

# AYLESBURY VALE DISTRICT COUNCIL

## Planning

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Our Ref: 03/04/Neighbourhood Planning/Wendover



12 August 2019

Sent by email to [planningpolicy@aylesburyvaledc.gov.uk](mailto:planningpolicy@aylesburyvaledc.gov.uk)

Dear the neighbourhood plan examiner,

### **Re: Wendover Neighbourhood Development Plan –Submission (Regulation 16)**

This letter sets out AVDC's formal response to the Wendover Neighbourhood Development Plan (WNP) Submission plan. This builds upon the ongoing dialogue between AVDC and the Wendover Parish Council since the plan started to be developed. The table overleaf set out comments for each part of the plan.

The WNP provides policy direction for how the community wish to see Wendover develop to 2033. We commend the Neighbourhood Planning Steering Group on the hard work in getting to this stage and welcome the general approach and direction given in the plan. The queries and suggested changes in these representations are to try to further improve the plan as well as to assist the NP towards fully meeting the basic conditions.

I trust the below points and suggestions are clear but please contact me if you wish to discuss anything.

Yours sincerely



David Broadley  
Senior Planning Officer (Forward Plans)  
Community Fulfilment



**Table 1. comments on the Submission Plan**

<b>Document: Submission Plan</b>		
Page	Para	Comment
7	28	The Vale of Aylesbury Local Plan (VALP) is currently at Submission stage and this would be more accurately reflected by stating 'Submission' instead of 'draft'
22	5.20	The proposed designation is 'Local Green Spaces' rather than just 'Green Spaces' and this should be changed in the penultimate sentence.
33	11.3	The last sentence refers to Conservation Area but it appears the area not included within the settlement boundary is Green Belt land, The text should be amended to address this.
34	Map 4	It appears areas of bank farm should be removed from the proposed settlement boundary to be consistent with the removal of green belt areas.
35	Policy H1	AVDC consider that a few changes are needed to this policy in order to function as intended and have due regard to national policy. The matter of 'pooling' contributions is separate to that of phased developments which are functionally 'major' schemes of 10+ dwellings and as of 1 <sup>st</sup> September the pooling restriction will be removed so reference to this should be removed. The second bullet point duplicates the initial policy wording and should be removed. AVDC invites the examiner to consider whether the circumstances of Wendover Settlement, being enclosed by a designated rural area (the Chilterns AONB), justify the lower threshold of 5 dwellings for development to contribute towards affordable housing and other necessary infrastructure. It is suggested an 'or' is added between the last two bullet points.
35	11.8	'and create a sense of space.' It is difficult for new building to do this, so this should be reworded to make clear that it is about creating spaces or making sure appropriate spacing, depending on the character of the area. Some areas will be more densely packed which is part of their character/significance

36	Policy H2	The initial wording is currently muddled and would be clearer reading ' Development Proposals in the Conservation Area will be supported where it conserves and/or enhances the character and appearance of the Conservation Area, <b>including its setting...</b> ' OR 'it conserves and/or enhances the significance of any heritage asset, <b>including its setting, this includes</b> the character and appearance of the Conservation Area as well as any other heritage assets....'
36	Policy H3	The first sentence does not add any policy direction or frame the following bullet points so should be replaced with a positive policy statement. The first bullet point might be more appropriately set out as a Rural Exception Sites policy in line with the NPPF. The second bullet point duplicates VALP and therefore is unnecessary. The final bullet point will also be covered by provisions in VALP. If it is to be retained this point should be based on a proportion of units.
37	Policy SD1	The Policy as currently worded could be interpreted to be overly positive towards otherwise unacceptable development outside the proposed settlement boundary. It is suggested that the wording could cross refer to Policies H1 & H3, removing 'all' . The second bullet point would be clearer if it read 'it conserves and/or enhances the significance of any heritage asset and/or the special interest, character and appearance of the assets <b>including</b> their settings.' The penultimate bullet point should be weakened i.e to 'severely adverse' or 'unacceptably impact neighbouring properties'. The final bullet point should be removed as it duplicates other elements of the policy and the use of 'must' in this context is inappropriate.
38	Policy SD2	This policy would read better as 'Parking required for development in the neighbourhood area will be supported provided that;'
39	Policy B1	The requirement for there to be alternative facilities is not a proportionate requirement, the demand for facilities should be sufficiently reflected in the marketing. The second bullet point relating to heritage duplicates others within the proposed plan and VALP and should be removed.
40	Policy CF1	As supporting the provision of facilities is the aim this could be better reflected by replacing 'development' with 'provision'. As above the requirement for alternative local facilities is considered to be excessive. The 'community'

		benefits are already considered within the planning balance of the 'public benefits' of proposals so this point does not appear to add to the policy consideration in the absence of a workable definition of 'community benefits'.
42	Map 5	All areas covered by the policy should be shown with exact polygons (eg Allotments). It may be clearer to have a larger landscape map.
43	Policy CH1	It is considered that the policy should be conditioned 'where feasible' and that 'must' should be replaced by 'should' in order to be proportionate. The use of 'any' is also unnecessarily broad and should be removed.
44	Policy G1	There is an error in the reference to Map 5 as it should refer to Map 6.
46	11.29 / Map 7	All views to be covered by the policy need to be clearly identified and shown on the associated policy map(s) where justified, the current wording is too vague and general.
46	Policy G2	The protection of 'key views' sought by the policy is too generalised in referring to where 'development is on the edge of the settlement, adjacent to open landscape' The wording should instead focus on the protection and enhancement of the key views and vistas, perhaps by moving this to the front of the policy. There is currently insufficient clarity and justification within the NP on the non Conservation Area Appraisal views and vistas.
46	11.30	This paragraph could be focus more closely on biodiversity issues rather than social / general environmental aspects.
47	Policy G3	The first bullet point should remove reference to 'no net loss' and identify a requirement of a net gain of at least 10% in line with National policy expectations.
48	Policy IC1	It would be clearer to include 'telecommunication' before 'structures' in the second bullet point.