surface water storage capacity will be provided within the site (increased at the inquiry by the objector to 42,000m³ following reconsideration of impermeability factors). While there is no evidence before me to cause me to question this total, I note that its calculation is based on the assumption that the winter water table is some 0.5m below ground level. However, objectors to AY.17 have earlier suggested that the winter water table may be as little as 250mm below ground level. If this is the case, and my on-site observations lead me to believe that it may be so, the area of land required for ponds and wetlands for attenuation purposes would be considerably greater than that suggested by the objector. An increase in the area required would, in turn, exacerbate the adverse impact the proposed drainage scheme would have on the ecological importance of the area.
- 6.2.24 My concern regarding the possible need to increase the area required for surface water attenuation is deepened by the fact that, as noted in response to objections to AY.17, the high water table would make on-site source control difficult, and possibly impossible, to achieve for all but a few of the types of development proposed.
- 6.2.25 I am also concerned to note that there are significant differences between proposals submitted on behalf of the objector and the Broughton Stocklake development consortium for dealing with overflow from the Canal. Following prolonged winter rainfall, high water-levels in the Canal can result in overflow onto the Broughton Stocklake site, while water overflowing the southern bank can be brought into the site by culverts under the Canal. The development consortium suggest two storage lagoons south of the Canal, east of Broughton Lane, to assist in regulating the flow of floodwater down the Canal and to increase the amount of flood storage available; the total storage capacity in these bunded lagoons would be some 100,000m³. In contrast, the objectors do not propose any works to the Canal. While irregular in occurrence, overtopping of the Canal takes place from time to time with varying degrees of severity, and is expected to increase in future years in both regularity and severity. Thus, while I offer no criticism or support for the consortium's proposal, I am concerned that this aspect of flood prevention does not appear to have been addressed by the objector.

- 6.2.26 PPG25 advises that it is necessary to recognise the uncertainties inherent in predicting flooding and recognises that flood risk is expected to increase as a result of climate change. However, the objector's drainage proposals appear to pay little, if any, heed to possible long-term changes in the frequency and intensity of flooding. While I acknowledge that predictions of this kind are an inexact science, climatic changes and a consequential increase in the tendency to flood would result in those areas of proposed informal open space alongside the Canal and Broughton Brook being flooded with increased regularity. This would detract from their recreational value to the scheme as a whole. Furthermore, an infrequent sequence of flooding would reduce the ecological value of this area, given that the maintenance of ecological habitats is largely dependent upon an undisturbed rhythm of climatic and other natural phenomena.
- 6.2.27 In conclusion, while I acknowledge the EA's opinion that the counter proposal can be satisfactorily drained, I am concerned regarding the long-term effectiveness of elements of the drainage scheme, and am not persuaded that drainage can be achieved in a manner that is environmentally appropriate or without unacceptable ecological consequences.

(c) Visual Intrusion

- 6.2.28 The counter proposal site lies on the north-eastern edge of the town, north of the Aylesbury Arm of the Grand Union Canal, and extends just under 2km into the predominantly open countryside between Burcott and Broughton. However, unlike the proposed Broughton Stocklake MDA, the counter proposal extends northwards to effectively link with Bierton / Burcott village. The draft Master Plan produced by the objectors indicates that separation between existing and proposed developments will be maintained by intervening areas of informal open space. However, given the scale and proximity of the proposed development, together with presumed pedestrian and cycleway links between the village and development, this would not, in my view, be sufficient to maintain realistic separation between the two. I have earlier concluded in response to objections suggesting that Bierton / Burcott village should be included on the Aylesbury Inset of the Proposals Map that, in the context of the Plan's overall strategy, it is desirable to maintain separation between the two settlements in order to respect and maintain their individuality. Extending the MDA in the manner proposed would conflict with that conclusion.
- 6.2.29 The Council maintains that the area of open space indicated on the draft Master Plan at the western end of the site would, in effect, divorce the proposed extended MDA from Aylesbury. And that as a result, the Counter Proposal represents either a new stand-alone settlement or an extension of Bierton village. I do not wholly agree. In my view the separation distance between existing and proposed developments, being a minimum of some 200m, would be comparable to that between the north-western built-up edge of Aylesbury and the proposed south-eastern edge of the built-up edge of Berryfields MDA – given the need there to respect the integrity of the River Thames floodplain. The Counter Proposal would thus not appear as an extension to Bierton but, as stated above, an urban extension that both physically and visually links Aylesbury with Bierton / Burcott.
- 6.2.30 The proposed site is relatively flat, rising gently towards its north-eastern edge, with relatively fewer substantial trees or hedgerows east of Broughton Lane. Although largely screened from the south by the Canal and to some extent from the north by the existing pattern of development and intervening hedgerows, the canal towpath provides sweeping elevated views into and across the site. Development of the site as proposed would thus result in an extensive and visually intrusive area of built development in open

countryside which, because of the elevated nature of towpath views, would be difficult to effectively screen and impossible to satisfactorily absorb into the landscape.

- 6.2.31 In conclusion, the counter proposed would, in my view, comprise a visually intrusive area of built development extending into open countryside. Furthermore, by effectively linking Aylesbury with Bierton / Burcott village, the proposal would compromise the character of the latter as a separate rural settlement.

(d) Ecological Impact

- 6.2.32 PPG9, Nature Conservation, requires LPAs to have regard to the relative significance of international, national, local and informal designations in considering the weight to be attached to nature conservation interests, while taking care to avoid unnecessary constraints to development. The presence of a protected species is a material consideration to be taken into account when considering development proposals, including the allocation of land for residential development.
- 6.2.33 As previously noted in response to objections to policy AY.17, Broughton Stocklake is an ecologically diverse area, comprising predominantly pastoral fields and meadows defined by managed and unmanaged hawthorn and blackthorn hedgerows. The hedges contain a variety of mature trees, including oak, ash and the nationally scarce black poplar. The former railway embankment that crosses the proposed extended MDA is dominated at its western end by scrub, with mature trees and grassland. The southern boundary is defined by the Aylesbury Arm of the Grand Union Canal, with its own distinctive linear ecological character. Broughton Brook passes through the site; the site also contains several ponds, including two man-made trout ponds. The ecological value of the site, which is intrinsically high as a result of the diverse range of habitats and in parts low level of management, is enhanced by the tendency of parts of the area to flood. Some of these areas can flood as late as August. Such areas are now very rare. However, the wet grassland at Broughton Stocklake survives because floodwater collects here and then, because of the high water table, shallow gradients and clay sub-soil, cannot easily drain off-site.
- 6.2.34 No statutory nature conservation designation, such as SSSI, covers any part of the Counter Proposal site. However, parts have been identified as non-statutory Biological Notification Sites (BNS). Throughout Buckinghamshire BNSs are being reviewed and re-assessed as Sites of Importance for Nature Conservation (SINC). PPG9 notes that the name and status of this type of site varies considerably throughout the country. The BNSs at Broughton Stocklake, which I understand have yet to be reviewed, comprise the Aylesbury Arm of the Grand Union Canal, Broughton Brook, Stocklake Pastures and Pond, and Broughton Pastures.
- 6.2.35 I reviewed the range of habitats and ecological significance of the proposed Broughton Stocklake MDA in some detail in response to objections to policy AY.17. There is no need for me to reiterate those details here. Suffice to say that I concluded that the site is species rich in both flora and fauna, and that many of these are protected by international or national legislation. Others are afforded non-statutory Countywide protection. There was no doubt, in my view, that the area is of County importance for biodiversity. And it seemed to me that this value was enhanced by the site's proximity to Aylesbury, enabling its pleasures to be appreciated by local residents and visitors alike. Extension of the MDA in the manner proposed would result in development encroaching onto areas of less, but still of some, ecological value, comprising in the main semi-improved grasslands in more intensive agricultural use. However, development of the Counter

Proposal site as a whole would result in the loss of various important habitats in the ecological heart of the site, a significant reduction in the scale of others, and the disruption of the complex inter-relationship between them all.

- 6.2.36 The objector proposes various on and off-site mitigation measures that seek to compensate for or otherwise minimise damage to the complex ecological structure within the site. These include the retention, as far as practicable, of existing natural features, including hedgerows, trees, ponds, and the brook, and the incorporation of buffer zones and open spaces. However, as I have previously concluded, it seems to me that the variety and nature of habitats within the site are such that it would be difficult, and in my view probably impossible, to recreate the conditions that presently exist sufficient to satisfactorily mitigate the damage, disturbance or destruction of species and habitats that would be occasioned by the proposed development. As a result, there would be a serious and irreversible decline in the variety and number of, in particular, birds and mammals breeding within or visiting the site, and a similar but less discernible loss of flora. Furthermore, as noted above, it seems to me that proposals for draining the site would themselves conflict with suggested mitigation measures by seriously disrupting the existing flooding regime. The frequent shallow flooding of parts of the site for extended periods is one of the most important contributors to its ecological value, and disruption of this regime would be seriously harmful to plant and especially bird life. I am also concerned that, despite the objector's best intentions, the massive increase in public disturbance within proposed mitigation areas compared to that presently endured would seriously diminish their value as habitats for other than the hardiest of species.
- 6.2.37 I of course continue to recognise that open space, retained hedgerows, landscaping and domestic gardens would themselves provide a variety of habitats, the ecological value of which should not be underestimated. However, while I am satisfied that the ecological value of new development at Berryfields and Weedon Hill is equivalent to and possible exceeds the ecological value of the existing sites, there can be no such similar comparison at Broughton Stocklake.
- 6.2.38 In conclusion, and as earlier stated, Broughton Stocklake is, in my view, a quiet haven for a variety of valuable flora and fauna. Development within this area would conflict with advice in PPG9 by failing to take full account of nature conservation considerations. In common with the proposed MDA, the development of the extended area would result in serious damage to, and the possible destruction of, its most valuable habitats, and significant harm to the overall ecological value of the area. Suggested mitigation measures would be inadequate to compensate for this loss. I thus remain firmly of the view that development that would have such harmful ecological consequences should be resisted.

(e) Miscellaneous Issues

- 6.2.39 The counter proposal site is situated immediately east of Oakfield Road / Douglas Road, beyond the eastern end of Stocklake. The draft Master Plan prepared by the objectors indicates the extension of the proposed Stocklake PPTC beyond the eastern end of Stocklake, passing through the southern part of the proposed development, linking through to a park and ride facility situated towards the eastern edge of the objection site. A second, non-PPTC, route would also continue from the end of Stocklake, passing through the northern part of the objection site, joining with the proposed ELR that would link the A41(T) with the A418. Inter-connecting links would be provided throughout the site.

- 6.2.40 I appreciate that these are draft proposals and have not been subject to detailed scrutiny. However, I have no doubt that they could be amended if / as necessary to provide a satisfactory highway / public transport network throughout the suggested scheme.
- 6.2.41 I have already confirmed my view, in response to objections to policy AY.17, that Stocklake is suitable for adaptation to form a PPTC. I am thus satisfied that it is physically capable of forming a satisfactory link between the objection site and town centre, with PPTC connection to the proposed Berryfields MDA beyond.
- 6.2.42 Likewise I am satisfied that requisite social and commercial infrastructure necessitated by the suggested extended MDA, eg schools, low cost and affordable housing, etc, together with other facilities identified by the Council for inclusion within the proposed Broughton Stocklake MDA, eg retail warehousing, an hotel, etc could be satisfactorily accommodated within the extended site. Similarly, I have no doubt that identified potential constraints to development, including rights of way, overhead powerlines, etc could be overcome.

A 'Balanced' Strategy

- 6.2.43 The objectors maintain that a fundamental strength of their proposal is that it would enable the Plan to be restructured to provide two large mixed-use MDAs, one at Berryfields the other at Broughton Stocklake, linked via the town centre by means of a high quality PPTC. This would focus development and expenditure at two primary locations and obviate the need for the Weedon Hill and Aston Clinton Road MDAs. However, it is evident from my above comments that I am not persuaded that the suggested extension of the proposed Broughton Stocklake MDA would resolve fundamental problems associated with the DDLP proposal. It thus follows that I shall recommend that no modification be made to the Plan in response to this Counter Proposal.
- 6.2.44 Notwithstanding the fact that my consideration of the suggested 'balanced' two MDA strategy is thus somewhat academic, I nevertheless recognise the merits of concentrating development at two MDAs, linked by means of a cross-centre PPTC. This pattern of development would help to focus physical and financial resources, and in theory increase the effectiveness of the PPTC. However, while worthy in principle, these advantages are insufficient to override fundamental objections to development at Broughton Stocklake.
- 6.2.45 Furthermore the counter proposal involves the deletion of the Weedon Hill and Aston Clinton Road MDAs, both of which I have already concluded are acceptable in principle. While, again in theory, the housing proposed at Weedon Hill could be provided elsewhere, I remain firmly of the view that Aston Clinton Road is the most suitable location for the proposed business park, being advantageously situated for the A41(T) and capable of forming an impressive business 'gateway' into the town in a parkland setting. The objection site would be unable to match these advantages. The deletion of the Aston Clinton Road MDA would thus seriously undermine the employment strategy of the Plan.

Conclusions

- 6.2.46 I recognise that there is some merit in a 'balanced' strategy, comprising two MDAs linked by means of a cross-centre PPTC; however, this limited merit does little to counteract my objections to an enlarged Broughton Stocklake MDA. There are, in my view, fundamental objections to development at Broughton Stocklake that cannot be satisfactorily overcome. Furthermore, as I have earlier identified sufficient land on suitable sites in Aylesbury to meet the requirements of the Plan, I can find no reason in

terms of existing or longer-term need to countenance allocation of the Counter Proposal site.

Recommendation:

6.2.47 I recommend that no modification be made in response to this objection.

6.3 CP006 NCP Car Park, Buckingham St, Aylesbury

Objector:

DD1726 Aylesbury Vale Friends of the Earth

Principal Issue:

6.3.1 Whether the NCP car park in Buckingham Street had potential as a brownfield site for housing.

Inspector's Considerations and Conclusions:

6.3.2 This site has been redeveloped for housing since this objection was made. I thus need make no further comment.

Recommendation:

6.3.3 I recommend that no modification be made in response to this objection.

6.4 CP007 Petrol Filling Station, Buckingham St. / Oxford Rd, Aylesbury

Objector:

D1727 Aylesbury Vale Friends of the Earth

Principal Issue:

6.4.1 Whether the Petrol Filling Station on the corner of Buckingham Street / Oxford Road should be allocated for housing.

Inspector's Considerations and Conclusions:

6.4.2 The objection site is currently occupied by as a petrol filling station and car wash with a two-storey office building (Litton House) above. Buckingham Street and Oxford Road bound the site to the north and west respectively, and a surface car park borders the site to the south. To the east, along Buckingham Street, is a mix of uses, including residential units, shops and food / drink establishments. The site lies beyond the Central Shopping Area but falls just inside the Aylesbury Town Centre.

6.4.3 Notwithstanding issues of access and other site-specific concerns, this site may, in principle, be suitable for residential development. Indeed, the LPA acknowledged that the site has potential for housing in their Pre-Deposit Issues Paper. However, I am not persuaded that there is any certainty that this site will become available for redevelopment during the Plan period. The site is presently in active use, and there is no evidence to suggest that this situation will change in the foreseeable future.

6.4.4 PPG advice requires sites allocated for housing to be suitable and realistically available for development during the Plan period. This site fails to meet the second of these

fundamental criteria. However, should the site become available, any application for redevelopment can be assessed against relevant policies in the Plan.

Recommendation:

- 6.4.5 I recommend that no modification be made in response to this objection.

6.5 CP008

6.6 Penn Road, Aylesbury

Objector:

DD0513 Rail Properties Ltd

Principal Issue:

- 6.6.1 Whether an area of land adjoining the Schwarzkopf development off Penn Road should be allocated for housing.

Inspector's Considerations and Conclusions:

- 6.6.2 Planning permission for the redevelopment of this site was granted on appeal in August 1999.
- 6.6.3 As planning permission has been granted, it would be inappropriate to include the site as a brownfield allocation in the Plan. However, the Council propose that it be shown on the Proposals Map as a Site of Housing Commitment, ORC 0.02.
- 6.6.4 I am satisfied that the appeal decision and ORC resolve this objection.

Recommendation:

- 6.6.5 I recommend that no modification be made in response to this objection, but that the Proposals Map be modified in accordance with ORC 0.02.

6.7 CP009 St. Andrew's Way, Aylesbury

Objector:

DD6911* Crest Homes Eastern Ltd

* objection withdrawn

Principal Issue:

- 6.7.1 Whether part of the St Andrew's Way industrial area should be allocated as a brownfield site for housing.

Inspector's Considerations and Conclusions:

- 6.7.2 I note that this objection has been withdrawn, and thus make no recommendation.

Recommendation:

- 6.7.3 None.

6.8 CP010 New Street, Aylesbury

Objector:

DD1323 British Telecommunications plc

Principal Issue:

- 6.8.1 Whether the BT telephone exchange on New Street should be allocated as part of the Cambridge Close Retail Park.

Inspector's Considerations and Conclusions:

- 6.8.2 The objection site is situated on the northern side of New Street, near to the centre of Aylesbury, and is presently occupied by a substantial BT telephone exchange / office building. The northern side of New Street consists mainly of residential properties interspersed with commercial buildings. North of the objection site is an AVDC depot and associated yard, beyond which is a fire station. Beyond the fire station, on both sides of Cambridge Close, are large retail warehouses forming the Cambridge Close Retail Park, with access off Cambridge Street. The depot and fire station have been allocated in the DDLP as an extension to the retail park, with its use being limited to the sale of bulky goods. (See policy AY.39 Chapter 5). The objector maintains that this allocation should be extended to include the New Street telephone exchange site which, it is anticipated, will become available for redevelopment, during the Plan period.
- 6.8.3 The Council recognise that, under the terms of the sequential test set out in PPG6, the telephone exchange occupies an edge of centre site, and that its redevelopment for retail purposes would, subject to appropriate control over the nature of goods that may be sold, support the town centre. Accordingly they suggest that the site be included within the retail park allocation, excluding that part fronting New Street which should be retained for housing (PC 5.7).
- 6.8.4 I am agree that the extension of the retail park as suggested by PC 5.7, subject to control under AY.39 as recommended to be modified, accords with PPG6 advice. And recommend accordingly.

Recommendation:

- 6.8.5 I recommend that the Plan be modified in accordance with PC 5.27.

**6.9 CP021 Berryfields Farm, Aylesbury, and
CP049 North of Berryfields, Aylesbury**

Objector:

DD7611 The Berryfields Consortium

DD2584* The Berryfields Consortium

* objection withdrawn

Principal Issues:

- 6.9.1 Whether the Berryfields Farm buildings should be included within the proposed Berryfields MDA.
- 6.9.2 Whether parts of the open amenity land required under policy criterion AY.15m) could be provided outside of the MDA.

Inspector's Considerations and Conclusions:

- 6.9.3 Berryfields Farm presently comprises 145.7ha of land with associated farm house and buildings. Some 106ha of the farm will be taken by the proposed Berryfields MDA, leaving a residual 40ha of arable land immediately north of the development area. The farmhouse (a Grade II listed building) and buildings, which are presently unused, have been excluded from the MDA.
- 6.9.4 The objectors maintain that the farm buildings have no realistic agricultural use, either now or in the future, and that inclusion within the MDA will obviate problems of bringing farm equipment and machinery through the MDA, vandalism, and dangers arising from redundant and derelict buildings in close proximity to residential development. Furthermore, the remaining 40ha will not comprise a viable farm unit, and will be farmed, as at present, as part of the owner's farm business that is centred in the Bicester area. This centre of operations provides all of the buildings required to farm the land at Berryfields, with labour and machinery being brought to the farm when required. As a result, the farm buildings are, and will remain, redundant. In reply the Council dispute the objector's view that a 40ha holding would not be viable, and maintain that many similar or smaller sized farms manage to sustain viability. The buildings thus could, and should, form an integral part of a farming enterprise.
- 6.9.5 It is possible that my earlier recommendation that the north-western boundary of the proposed MDA be realigned could marginally increase the extent and hence the viability of the residual area as a free-standing farm unit, but I do not regard this as in any way significant. Rather, it seems to me that it would be possible – just - to farm the 40ha as a viable stand-alone unit, and thereby make beneficial use of the farm buildings. But economically this would be a very precarious undertaking, and realistically would, I suspect, only be undertaken by someone with an assured second income, possibly along the lines (as suggested by the Council) of a working hobby. However, experience tells me that someone wishing to 'hobby farm' 40ha would be more likely to want to keep livestock than grow crops, and would therefore be disinclined to purchase land and buildings immediately on the edge of a built up area. In my view, the residual 40ha is thus most likely to be farmed as at present, namely as a remote extension of a distant enterprise, or by sale or on lease to the adjacent or a nearby holding.
- 6.9.6 It appears that the MDA boundary was drawn to exclude Berryfields Farm in the belief that the farm buildings would be used in association with the residual farmland. However, the future of the farm buildings and land are not inexorably linked. It is thus realistic to expect that the farm buildings and land will be separated, and the use of the buildings for farming purposes to permanently cease. Given this probability, it seems to me reasonable for the farmhouse and buildings to be included in the MDA; indeed it would be illogical for them to be excluded. While their precise future use need not be determined at present, indeed none is suggested, inclusion will provide an opportunity for their use to be considered in the context of the wider MDA during preparation of the planning brief, and a beneficial use found; leisure or community uses would perhaps be most appropriate. Inclusion within the MDA and re-use as suggested would thus, in my view, accord with advice in PPG7.
- 6.9.7 I turn now to that part of the objection concerning the possible provision of open amenity land outside of the MDA.
- 6.9.8 Arising from my consideration of submissions concerning the General Location of Development, I have recommended that 65% of housing and employment development

proposed during the Plan period be located in Aylesbury, with provision for the remaining 35% in the Rural Areas (policy ST.1 as recommended to be modified). My consideration of submissions concerning the AVDLP Housing Requirement has enabled me to identify the need for some 4500 dwellings during the period 2001-2011, of which some 3550 need to be provided in the Aylesbury urban area, with the remaining 950 in the Rural Areas (Table 2 as recommended to be modified).

- 6.9.9 My consideration of submissions concerning the Aylesbury Development Strategy has led me to conclude that of the 3550 dwellings required during the Plan period, some 850 will be provided on brownfield sites, with the remaining 2700 being built on allocated greenfield sites. Furthermore, my consideration of detailed submissions concerning the three mixed use MDAs has led me to conclude that the Berryfields and Weedon Hill MDAs are acceptable, but that the Broughton Stocklake MDA should be deleted. Specifically I have concluded that some 1850 (out of a planned total of 3000) dwellings will be built at Berryfields, with a further 850 at Weedon Hill (Table 3 as recommended to be modified).
- 6.9.10 Accordingly I am satisfied that Aylesbury's housing requirements for the period to 2011 can be met on identified brownfield and allocated greenfield sites. It thus follows that there is no need for me to recommend the allocation of any additional or alternative land for housing development, or in principle to express support for any modification that may result in an increase in the extent of land allocated for development or the number of dwellings proposed. Hence I must consider the objector's submissions concerning the provision of open amenity land outside of the MDA in the context of my earlier identification of sufficient land on suitable sites in Aylesbury to meet the requirements of the Plan.
- 6.9.11 The objector's suggestion that parts of the 70ha or thereabouts of open amenity land required under criterion AY.15m) could be provided outside of the MDA must also be considered in more detailed terms in the context of my earlier recommendation in response to objections to AY.15 that the north-western boundary of the proposed MDA should be re-aligned immediately to the south-east of the ridgeline that presently lies within and towards the north-western edge of the site. The objectors maintain that their suggestion would permit greater overall development flexibility within the MDA - it is intimated that some 35ha of amenity land could be located outside of the MDA with a commensurate relaxation of development areas within the site - and allow substantial planting belts to be provided along the northern edge of the MDA to screen the development. However, I have earlier opined that extensive woodland planting would appear alien and should be avoided, and expressed concern that development extending onto, and possibly over, the low ridgeline would result in unacceptable intrusion when viewed across the Vale floor from the north-west. The objector's suggestion would thus negate my earlier conclusions and recommendation.
- 6.9.12 Alternatively, if the boundary were to remain unchanged, the provision of open amenity land outside of the MDA would, I fear, result in development extending even further over the ridge and thereby becoming even more intrusive than that which precipitated my earlier recommendation. I am satisfied that the allocated area, even if marginally reduced as a result of my boundary recommendation, will be sufficient to accommodate all of the development proposed, although I recognise that this may necessitate an increase in the density of residential development overall. Any such increase would, however, still accord with PPG3 advice. Acceding to the objector's request for the

provision of open amenity land outside of the MDA would thus result in the profligate use of land for no proven planning purpose.

Recommendation:

- 6.9.13 I recommend that:-
- 6.9.14 The Proposals Map be modified by the inclusion of the Berryfields Farm buildings within the proposed Berryfields MDA, and policy AY.15 modified accordingly.
- 6.9.15 No other modification be made in response to this objection.

6.10 CP022 Aston Clinton Road, Aylesbury

Objectors:

- DD0057 Mrs Robertson*
- DD4284 Wimpey Homes
- DD5912 Mrs Hayes
- DD5914 Mr Hayes
- DD6200 Waddesdon Parish Council
- DD7615 The Waddesdon Estate
- DD7639 The National Trust
- DD7663 Historic House Hotels Ltd

* objection part withdrawn

Principal Issue:

- 6.10.1 Whether land west of New Road, south of Aston Clinton Road, should be allocated for residential development.

Inspector's Considerations and Conclusions:

- 6.10.2 The objection site comprises some 15.5ha of land west of New Road, south of Aston Clinton Road, immediately beyond the eastern built-up edge of Aylesbury. Objectors suggest that the site could contain some 300-350 dwellings.
- 6.10.3 Arising from my consideration of submissions concerning the General Location of Development, I have recommended that 65% of housing and employment development proposed during the Plan period be located in Aylesbury, with provision for the remaining 35% in the Rural Areas (policy ST.1 as recommended to be modified). My consideration of submissions concerning the AVDLP Housing Requirement has enabled me to identify the need for some 4500 dwellings during the period 2001-2011, of which some 3550 need to be provided in the Aylesbury urban area, with the remaining 950 in the Rural Areas (Table 2 as recommended to be modified).
- 6.10.4 My consideration of submissions concerning the Aylesbury Development Strategy has led me to conclude that of the 3550 dwellings required during the Plan period, some 850 will be provided on brownfield sites, with the remaining 2700 being built on allocated greenfield sites. Furthermore, my consideration of detailed submissions concerning the three mixed use MDAs has led me to conclude that the Berryfields and Weedon Hill MDAs are acceptable, but that the Broughton Stocklake MDA should be deleted. Specifically I have concluded that some 1850 (out of a planned total of 3000) dwellings will be built at Berryfields, with a further 850 at Weedon Hill (Table 3 as recommended to be modified).

- 6.10.5 Accordingly I am satisfied that Aylesbury's housing requirements for the period to 2011 can be met on identified brownfield and allocated greenfield sites. And hence, no matter how suitable this or any other Counter Proposal site may appear to be for development, it may be argued that that level of suitability would not be sufficient to override the fact that I have already identified sufficient land on suitable sites in Aylesbury to meet the requirements of the Plan. It is against the above background that I have considered this objection.
- 6.10.6 The objection site comprises four fields of untended semi-improved grassland and a single field in arable use. However, the objection was amended at the inquiry to exclude the southern (arable) field from the site. The site has, for the most part, clearly defined and defensible boundaries, and adjoins the existing Aylesbury urban area to the west. The existing boundaries provide an element of natural containment, while sporadic built development immediately east of New Road, including the hotel, ensure, in my view, that development would not adversely impact on the character of the countryside east of Aylesbury, nor be unduly intrusive in near, middle or distant views. Furthermore, the site is not subject to any significant agricultural constraint, comprising Grade 3b agricultural land that does not form part of a larger agricultural holding. Likewise, there is no evidence that the site is of ecological importance, neither does it lie within an identified floodplain. Access would be taken off New Road, and there does not appear to be any significant traffic or highway constraint. If required, pedestrian/cycleway links could be provided to assist integration with existing development to the west. Overall there does not appear to be any physical or environmental constraint to development on the site.
- 6.10.7 Residents immediately west of the site have earlier expressed concern that development would have an adverse affect on their amenities. However, any adverse affect would be mitigated by the intervening area of allotments and open space, while on-site landscaping would further minimise any environmental impact. I thus do not regard this concern as a significant constraint.
- 6.10.8 On balance it seems that the objection site is well suited for development, with few, if any physical or environmental constraints. However, as stated above, I have already identified sufficient land on suitable sites in Aylesbury to meet the requirements of the Plan. Allocation of the site at this time is thus unnecessary, and would result in the profligate development of land for which there is no proven planning need. It rests with the Council at to whether they wish to consider the allocation of the site at a future review of the Plan. At that time it would be possible to assess the relationship between the site and the revised pattern of PPTC provision arising out of my recommended deletion of the Broughton Stocklake MDA in the context of PPG13 advice concerning the provision of sustainable means and patterns of transport. And to review the relationship between the site and the Aston Clinton Road MDA in the context of PPG13 advice concerning the desirability of locating new housing in close proximity to employment uses.
- 6.10.9 I note that the Council proposes by means of PC 10.5 to allocate land between Bedgrove and New Road, including the objection site, as a Local Green Gap. This form of allocation was formerly identified and shown on the DDLP as 'Strategic Gap'. I deal with objections to policies RA.2 and RA.3, which relate to Strategic (Local Green) Gaps, in Part 2 of my report. The Council maintain the objector had failed to submit a formal objection to the PC, and is thus not prepared to respond to this part of the objection. However, notwithstanding this impasse and my pending conclusions concerning these

allocations in principle, I can offer no support in isolation for this Proposed Change. The land embraced by PC 10.5 clearly does not form a gap between settlements, but is obviously part of the extensive area of countryside east of the town. Its allocation would thus not serve to prevent coalescence. Rather the PC appears to be a belated attempt to introduce a restrictive, quasi green belt, policy constraint that cannot be justified in this location.

- 6.10.10 In conclusion, therefore, while I am satisfied that there are no physical or environmental constraints to the development of the objection site, my identification of sufficient land elsewhere in Aylesbury to meet the requirements of the Plan precludes its allocation.

Recommendation:

- 6.10.11 I recommend that no modification be made in response to these objections.
- 6.10.12 Although not the subject of objection, I suggest that no modification be made in accordance with PC 10.5.

6.11 CP024 Broughton, Aylesbury

Objectors:

DD1566	M Edmonds
DD1569	M Edmonds
DD6972	Mr Smith
DD7097	Messrs. Armstrong, Collier, Evett, French & Lowe
DD7426	Laing Homes Strategic Land
DD7613	The Waddesdon Estate
DD7637	The National Trust
DD7661	Historic House Hotels Ltd

Principal Issue:

- 6.11.1 Whether land between the proposed Broughton Stocklake and Aston Clinton Road MDAs, either side of Broughton Lane, should be allocated for housing development.

Inspector's Considerations and Conclusions:

- 6.11.2 Objectors suggest that land between the proposed Broughton Stocklake and Aston Clinton Road MDAs, comprising some 14ha either side of Broughton Lane south of the Grand Union Canal and/or the balance of Manor Farm east of Broughton Lane extending to the line of the ELR, should be allocated for residential development. They maintain that the inclusion of this land would enhance the commercial viability of the Broughton Stocklake MDA; ensure that the services, shops and community facilities, together with the ELR, will be provided, and provide a closer visual and physical link between the Broughton Stocklake and Aston Clinton Road MDAs. Objection was also raised to the non-allocation of land at Manor Farm on grounds that the proposed allocation of the site as a Strategic (Local Green) Gap, and consequential anticipated use of the land for informal recreational use by residents of the Broughton Stocklake MDA, would make it impossible to farm successfully. Furthermore, the dissection of the farm by the proposed ELR would likewise adversely affect commercial viability.
- 6.11.3 Arising from my consideration of submissions concerning the General Location of Development, I have recommended that 65% of housing and employment development proposed during the Plan period be located in Aylesbury, with provision for the remaining 35% in the Rural Areas (policy ST.1 as recommended to be modified). My

consideration of submissions concerning the AVDLP Housing Requirement has enabled me to identify the need for some 4500 dwellings during the period 2001-2011, of which some 3550 need to be provided in the Aylesbury urban area, with the remaining 950 in the Rural Areas (Table 2 as recommended to be modified).

- 6.11.4 My consideration of submissions concerning the Aylesbury Development Strategy has led me to conclude that of the 3550 dwellings required during the Plan period, some 850 will be provided on brownfield sites, with the remaining 2700 being built on allocated greenfield sites. Furthermore, my consideration of detailed submissions concerning the three mixed use MDAs has led me to conclude that the Berryfields and Weedon Hill MDAs are acceptable, but that the Broughton Stocklake MDA should be deleted. Specifically I have concluded that some 1850 (out of a planned total of 3000) dwellings will be built at Berryfields, with a further 850 at Weedon Hill (Table 3 as recommended to be modified).
- 6.11.5 Accordingly I am satisfied that Aylesbury's housing requirements for the period to 2011 can be met on identified brownfield and allocated greenfield sites. It thus follows that there is no need for me to recommend the allocation of any additional or alternative land for housing development. And hence, no matter how suitable this or any other Counter Proposal site may appear to be for development, it may be argued that that level of suitability would not be sufficient to override the fact that I have already identified sufficient land on suitable sites in Aylesbury to meet the requirements of the Plan. It is against the above background that I have considered this objection.
- 6.11.6 My recommended deletion of the Broughton Stocklake MDA is particularly relevant with regard to these objections. Submissions suggesting that allocation of the objection site(s) would enhance the viability of the MDA, its services and facilities, secure the construction of the ELR and provide a closer visual and physical link between the Broughton Stocklake and Aston Clinton Road MDAs are no-longer relevant. I deal with objections to policies RA.2 and RA.3, which relate to Strategic (Local Green) Gaps in Part 2 of my report. However, my recommended deletion of the Broughton Stocklake MDA likewise removes those objections concerning the potential impact of informal recreational use arising from development on the commercial viability of Manor Farm.
- 6.11.7 Neither am I persuaded that there is any justification for allocating the site(s) on a stand-alone basis. I have, as stated above, already identified sufficient land on suitable sites in Aylesbury to meet the requirements of the Plan. Furthermore, a significant part of the objection area lies within the Main River Floodplain and is thus liable to flood. Development on or affecting this land would conflict with advice in PPG25, Development and Flooding. Parts are also affected by flooding caused by over-topping of the canal. I am also concerned that much of the site(s) are of some wildlife interest, forming an extension to the important wildlife area to the north. Finally, development in this location would result in the undesirable coalescence of Broughton with Aylesbury.
- 6.11.8 In conclusion, I can find no reason to support the allocation of any part of the objection site(s) for housing development.

Recommendation:

- 6.11.9 I recommend that no modification be made in response to these objections.

6.12 CP025 East of Aylesbury

Objector:

DD1846 Mr Hamilton-Ely

Principal Issue:

- 6.12.1 Whether additional land for housing could be identified along the A41(T), between Aylesbury and Aston Clinton.

Inspector's Considerations and Conclusions:

- 6.12.2 The objector, who objects to development on the northern side of Aylesbury, suggests that land between Aylesbury and Aston Clinton could provide an alternative to the Berryfields MDA.
- 6.12.3 I have earlier expressed support for the Berryfields and Weedon Hill MDAs, and am satisfied that Aylesbury's housing requirement for the period to 2011 can be met on identified brownfield and allocated greenfield sites. It thus follows that, in principle, there is no need for me to recommend the allocation of any additional or alternative land for housing development.
- 6.12.4 The objector did not submit a plan identifying the area to which he refers. Nevertheless, I am not persuaded that the general location between Aylesbury and Aston Clinton would provide an acceptable alternative to the Berryfields MDA. There is approximately 2.5km between the edge of the proposed Aston Clinton Road MDA and the built-up western edge of Aston Clinton. Although there are a number of sporadic clusters of development along this length of road these do not constitute significant 'ribbon development' as the objector suggests. Indeed, the area between the two settlements is generally rural in appearance, comprising flat open agricultural land, contained on both sides of the A41(T) by mature hedgerows.
- 6.12.5 Development along the A41(T) beyond that provided for in the DDLP would thus constitute a major intrusion of built development into predominantly open countryside. As such it would conflict with other objectives and policies in the Plan that seek to resist development that would compromise the open character of the countryside, including that between settlements.
- 6.12.6 I deal with objections to policies RA.2 and RA.3 in Part 2 of my report. However, while not wishing to pre-empt my later conclusions, I recognise that the principle of restricting coalescence in order to safeguard the identity of settlements is a material planning consideration. Aston Clinton is a significant distance from Aylesbury, separated by open agricultural land, and thus cannot be perceived as an extension to the built-up area of the town. Development at the scale suggested would thus result in the coalescence of the two settlements with the inevitable loss of Aston Clinton's individuality.

Recommendation:

- 6.12.7 I recommend that no modification be made in response to this objection.

6.13 CP026 Roadside Services A41(T), Aston Clinton

Objector:

DD7338 Ms S Greenwood & Ms J Ivelaw-Chapman

Principal Issue:

- 6.13.1 Whether a roadside services site should be allocated on the Aston Clinton By-pass.

Inspector's Considerations & Conclusions:

- 6.13.2 The objector seeks the allocation of a 2.6ha site for roadside services at the western end of the Aston Clinton By-pass, which is presently under construction.
- 6.13.3 The objector maintains that the site is well located for the suggested use, will not adversely impact on residential property, and accords with the Government's recommended intervals between service areas.
- 6.13.4 Having regard to the range of existing facilities on the A41(T), I am satisfied that, in advance of the completion of the by-pass at least, there is no overriding case of motoring need that would presently justify the allocation of a roadside services site in this rural location.

Recommendation:

- 6.13.5 I recommend that no modification be made in response to these objections.

6.14 CP027 SE of Aylesbury

Objectors:

DD2151 David Wilson Estates Ltd

DD7524* Mr G W Hammond

* objection withdrawn

Principal Issue:

- 6.14.1 Whether land south-east of Aylesbury, between Aston Clinton Road and Wendover Roads, should be allocated for development as an MDA.

Inspector's Considerations and Conclusions:

- 6.14.2 The objection site comprises some 107ha between Aston Clinton Road (A41(T)) and Wendover Road (A413), immediately south-east of the Aylesbury built-up area. It is suggested that the land should be allocated as a mixed use MDA, comprising some 1,000 dwellings, a business park and other employment uses, a local centre, primary school, formal and informal open space, and associated transportation improvements including public transport, park and ride and a new road link between the A41(T) and the A413.
- 6.14.3 I have earlier considered submissions concerning the General Location of Development strategy, the AVDLP Housing Requirement, and the Aylesbury Development Strategy. I have also considered detailed submissions concerning identified brownfield sites in Aylesbury and the proposed mixed use MDAs.
- 6.14.4 Arising from my consideration of submissions concerning the General Location of Development, I have recommended that 65% of housing and employment development proposed during the Plan period be located in Aylesbury, with provision for the remaining 35% in the Rural Areas (policy ST.1 as recommended to be modified). My consideration of submissions concerning the AVDLP Housing Requirement has enabled me to identify the need for some 4500 dwellings during the period 2001-2011, of which some 3550 need to be provided in the Aylesbury urban area, with the remaining 950 in the Rural Areas (Table 2 as recommended to be modified).

- 6.14.5 My consideration of submissions concerning the Aylesbury Development Strategy has led me to conclude that of the 3550 dwellings required during the Plan period, some 850 will be provided on brownfield sites, with the remaining 2700 being built on allocated greenfield sites. Furthermore, my consideration of detailed submissions concerning the three mixed use MDAs has led me to conclude that the Berryfields and Weedon Hill MDAs are acceptable, but that the Broughton Stocklake MDA should be deleted. Specifically I have concluded that some 1850 (out of a planned total of 3000) dwellings will be built at Berryfields, with a further 850 at Weedon Hill (Table 3 as recommended to be modified).
- 6.14.6 Accordingly I am satisfied that Aylesbury's housing requirements for the period to 2011 can be met on identified brownfield and allocated greenfield sites. It thus follows that there is no need for me to recommend the allocation of any additional or alternative land for housing development. And hence, no matter how suitable this or any other Counter Proposal site may appear to be for development, it may be argued that that level of suitability would not be sufficient to override the fact that I have already identified sufficient land on suitable sites in Aylesbury to meet the requirements of the Plan. It is against the above background that I have considered this objection.
- 6.14.7 The objection site lies immediately beyond the Bedgrove area of Aylesbury, and abuts both the built-up area and Bedgrove Park. It is suggested that within the site built development will extend to a new link road extending from the A41(T) at its junction with the Aston Clinton By-pass, which is presently under construction, to the A413 north of the Bedgrove College / County Farm complex. South of the link road parts of the site would be retained in agricultural use as a buffer between the proposed development and the golf course and agricultural land to the south-east.
- 6.14.8 The site is presently primarily in agricultural use, being used in part for both grazing and arable uses; it is relatively flat, with a strongly structured and compartmentalised landscape of mature hedgerows and trees. Development in this location would extend built development into the open countryside, comparable with that at Weedon Hill but less so than at Berryfields. Development of the objection site would also reduce the gap between Aylesbury and Weston Turville, although this would be unlikely to be very apparent, except on New Road where built development would continue some distance south of the existing hotel complex. When viewed from the A41(T) the proposed development would compliment the Aston Clinton Road MDA, and would thus not appear to unreasonably extend built development into the countryside or significantly further erode the gap between Aylesbury and Aston Clinton. The Council suggest that development on the objection site would be particularly prominent when viewed from the Chiltern Hills to the south-east. I do not agree. The proposed development would be seen in the broad sweep of the town and surrounding countryside in the Vale, and would be significantly less visually intrusive than the proposed Berryfields MDA when viewed from high land to the north and west. Overall, the site is well contained by the local landscape, and thus would not be unduly intrusive in near, middle or distant views.
- 6.14.9 There is no evidence before me that the site is of significant ecological importance, neither does any part lie within an identified floodplain or otherwise appear to be at risk from flooding. Likewise, there are no recorded archaeological constraints.
- 6.14.10 In terms of agricultural land quality, the site is a mix of sub-grades 3a and 3b, comprising some 38ha (36%) Grade 3a and 69ha (64%) Grade 3b, with the higher grade land lying in the southern-central and westernmost parts of the site. The objectors maintain that the site suffers from a range of classic urban fringe problems that restrict its agricultural use

and pose on-going farming difficulties. It is suggested that these could be mitigated in accordance with advice in PPG7 Annex B by locating compatible uses adjacent to farm land, by landscaping and by appropriate layout proposals. However, it seems to me that the site does not suffer any more as a result of its urban fringe location than other comparable sites on the edge of Aylesbury, and indeed appears to suffer less than many. Furthermore, PPG7 states that *in preparing development plans local planning authorities should take account of the quality of agricultural land that would be lost through development proposals* (para. 2.16). And that *where development of agricultural land is unavoidable, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality, except where other sustainability considerations suggest otherwise* (para. 2.17 as amended).

- 6.14.11 The extent of Grade 3a agricultural land throughout the site is a major constraint to the allocation of the site. Furthermore, notwithstanding my earlier conclusion that there is no need for me to recommend the allocation of any additional or alternative land for housing development, there are no sustainability considerations sufficient to override this constraint.
- 6.14.12 Development of the objection site would have a significant impact on traffic generation, congestion and movements throughout the immediate area and beyond, with an anticipated increase in traffic on Aston Clinton Road and Wendover Road and an anticipated reduction along Camborne Avenue and Bedgrove. However, notwithstanding evidence submitted in support of the proposal, it is not possible for me to conclude on the issue of long-term traffic generation and movement. Rather, long-term traffic impact would need to be reassessed having regard to my recommended deletion of the Broughton Stocklake MDA and any consequential changes to PPTC routes. The introduction of a PPTC along the A41(T) Tring Road, linking the proposed Aston Clinton Road MDA with the town centre, would clearly enhance the sustainability of the site.
- 6.14.13 On balance, it seems to me that, while not without constraint, the site is not entirely unsuitable for development. However, I have already identified sufficient land on suitable sites in Aylesbury to meet the requirements of the Plan. Allocation at this time is thus unnecessary, and would result in the profligate development of land for which there is no proven planning need. I note that part of the site was considered for allocation in the Pre-Deposit Issues Paper published during the preparation of the Plan, but that principally for landscape and residential impact reasons the proposed Weedon Hill MDA was chosen instead. It rests with the Council to decide whether to consider the allocation of the site anew at some future review of the Plan. If they so decide, it will then be possible to assess the relationship between the site and the revised pattern of PPTCs in the context of PPG13 advice concerning the provision of sustainable means and patterns of transport. And to review the relationship between the site and the Aston Clinton Road MDA in terms of visual and countryside impact, and of PPG13 advice concerning the desirability of locating new housing in close proximity to employment uses.
- 6.14.14 I note that the Council propose by means of PC 10.5 to allocate land between Bedgrove and New Road that forms part of the objection site as a Local Green Gap. Likewise, that part of the objection site west of this proposed allocation is shown on the DDLP as being within a Strategic Gap. The Council propose that Strategic Gaps be re-named Local Green Gaps, and that development within these Gaps be subject to policies RA.2 and RA.3. I deal with objections to policies RA.2 and RA.3 in Part 2 of my report.

However, notwithstanding my pending conclusions concerning these allocations in principle, I can offer no support in isolation for PC 10.5. The land embraced by PC 10.5 does not form a gap between settlements, but is clearly part of the extensive area of countryside east of the town. Its allocation would thus not serve to prevent coalescence. Rather the PC appears to be a belated attempt to introduce a restrictive, quasi green belt, policy constraint that cannot be justified in this location.

- 6.14.15 In conclusion, therefore, while the site is not without merit there remain significant constraints and unresolved issues appertaining to its possible development. Furthermore, my identification of sufficient land elsewhere in Aylesbury to meet the requirements of the Plan precludes its allocation.

Recommendation:

- 6.14.16 I recommend that no modification be made in response to these objections.
- 6.14.17 Although not the subject of objection, I suggest that no modification be made in accordance with PC 10.5.

6.15 CP028 Wendover Road, Aylesbury

Objectors:

DD7407	Mrs Willoughby
DD7616	The Waddesdon Estate
DD7640	The National Trust
DD7664	Historic House Hotels Ltd

Principal Issue:

- 6.15.1 Whether land west of Wendover Road should be allocated for residential development.

Inspector's Considerations and Conclusions:

- 6.15.2 The objection site comprises some 11ha of rough grazing land west of Wendover Road, A413, immediately south of the built-up edge of Aylesbury. Objectors suggest that it could be developed for up to 350 dwellings.
- 6.15.3 No detailed evidence has been submitted in support of the objection. I am thus unable to comment on the suitability or otherwise of the site in physical or environmental terms. However, objectors suggest that identification of the site by the Council in their Pre-Deposit Issues Paper during the preparation of the Plan indicates its suitability for development.
- 6.15.4 The site was rejected by the Council on grounds that dispersing the development required to meet the objectives of the Plan to a number of smaller sites, as opposed to concentrating development at fewer MDAs, would be least successful in achieving the broad objectives of the Plan. These objectives include creating the best correlation between jobs and homes, minimising the need to travel, providing large concentrations of mixed use developments which can meet most daily needs, and providing sufficient mass of population which can most efficiently be served by public transport and therefore has the best chance of effecting a shift from the car to green transport modes. I have earlier, in response to a range of objections, expressed specific or tacit support for these objectives which both singularly and combined reflect important aspects of the Government's sustainability policy.

- 6.15.5 Furthermore, I have earlier considered submissions concerning the General Location of Development strategy, the AVDLP Housing Requirement, and the Aylesbury Development Strategy. Notwithstanding my recommended modifications to details of these strategies and requirement, I have expressed support for the strategy of locating the majority of proposed development at Aylesbury, and likewise for the strategy of directing new development to identified brownfield sites and mixed use MDAs.
- 6.15.6 My consideration of submissions concerning the Aylesbury Development Strategy has led me to conclude that of the 3550 dwellings required during the Plan period, some 850 will be provided on brownfield sites, with the remaining 2700 being built on allocated greenfield sites. Likewise, my consideration of detailed submissions concerning the three mixed use MDAs has led me to conclude that the Berryfields and Weedon Hill MDAs are acceptable, but that the Broughton Stocklake MDA should be deleted. Specifically I have concluded that some 1850 (out of a planned total of 3000) dwellings will be built at Berryfields, with a further 850 at Weedon Hill (Table 3 as recommended to be modified).
- 6.15.7 Accordingly I am satisfied that Aylesbury's housing requirements for the period to 2011 can be met on identified brownfield and allocated greenfield sites. It thus follows that there is no need for me to recommend the allocation of any additional or alternative land for housing development. And of particular importance, allocation of the objection site would not only conflict with the strategy of directing new development to brownfield sites or MDAs, but would also undermine the aforementioned objectives that form an integral part of the sustainability foundations of the Plan.
- 6.15.8 Finally, the objection site lies within an area identified on the Proposals Map as a Strategic Gap, subject to policies RA.2 and RA.3. The Council propose (by means of PC 10.04) that these be renamed Green Gaps, and I deal with objections to the principle of these Gaps in Part 2 of my report. Notwithstanding my pending conclusions on the Gaps issue, development on the objection site would significantly reduce the gap on Wendover Road between Aylesbury and Stoke Mandeville. In the absence of over-riding need to allocate the site, development in this location would conflict with Plan policy and Government advice to maintain the character of individual settlements and to protect the countryside for its own sake.

Recommendation:

- 6.15.9 I recommend that no modification be made in response to these objections.

6.16 CP029 Lower Road (E), Aylesbury

Objectors:

DD0054	Mrs Robertson	DD5610	Mrs Eldon
DD0340	Mr Robertson	DD6655	Watermead Homes Ltd
DD0348	Mrs Wall	DD6796	Stupples & Co
DD1101*	Vale of Aylesbury CPRE	DD7618	The Waddesdon Estate
DD1730	Aylesbury Vale Friends Of The Earth	DD7642	The National Trust
DD2481	Weston Turville Parish Council	DD7666	Historic House Hotels Ltd

* objection withdrawn

Principal Issue:

- 6.16.1 Whether land off Lower Road, south of Stoke Mandeville Hospital, should be allocated for residential development and station halt.

Inspector's Considerations and Conclusions:

- 6.16.2 The objection site comprises some 20.9ha of predominantly arable land east of Lower Road, immediately south of Stoke Mandeville Hospital. The eastern boundary of the site is defined by the Aylesbury to Marylebone railway line. An objector proposes that the site be allocated for residential development, comprising some 300 dwellings, with provision for a station halt. Other objectors suggest that the site could accommodate some 630 dwellings, as indicated in the Aylesbury Local Plan.
- 6.16.3 The objection site was allocated for housing in the Aylesbury Local Plan, policy A3. However, development was justified by and pre-conditional on the construction of part of the Aylesbury Southern By-pass, policy A4. The Department of Transport subsequently abandoned the Southern By-pass, which effectively removed the allocation from the ALP. In light of these changed circumstances, I do not regard the previous allocation of the site as being material to my consideration of these objections.
- 6.16.4 Arising from my consideration of submissions concerning the General Location of Development, I have recommended that 65% of housing and employment development proposed during the Plan period be located in Aylesbury, with provision for the remaining 35% in the Rural Areas (policy ST.1 as recommended to be modified). My consideration of submissions concerning the AVDLP Housing Requirement has enabled me to identify the need for some 4500 dwellings during the period 2001-2011, of which some 3550 need to be provided in the Aylesbury urban area, with the remaining 950 in the Rural Areas (Table 2 as recommended to be modified).
- 6.16.5 My consideration of submissions concerning the Aylesbury Development Strategy has led me to conclude that of the 3550 dwellings required during the Plan period, some 850 will be provided on brownfield sites, with the remaining 2700 being built on allocated greenfield sites. Furthermore, my consideration of detailed submissions concerning the three mixed use MDAs has led me to conclude that the Berryfields and Weedon Hill MDAs are acceptable, but that the Broughton Stocklake MDA should be deleted. Specifically I have concluded that some 1850 (out of a planned total of 3000) dwellings will be built at Berryfields, with a further 850 at Weedon Hill (Table 3 as recommended to be modified).
- 6.16.6 Accordingly I am satisfied that Aylesbury's housing requirements for the period to 2011 can be met on identified brownfield and allocated greenfield sites. It thus follows that there is no need for me to recommend the allocation of any additional or alternative land for housing development. And hence, no matter how suitable this or any other Counter Proposal site may appear to be for development, it may be argued that that level of suitability would not be sufficient to override the fact that I have already identified sufficient land on suitable sites in Aylesbury to meet the requirements of the Plan. It is against the above background that I have considered this objection.
- 6.16.7 The earlier ALP allocation indicates that there are no over-riding physical or environmental constraints to development on the site, although I understand that a small part may be Grade 3a agricultural land and there is evidence of possible Bronze Age archaeological interest. However, neither objectors nor the Council have submitted substantive evidence concerning these matters, and I am thus unable to comment further.

- 6.16.8 Notwithstanding the consequences of the deletion of the Southern By-pass, the Council rejected re-allocating the site on grounds that dispersing the development required to meet the objectives of the Plan to a number of smaller sites, as opposed to concentrating development at fewer MDAs, would be least successful in achieving the broad objectives of the Plan. These objectives include creating the best correlation between jobs and homes, minimising the need to travel, providing large concentrations of mixed use developments which can meet most daily needs, and providing sufficient mass of population which can most efficiently be served by public transport and therefore has the best chance of effecting a shift from the car to green transport modes. I have earlier, in response to a range of objections, expressed specific or tacit support for these objectives which both singularly and combined reflect important aspects of the Government's sustainability policy. Allocation of the objection site would thus not only conflict with the over-arching strategy of directing new development to brownfield sites or MDAs, but would also significantly undermine the aforementioned objectives that form an integral part of the sustainability foundations of the Plan.
- 6.16.9 Development of the site would also have a significant impact on traffic generation, movement and congestion on Lower Road and the immediate area. The proposed site is distant from any PPTC envisaged in the Plan, and will undoubtedly remain so following any revision to the pattern of provision which may arise as a result of my recommended deletion of the Broughton Stocklake MDA. Furthermore, it seems to me that Lower Road is physically unsuitable for adaptation to form a PPTC.
- 6.16.10 I appreciate that the maximum amount of development envisaged by objectors (630 dwellings), together with that suggested west of Lower Road (170 dwellings, see CP030 below), equates with that envisaged at Weedon Hill MDA. However, I am not persuaded that this is a realistic total, given that it represents a gross density of 30 dwellings/ha and no allowance has been made for requisite landscaping or commercial and social infrastructure. A reduced total would thus appear to be more realistic. This may be insufficient to fund the necessary transport and other infrastructure required to serve the site.
- 6.16.11 The objectors suggest that allocation of the site would enable the provision of a railway station halt, in place of that proposed in the Plan to the north. Notwithstanding my recommendation that the station reservation policy AY23 be deleted (or at the very least reworded), if a station is to be provided in this location it should be positioned as indicated in the Plan to serve both the immediate area and the wider social needs of Stoke Mandeville Hospital. However, given the proximity of the existing Aylesbury and Stoke Mandeville stations, I remain unconvinced that sufficient support or justification can be found for an additional halt on this stretch of line. Certainly, in no way does the offer of a site for a station halt justify allocation of the objection site.
- 6.16.12 Finally, the objection site lies within an area identified on the Proposals Map as a Strategic Gap, subject to policies RA.2 and RA.3. The Council propose (by means of PC 10.04) that these be renamed Green Gaps, and I deal with objections to the principle of these Gaps in Part 2 of my report. However, notwithstanding my pending conclusions on the Gaps issue, development on the objection site would significantly reduce the gap between Aylesbury and Stoke Mandeville. In the absence of over-riding need to allocate the site, development in this location would conflict with Plan policy and Government advice to maintain the character of individual settlements and to protect the countryside for its own sake.

Recommendation:

6.16.13 I recommend that no modification be made in response to these objections.

6.17 CP030 Lower Road (W), Aylesbury

Objectors:

DD7606* Vale of Aylesbury CPRE
 DD7619 The Waddesdon Estate
 DD7643 The National Trust
 DD7667 Historic House Hotels Ltd

* objection withdrawn

Principal Issue:

6.17.1 Whether land west of Lower Road, south of the Kynaston and Stone Leys Schools complex and adjacent sports ground, should be allocated for residential development.

Inspector's Considerations and Conclusions:

6.17.2 The objection site comprises some 5.7ha of predominantly arable land west of Lower Road, immediately south of the Kynaston and Stone Leys Schools complex and adjacent sports ground. Objectors suggest that the site could accommodate some 170 dwellings, as indicated in the Aylesbury Local Plan.

6.17.3 The objection site was allocated for housing in the Aylesbury Local Plan, policy A3. However, development was justified by and pre-conditional on the construction of part of the Aylesbury Southern By-pass, policy A4. The Department of Transport subsequently abandoned the Southern By-pass, which effectively removed the allocation from the ALP. In light of these changed circumstances, I do not regard the previous allocation of the site as being material to my consideration of these objections.

6.17.4 Arising from my consideration of submissions concerning the General Location of Development, I have recommended that 65% of housing and employment development proposed during the Plan period be located in Aylesbury, with provision for the remaining 35% in the Rural Areas (policy ST.1 as recommended to be modified). My consideration of submissions concerning the AVDLP Housing Requirement has enabled me to identify the need for some 4500 dwellings during the period 2001-2011, of which some 3550 need to be provided in the Aylesbury urban area, with the remaining 950 in the Rural Areas (Table 2 as recommended to be modified).

6.17.5 My consideration of submissions concerning the Aylesbury Development Strategy has led me to conclude that of the 3550 dwellings required during the Plan period, some 850 will be provided on brownfield sites, with the remaining 2700 being built on allocated greenfield sites. Furthermore, my consideration of detailed submissions concerning the three mixed use MDAs has led me to conclude that the Berryfields and Weedon Hill MDAs are acceptable, but that the Broughton Stocklake MDA should be deleted. Specifically I have concluded that some 1850 (out of a planned total of 3000) dwellings will be built at Berryfields, with a further 850 at Weedon Hill (Table 3 as recommended to be modified).

6.17.6 Accordingly I am satisfied that Aylesbury's housing requirements for the period to 2011 can be met on identified brownfield and allocated greenfield sites. It thus follows that there is no need for me to recommend the allocation of any additional or alternative land

for housing development. And hence, no matter how suitable this or any other Counter Proposal site may appear to be for development, it may be argued that that level of suitability would not be sufficient to override the fact that I have already identified sufficient land on suitable sites in Aylesbury to meet the requirements of the Plan. It is against the above background that I have considered this objection.

- 6.17.7 The earlier ALP allocation indicates that there are no over-riding physical or environmental constraints to development on the site. However, neither objectors nor the Council have submitted substantive evidence concerning these matters, and I am thus unable to comment further.
- 6.17.8 Notwithstanding the consequences of the deletion of the Southern By-pass, the Council rejected re-allocating the site on grounds that dispersing the development required to meet the objectives of the Plan to a number of smaller sites, as opposed to concentrating development at fewer MDAs, would be least successful in achieving the broad objectives of the Plan. These objectives include creating the best correlation between jobs and homes, minimising the need to travel, providing large concentrations of mixed use developments which can meet most daily needs, and providing sufficient mass of population which can most efficiently be served by public transport and therefore has the best chance of effecting a shift from the car to green transport modes. I have earlier, in response to a range of objections, expressed specific or tacit support for these objectives which both singularly and combined reflect important aspects of the Government's sustainability policy. Allocation of the objection site would thus not only conflict with the over-arching strategy of directing new development to brownfield sites or MDAs, but would also significantly undermine the aforementioned objectives that form an integral part of the sustainability foundations of the Plan.
- 6.17.9 Development of the site would also impact on traffic generation, movement and congestion on Lower Road and the immediate area. The proposed site is distant from any PPTC envisaged in the Plan, and will undoubtedly remain so following any revision to the pattern of provision which may arise as a result of my recommended deletion of the Broughton Stocklake MDA. Furthermore, it seems to me that Lower Road is physically unsuitable for adaptation to form a PPTC.
- 6.17.10 I appreciate that the amount of development envisaged by objectors (170 dwellings), together with that suggested east of Lower Road (630 dwellings, see CP029 above), equates with that envisaged at Weedon Hill MDA. However, I am not persuaded that this is a realistic total, given that it represents a gross density of 30 dwellings/ha and no allowance has been made for requisite landscaping or commercial and social infrastructure. A reduced total would thus appear to be more realistic. This may be insufficient to fund the necessary transport infrastructure required to serve the site.
- 6.17.11 Finally, the objection site lies within an area identified on the Proposals Map as a Strategic Gap, subject to policies RA.2 and RA.3. The Council propose (by means of PC 10.04) that these be renamed Green Gaps, and I deal with objections to the principle of these Gaps in Part 2 of my report. However, notwithstanding my pending conclusions on the Gaps issue, development on the objection site would significantly reduce the gap between Aylesbury and Stoke Mandeville. In the absence of over-riding need to allocate the site, development in this location would conflict with Plan policy and Government advice to maintain the character of individual settlements and to protect the countryside for its own sake.

Recommendation:

6.17.12 I recommend that no modification be made in response to these objections.

6.18 CP035 Coldharbour Farm, Aylesbury

Objectors:

DD2306 Coldharbour Farm Consortium
DD5701 The Ernest Cook Trust

Supporter of Proposed Change (PC 5.37):

DD2306 Coldharbour Farm Consortium

Principal Issue:

6.18.1 Whether the boundaries of the proposed Strategic Gap, Area of Attractive Landscape (AAL), Area of Special Advertisement Control (ASAC), and Parks and Gardens of Special Historic Interest (PGSHI) should be amended on the Proposals Map to take account of the Coldharbour Farm / Fairford Leys development.

Inspector's Considerations and Conclusions:

6.18.2 The objectors are concerned that the allocation of land as part of a Strategic Gap, an Area of Attractive Landscape (AAL) and an Area of Special Control for Advertising (ASCA), conflict with the extant planning permission for land that forms part of the Coldharbour Farm / Fairford Leys development.

6.18.3 The Council acknowledge that it would be inappropriate to include within a Strategic Gap, AAL and ASAC land for which planning permission has been granted. The Council thus propose by means of PC 5.37 to amend the boundaries of the Strategic Gap, AAL and ASAC to reflect the planning permission. I consider objections to policies RA.2 and RA.3 concerning proposed Strategic (suggested to be renamed Local Green) Gaps, and to policy RA.10 concerning proposed AALs in Part 2 of my Report. While not wishing to pre-empt my conclusions regarding these policies, I support the principle of PC 5.7, which rectifies a drafting error.

6.18.4 PPG15, Planning and the Historic Environment, confirms that the role of compiling a register of Parks and Gardens of Special Historic Interest is a matter for English Heritage. The delineation of boundaries for PGSHI is thus a matter for that authority, as also is boundary alteration. As neither delineation nor alteration rest with the LPA, any apparent conflict between the boundary drawn up by EH and an extant planning permission must be resolved by EH, and thus lies beyond the remit of the Local Plan.

Recommendation:

6.18.5 I recommend that, subject to my recommendations concerning policies RA.2, RA.3 and RA.10, the Proposals Map be modified in accordance with PC 5.37.

6.19 CP036 Ellen Road, Aylesbury

Objector:

DD1100* Vale of Aylesbury CPRE

* objection withdrawn

Principal Issue:

- 6.19.1 Whether land to the land west of Ellen Road, south of Oxford Road, should be allocated for residential development.

Inspector's Considerations and Conclusions:

- 6.19.2 I note that this objection has been withdrawn, and thus make no recommendation.

Recommendation:

- 6.19.3 None.

6.20 CP037 Hartwell, Aylesbury

Objector:

DD1834 The Reverend & Mrs Dickinson

Principal Issue:

- 6.20.1 Whether land between Hartwell and Haydon Mill, west of the Coldharbour Farm development, should be allocated for residential development in preference to Berryfields MDA.

Inspector's Considerations and Conclusions:

- 6.20.2 The suggested development area comprises a loosely defined area of predominantly flat farmland west of Aylesbury. The objectors suggest that this would be a better location for a major housing development than Berryfields, which they regard as unsuitable for landscape and traffic reasons, and would provide a more natural 'rounded' shape to the town.
- 6.20.3 I have earlier expressed support in principle for the Aylesbury Development Strategy that seeks to concentrate the additional housing required to meet Aylesbury's housing need to 2011 in three mixed-use MDAs which, it is envisaged, will provide the most sustainable pattern, scale and form of development. And I have likewise concluded that sufficient land has been allocated on brownfield and greenfield sites (but excluding Broughton Stocklake MDA) to meet the town's housing need to 2011. Furthermore, I have assessed the particular merits of the Berryfields MDA, and for the reasons given have found the proposed allocation acceptable having regard to, inter-alia, accessibility to sustainable modes of transport and impact on the countryside.
- 6.20.4 PPG3 set out a sequential test to guide new allocations for housing in order that they accord, as far as practicable, with Government Policy on sustainability. The second most acceptable location for development, after urban brownfield sites, is as an urban extension situated on a good public transport corridor. The area of land between Hartwell and Haydon Mill fails to meet this test given that it would comprise an isolated area of development, surrounded by open farmland, remote from any existing or proposed public transport link. Furthermore, the objection site is presently subject to proposed Strategic Gap and AAL allocations, and part lies within a designated PGSHI. I consider objections to policies RA.2 and RA.3 concerning Strategic (to be renamed Local Green) Gaps and to policy RA.10 concerning AALs in Part 2 of my Report. However, while not wishing to pre-empt my conclusions on these policies, it is clear that, in addition to affecting a designated PGSHI, the suggested development would impact

upon an attractive area of open countryside which, in accordance with PPG7 guidance, should be protected for its own sake.

- 6.20.5 In light of the above it is clear that the objection site accords with neither Government policy on sustainability nor with the Aylesbury Development Strategy. Neither is it needed to meet the housing requirement to 2011. Hence there can be no justification for the allocation of the site, either as an additional allocation or in substitution.

Recommendation:

- 6.20.6 I recommend that no modification be made in response to this objection.

6.21 CP038 Oxford Road, Aylesbury

Objector:

DD1833 The Reverend & Mrs Dickinson

Principal Issue:

- 6.21.1 Whether land between Aylesbury and Stone, west of Walton Court, should be allocated for residential development in preference to Berryfields MDA.

Inspector's Considerations and Conclusions:

- 6.21.2 The suggested area of development consists of a loosely defined area of farmland south-west of Aylesbury, south of the A418. The site rises gently from the built-up edge of Aylesbury towards Stone, and comprises several large fields bounded by mature hedgerows and trees. The objectors suggest that this would be a better location for a major housing development than Berryfields, which they regard as unsuitable for landscape and traffic reasons, and would provide a more natural 'rounded' shape to the town.
- 6.21.3 I have earlier expressed support in principle for the Aylesbury Development Strategy that seeks to concentrate the additional housing required to meet Aylesbury's housing need to 2011 in three mixed-use MDAs which, it is envisaged will provide the most sustainable pattern, scale and form of development. And I have likewise concluded that sufficient land has been allocated on brownfield and greenfield sites (but excluding Broughton Stocklake MDA) to meet the town's housing need to 2011. Furthermore, I have assessed the particular merits of the Berryfields MDA, and for the reasons given have found the proposed allocation acceptable having regard to, inter-alia, accessibility to sustainable modes of transport and impact on the countryside.
- 6.21.4 PPG3 set out a sequential test to guide new allocations for housing in order that they accord, as far as practicable, with Government Policy on sustainability. The second most acceptable location for development, after urban brownfield sites, is as an urban extension situated on a good public transport corridor. The area of land between Walton Court and Stone fails to meet this test given that it would comprise a somewhat detached area of development, remote from any existing or proposed public transport link. Although close to the A418, there is no evidence before me to confirm that this road could be satisfactorily adapted to form a PPTC comparable with that proposed along the A41(T) serving Berryfields MDA; it is possible that highway capacity problems may be encountered at the recently strengthened and widened railway bridge on Oxford Road. Neither is there the long-term potential, as there is at Berryfields, for the site to be served by a railway halt. Furthermore, the objection site is presently subject to a proposed Strategic Gap allocation. I consider objections to policies RA.2 and RA.3 concerning

Strategic (to be renamed Local Green) Gaps in Part 2 of my Report. However, while not wishing to pre-empt my conclusions on these policies, it is clear that the suggested development would impact upon an attractive area of open countryside which, in accordance with PPG7 guidance, should be protected for its own sake.

- 6.21.5 In light of the above it is clear that the objection site accords with neither Government policy on sustainability nor with the Aylesbury Development Strategy. Neither is it needed to meet the housing requirement to 2011. Hence there can be no justification for the allocation of the site, either as an additional allocation or in substitution.

Recommendation:

- 6.21.6 I recommend that no modification be made in response to this objection.

6.22 CP040 Fleet Marston, near Aylesbury

Objectors:

DD0480	Cllr Griffin	DD5993	Mr Tyrrell
DD0674	Mr Clarke	DD6406	Mr Carlyle
DD0795	Mr Miller	DD6554	Mr Bell
DD0811	Mr Miller	DD6813	Mrs Stevens
DD0998	Mrs Miller	DD6820	Mr Stevens
DD1357	Bierton with Broughton Parish Council	DD7005	Mr & Mrs Chantler
		DD7429	Mr & Ms Blackmore & Lynn
DD1552	Mrs Hyre		
DD4375	Mrs Tubb	DD7777	Genesis Homes Ltd & Bryant Homes
DD5609	Mrs Eldon		

Principal Issue:

- 6.22.1 Whether land at Fleet Marston should be allocated for housing and associated development, either in isolation, in substitution for the northern part of the proposed Berryfields MDA, or in substitution for the proposed Broughton Stocklake MDA.

Inspector's Considerations and Conclusions:

- 6.22.2 There are, unsurprisingly, differences between the boundaries of the site proposed for development by the various objectors; the majority refer to the Fleet Marston area in general, potential developers are more site specific. For the purpose of these objections and for clarity I am referring to that area of land west of the Aylesbury – Calvert railway line, extending east/north and west of the A41(T), as shown on plan CP040 in CD13, the AVDC Report of Council's Response to Representations made to the Deposit Draft, Volume III. However, I appreciate - and have taken account of the fact - that this is in excess of the site area suggested by the leading objector, DD7777.
- 6.22.3 The objection area comprises flat, open agricultural land, characteristic of that north-west of Aylesbury on the Vale floor. Objectors suggest that development in this location would be less environmentally damaging and have less visual impact than that proposed in the northern part of the proposed Berryfields MDA or at Broughton Stocklake, and could make better use of a proposed passenger rail service north of Aylesbury. This, together with a park and ride facility and extended PPTC, would reduce car borne travel and thereby enhance the area's sustainability.
- 6.22.4 I have earlier considered submissions concerning the General Location of Development strategy, the AVDLP Housing Requirement, and the Aylesbury Development Strategy. I

have also considered detailed submissions concerning identified brownfield sites in Aylesbury and the proposed mixed use MDAs.

- 6.22.5 Arising from my consideration of submissions concerning the General Location of Development, I have recommended that 65% of housing and employment development proposed during the Plan period be located in Aylesbury, with provision for the remaining 35% in the Rural Areas (policy ST.1 as recommended to be modified). My consideration of submissions concerning the AVDLP Housing Requirement has enabled me to identify the need for some 4500 dwellings during the period 2001-2011, of which some 3550 need to be provided in the Aylesbury urban area, with the remaining 950 in the Rural Areas (Table 2 as recommended to be modified).
- 6.22.6 My consideration of submissions concerning the Aylesbury Development Strategy has led me to conclude that of the 3550 dwellings required during the Plan period, some 850 will be provided on brownfield sites, with the remaining 2700 being built on allocated greenfield sites. Furthermore, my consideration of detailed submissions concerning the three mixed use MDAs has led me to conclude that the Berryfields and Weedon Hill MDAs are acceptable, but that the Broughton Stocklake MDA should be deleted. Specifically I have concluded that some 1850 (out of a planned total of 3000) dwellings will be built at Berryfields, with a further 850 at Weedon Hill (Table 3 as recommended to be modified).
- 6.22.7 Accordingly I am satisfied that Aylesbury's housing requirements for the period to 2011 can be met on identified brownfield and allocated greenfield sites. It thus follows that there is no need for me to recommend the allocation of any additional or alternative land for housing development. And hence, no matter how suitable this or any other Counter Proposal site may appear to be for development, it may be argued that that level of suitability would not be sufficient to override the fact that I have already identified sufficient land on suitable sites in Aylesbury to meet the requirements of the Plan. It is against the above background that I have considered this objection.
- 6.22.8 Objectors claim that development at Fleet Marston in substitution for that in the northern part of the proposed Berryfields MDA would enable better use to be made of the proposed PPTC and a relocated railway halt. With regards to the PPTC, it is evident that an extended PPTC along the A41(T) would be readily accessible for the majority of potential residents within the objection site. However, the suggestion that this would better serve the proposed development area than that serving the Berryfields MDA overlooks the fact that it is proposed to extend the PPTC north-eastwards off the A41(T) into the heart of the MDA, and thereby provide a degree of accessibility similar to that suggested at Fleet Marston. An extended PPTC would be reliant upon the existing alignment of the A41(T); the proposed internal Berryfields PPTC can, of course, be aligned at the design stage to meet the specific requirements of the MDA and thereby provide enhanced accessibility to local services. Furthermore, the objector's proposals would result in greater distances to travel for bus services operating along the PPTC. This would lengthen journey times and may possibly result in reduced patronage.
- 6.22.9 Objectors suggest that improved accessibility to a relocated station halt, together with a similarly relocated park and ride site, would help to reduce reliance on the private car and traffic levels overall. I have earlier recommended that policy AY.23 be deleted on grounds that there is no evidence that the proposed station will materialise during the Plan period, while suggesting that, if retained, the policy should seek to prevent development that may prejudice the possible long-term provision of this facility. Notwithstanding the absence of any mechanism to provide a station, together with doubt

as to whether a passenger service will be re-instated along this length of line during the Plan period, I remain firmly of the view that there is no demonstrable evidence that a viable rail service could be developed for short journeys between Berryfields and the town centre. Hence, in my view, any inherent or perceived advantage the Fleet Marston area may appear to have in terms of accessibility to a relocated rail halt is of little weight compared to the firm intention and greater flexibility available at Berryfields to provide a more comprehensive and sustainable bus orientated transport network.

- 6.22.10 Furthermore, while not a determining factor, it seems to me that the physical shape of the suggested Fleet Marston development would be more likely to lead to greater travelling distances for residents seeking local services than need be the case. In contrast to the somewhat contrived Fleet Marston proposals, which appear to reflect commercial interests rather than local landscape or other physical features, the Berryfields scheme is more compact, enabling the provision of a central core for local services. This central core would be more accessible to the majority of prospective residents than an equivalent core in the Fleet Marston proposal, and thereby enhance its sustainability.
- 6.22.11 I do not share an objector's view that maintaining development under the 75-metre contour would necessarily equate to a reduced level of visual impact. A particular concern with regards to the suggested Fleet Marston proposal is the degree to which the site extends into open countryside. Whereas the proposed Berryfields MDA is contained within the local landform, and can be more readily absorbed by careful landscaping, the more linear form of development suggested at Fleet Marston would extend development further along the A41(T) from the built-up area, and by reason of its overall shape would be more difficult to absorb into the local landscape.
- 6.22.12 I have considered objections to the proposed Weedon Hill MDA elsewhere in my report and, as noted above, concluded that it, together with the Berryfields MDA, is acceptable. There is no reason for me to revisit those objections here. However, the lead objector suggests that the Weedon Hill MDA, together with the WLR and safeguarded route for the NLR, should be deleted in order to help achieve the strategic objectives of the Plan, namely the greater concentration of new development at the north-western end of the cross-town PPTC. This, it is suggested, would maximise the use and viability of the PPTC, and effectively reduce the town's dependency on the private car. However, in my view neither the Weedon Hill MDA nor the proposed WLR undermine the general development strategy for Aylesbury. To the contrary, the link road provides the opportunity to integrate the two major housing developments to the north of Aylesbury, enabling best use to be made of both sites. Furthermore, my recommended deletion of the Broughton Stocklake MDA undermines the concept of a cross-town PPTC.
- 6.22.13 Several objectors have suggested that Fleet Marston would be a more suitable location for development than the Broughton Stocklake MDA. I have earlier considered detailed objections to the Broughton Stocklake MDA and recommended that it be deleted. I assume that recommendation resolves these objectors' primary concern. However, my conclusions regarding the General Location of Development strategy, the AVDLP Housing Requirement and the Aylesbury Development Strategy have led me to conclude that there is no need for me to recommend the allocation of land in Aylesbury in substitution for that deleted at Broughton Stocklake, whether to the north-west of the town or elsewhere.
- 6.22.14 In conclusion, I am not persuaded that development at Fleet Marston would in any way be more acceptable than the proposed Berryfields MDA. Indeed there are clear

environmental and functional disadvantages to development at Fleet Marston and few, if any, advantages over Berryfields to offer in support.

Recommendation:

- 6.22.15 I recommend that no modification be made in response to these objections.

6.23 CP041 Watermead, Aylesbury

Objectors:

DD2303	Trustees of W T Bell, Deceased
DD7617	The Waddesdon Estate
DD7641	The National Trust
DD7665	Historic House Hotels Ltd

Principal Issue:

- 6.23.1 Whether land north of Watermead should be allocated for residential development.

Inspector's Considerations and Conclusions:

- 6.23.2 The owner of 1.6ha of land immediately north of the Watermead development suggests that the site could be developed for some 40 dwellings. Other objectors suggest that an area north of Watermead considered by AVDC during the preparation of the Plan as a potential housing site could accommodate some 140 dwellings. The objectors did not submit a plan identifying this site. However, I surmise that it is that shown on plan CP041 in CD13, the AVDC Report of Council's Response to Representations made to the Deposit Draft, Volume III
- 6.23.3 The principle of developing the larger site (together with other peripheral greenfield sites) was rejected by the Council on grounds that dispersing the development required to meet the objectives of the Plan to a number of smaller sites, as opposed to concentrating development at fewer MDAs, would be least successful in achieving the broad objectives of the Plan. These objectives include creating the best correlation between jobs and homes, minimising the need to travel, providing large concentrations of mixed use developments which can meet most daily needs, and providing sufficient mass of population which can most efficiently be served by public transport and therefore has the best chance of effecting a shift from the car to green transport modes. I have earlier, in response to a range of objections, expressed specific or tacit support for these objectives which both singularly and combined reflect important aspects of the Government's sustainability policy.
- 6.23.4 Likewise I have earlier considered submissions concerning the General Location of Development strategy, the AVDLP Housing Requirement, and the Aylesbury Development Strategy. Notwithstanding my recommended modifications to details of these strategies and requirement, I have expressed support for the strategy of locating the majority of proposed development at Aylesbury, and likewise for the strategy of directing new development to identified brownfield sites and mixed use MDAs.
- 6.23.5 My consideration of submissions concerning the Aylesbury Development Strategy has led me to conclude that of the 3550 dwellings required during the Plan period, some 850 will be provided on brownfield sites, with the remaining 2700 being built on allocated greenfield sites. Furthermore, my consideration of detailed submissions concerning the three mixed-use MDAs has led me to conclude that the Berryfields and Weedon Hill

MDAs are acceptable, but that the Broughton Stocklake MDA should be deleted. Specifically I have concluded that some 1850 (out of a planned total of 3000) dwellings will be built at Berryfields, with a further 850 at Weedon Hill (Table 3 as recommended to be modified).

- 6.23.6 Accordingly I am satisfied that Aylesbury's housing requirements for the period to 2011 can be met on identified brownfield and allocated greenfield sites. It thus follows that there is no need for me to recommend the allocation of any additional or alternative land for housing development. Furthermore, and of particular importance, allocation of the objection site would not only conflict with the strategy of directing new development to brownfield sites or MDAs, but would also undermine the aforementioned objectives that form an integral part of the sustainability foundations of the Plan.
- 6.23.7 It has been suggested that the smaller of the two objection sites should be allocated on grounds that it is readily available for development, and would thereby help to meet an anticipated housing shortfall arising from possible delays in bringing the MDAs on stream. Development could thus be undertaken without prejudicing the overall objectives of the Aylesbury Development Strategy. However, I have taken possible delays in the development process into account in my assessment of the Aylesbury Development Strategy, and remain satisfied that it will still be possible to meet the identified housing need within the Plan period. I can thus find no reason to depart from this Strategy solely on the grounds that land is immediately available for development. Indeed, I have no doubt that the same argument could be advanced in respect of countless similar sites throughout the District.
- 6.23.8 With regards to the larger of the two sites, development in this location would represent a significant extension into open countryside, with the most tenuous of links to the existing built-up area. Furthermore, parts of the site lie within the River Thames flood plain where, in accordance with GP.90 as recommended to be modified, development will be severely restricted. Allocation of the site would thus result in a contrived pattern of development extending into open countryside, poorly related to the town. Development in this location would also be constrained by the protected line of the NLR if, contrary to my recommendation, it is retained.
- 6.23.9 Finally, both objection sites lie within, or partly within, an area identified on the Proposals Map as a Strategic Gap, subject to policies RA.2 and RA.3. The Council propose (by means of PC 10.04) that these be renamed Green Gaps, and I deal with objections to the principle of these Gaps in Part 2 of my report. Notwithstanding my pending conclusions on the Gaps issue, in the absence of over-riding need to allocate the site(s), development in this location would constitute edge of town greenfield development which, if permitted, would result in the piecemeal erosion of the open countryside surrounding the town, and thereby conflict with Plan policy and Government advice to protect the countryside for its own sake.

Recommendation:

- 6.23.10 I recommend that no modification be made in response to these objections.

6.24 CP127 Weedon Hill, Aylesbury

Objector:

DD2599 Hallam Land Management Ltd

Principal Issues:

- 6.24.1 Whether the proposed Weedon Hill MDA should be extended northwards to include land alongside the Quarrendon SAM and an extended park and ride / employment site.
- 6.24.2 Whether the proposed MDA should include an element of employment land.
- 6.24.3 Whether the WLR should be realigned further north.

Inspector's Considerations and Conclusions:

- 6.24.4 Arising from my consideration of submissions concerning the General Location of Development, I have recommended that 65% of housing and employment development proposed during the Plan period be located in Aylesbury, with provision for the remaining 35% in the Rural Areas (policy ST.1 as recommended to be modified). My consideration of submissions concerning the AVDLP Housing Requirement has enabled me to identify the need for some 4500 dwellings during the period 2001-2011, of which some 3550 need to be provided in the Aylesbury urban area, with the remaining 950 in the Rural Areas (Table 2 as recommended to be modified).
- 6.24.5 My consideration of submissions concerning the Aylesbury Development Strategy has led me to conclude that of the 3550 dwellings required during the Plan period, some 850 will be provided on brownfield sites, with the remaining 2700 being built on allocated greenfield sites. Furthermore, my consideration of detailed submissions concerning the three mixed use MDAs has led me to conclude that the Berryfields and Weedon Hill MDAs are acceptable, but that the Broughton Stocklake MDA should be deleted. Specifically I have concluded that some 1850 (out of a planned total of 3000) dwellings will be built at Berryfields, with a further 850 at Weedon Hill (Table 3 as recommended to be modified).
- 6.24.6 Accordingly I am satisfied that Aylesbury's housing requirements for the period to 2011 can be met on identified brownfield and allocated greenfield sites. It thus follows that there is no need for me to recommend the allocation of any additional or alternative land for housing development or, in principle, to express support for any modification which may result in an increase in the amount of land allocated for development. Hence I must consider the objector's submissions in the context of my earlier identification of sufficient land on suitable sites in Aylesbury to meet the requirements of the Plan.
- 6.24.7 The objectors suggest that the bulk of the additional land that would be included in the MDA by realigning the northern boundary would be set aside for open amenity and sports pitch uses associated with development on the remainder of the site. This would, in turn, afford an opportunity for lower net housing densities, provide an opportunity for some employment land within the MDA and provide a better urban design, while avoiding intrusive skyline development.
- 6.24.8 I am satisfied that the use of the additional land for open uses would not have an adverse affect on the setting or integrity of the adjacent Quarrendon SAM. However, in my view the inclusion of additional land is unnecessary. I have earlier concluded, in response to objections to AY.16, that the allocated MDA site is of sufficient size to contain the proposed 850 dwellings and associated facilities, including landscaping, and that the net density of some 39 dwellings per ha accords with PPG3 advice. I can see no reason why it should not be possible to produce a range of interesting and varied layouts throughout the MDA within the 30-50 dwellings per ha density parameters established in PPG3. Neither am I persuaded that the inclusion of additional land will necessarily result in an overall improvement in urban design.

- 6.24.9 Likewise it is, in my view, neither necessary nor desirable to include an element of employment land within the MDA. Provision has been made for employment uses elsewhere, specifically within the Berryfields MDA and at the Aston Clinton Road MDA; the latter possibly incorporating all or part of that displaced by my recommended deletion of the Broughton Stocklake MDA. I am satisfied that these provide sufficient land for projected employment growth during the Plan period and, in particular, being off the A41(T), are strategically better located for employment purposes than the Weedon Hill MDA. The provision of additional employment land at Weedon Hill could thus undermine the investment potential of the identified sites, and thereby prejudice the employment strategy in the Plan.
- 6.24.10 I turn now to that part of the objection concerning the alignment of the WLR.
- 6.24.11 The objectors maintain that the optimum alignment of the WLR has not been found. Specifically the alignment shown on the Proposals Map would adversely affect the Quarrendon SAM, would be intrusive in the local landscape, and would result in unnecessary severance within the MDA. These adverse impacts would be exacerbated by the anticipated high level of traffic using the road and by associated lighting columns and other paraphernalia. It is suggested that these problems could be mitigated by realigning the road further north to form the western part of the northern boundary of the extended MDA, and to provide access to the park and ride site and suggested employment land, before joining the A413 approximately at the point shown on the Proposals Map.
- 6.24.12 While it is important to ensure that the Proposals Map is as accurate as possible, it must be recognised that the alignment of proposed roads remains somewhat diagrammatic pending detailed site surveys and the preparation of construction details. Furthermore, as I have earlier noted in response to objections to AY.15 and AY.16, the proposed WLR is to be realigned in accordance with FPC 0.06, principally to give greater protection to the Quarrendon SAM. The line of the easternmost stretch of the proposed route has thus not yet been agreed. It is possible that it will enter the MDA at a different point and follow an alternative route through the site to that shown on the Proposals Map before joining the A413, possibly in the vicinity of the junction shown, or alternatively further south.
- 6.24.13 I am satisfied that the revised route will not have an unduly adverse impact on the SAM. On-the-other-hand, I share the objector's concern regarding the potential impact of the route shown on the Proposals Map on the local landscape, particularly where it cuts through the ridge immediately north of the site. It will not be possible to say whether the re-alignment of the WLR will ameliorate this situation until such time as the line of the eastern section of the proposed road has finally been agreed. While the objector's suggested alignment would have significantly less impact on the local landscape, it would logically necessitate the inclusion of additional land within the MDA that I have rejected in principle above. However, and of particular concern, realignment of the WLR to the north would militate against its use of as a PPTC. In order to maximise its effectiveness, the PPTC should be accessible to the greatest number of dwellings (400m has been suggested as the maximum distance most people are prepared to walk to a bus route), and should therefore preferably pass through the heart of the MDA.
- 6.24.14 It is evident that it is necessary in this case for a balance to be struck between landscape impact and the optimum performance of the route as a PPTC. This is, in my view, too detailed an issue to be determined as part of the Local Plan process, as it will be influenced by the proposed layout of the site, potential visual impact, landscaping, traffic

flow and other considerations. The final alignment should thus be determined by means of separate study and analysis, and the conclusion indicated in the planning brief.

- 6.24.15 I have earlier recommended in response to objections to AY.16 that the Proposals Map be modified to show the revised alignment of the WLR in accordance with FPC 0.06 and as finally agreed. There is no need for me to reiterate that recommendation.

Recommendation:

- 6.24.16 I recommend that no modification be made in response to this objection.