



Vale of Aylesbury Local Plan Summary of Regulation 19 Representations

The Response

988 responses were received, comprising 2441 comments. Of the original responses 658 (67%) were made via the online consultation system, 262 (26%) were submitted via email and 68 (7%) were posted paper responses.

Summary of the Main Issues Identified

This section summarises the main issues raised at the proposed submission publication stage. It is not intended to be a definitive list of all representations received; it is a broad summary of the main issues raised (in accordance with Regulation 22(1)(c)(v)).

The main issues raised are summarised below. For each policy or supporting text the total number of representations are identified, which is then broken down into how many representors supported or objected to the plan.

1. Chapter 1: Background

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|-----------------------------------|------------|
| Total number of Comments received | 176 |
| Objected | 138 |
| Supported | 38 |

Main issues:

- SA - The SA for the VALP fails to appropriately consider alternatives, alternatives suggested include looking at a smaller scale of growth for Aston Clinton, looking at NLV001 combined with NLV020, a variation with some growth at edge of MK and reduced amounts at strategic settlements and options relating to higher levels of growth.
- HEDNA - There are a number of comments on the HEDNA some in support but more in objection, relating also to the comments made on S2. Comparison is made between older versions of the HEDNA and the newer ones where the OAN has reduced.
- The plan fails to recognise the Oxford to Cambridge growth corridor and the NIC work done in relation to this. The Government's proposed standardised method to calculating the OAN is commented on too. It is suggested that additional provision for housing should be made in the context of these two issues.
- Unmet need - There is support for unmet need being provided for in Aylesbury Vale but also comments saying further work should be done to find more capacity in the southern bucks authorities – suggestions include increasing density, more capacity at Princes Risborough, further additional sites. Concerns have also been raised that in the future there is likely to be additional need identified for Aylesbury Vale through the issues mentioned above may mean the unmet need can't then be met.

- DTC - There is little evidence of cooperation with councils to the north of the district, particularly Milton Keynes, specifically concerning the proposed spatial distribution and allocation at the edge of Milton Keynes, provision of a bypass, and the East to West rail link. The Buckinghamshire authorities have not cooperated enough on employment needs.
- The best fit HMA identified is 'convenient', in reality its more complicated and the needs of the wider region should be looked at.
- It is suggested there should be a additional policy on Canals.
- Reliance on large MDAs being delivered quickly around Aylesbury is optimistic
- Infrastructure – not enough focus on road capacity, footpaths, Stoke Mandeville Hospital, Chiltern railways services, Tring train station, broadband, sewerage
- Neighbourhood planning – further growth at places that have a neighbourhood plan should be decided by the local community through the neighbourhood plan process– e.g. Buckingham and Stoke Mandeville. VALP undermines neighbourhood planning.

2. Chapter 2: Vision and Strategic Objectives

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| Total number of Comments received | 49 |
| Objected | 34 |
| Supported | 15 |

Main issues:

- Spatial vision doesn't mention the growth of Milton Keynes.
- The vision and objectives do not give enough emphasis to the Chilterns AONB.
- There is no policy regarding education that will deliver the vision

3. Chapter 3: Strategic

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|---------------------------------------------------------|-----------|------------|
| Total number of Comments received | | 748 |
| Objected | | 616 |
| Supported | | 132 |
| S1 Sustainable development for Aylesbury Vale | Objected | 54 |
| | Supported | 8 |
| S2 Spatial strategy for growth | Objected | 136 |
| | Supported | 16 |
| S3 Settlement hierarchy and cohesive development | Objected | 44 |
| | Supported | 10 |
| S4 Green Belt | Objected | 14 |
| | Supported | 5 |
| S5 Infrastructure | Objected | 24 |
| | Supported | 6 |
| S6 Gypsy, Traveller and Travelling Showpeople provision | Objected | 13 |
| | Supported | 2 |
| S7 Previously development land | Objected | 10 |
| | Supported | 5 |
| S8 Neighbourhood Plans | Objected | 16 |

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| | Supported | 6 |
| S9 Monitoring and review | Objected | 20 |
| | Supported | 1 |

Mains issues:

Policy S1

- Having such a large amount of growth concentrated around Aylesbury will lead to more traffic problems, this is not sustainable.

Policy S2

HEDNA

- Comments were made questioning the latest assessment of housing need in the HEDNA with comparisons being made to previous assessments which produced a higher OAN, saying it shouldn't be lowered at a time of pressure for increasing housing delivery.
- Most comments made stated the OAN should be higher, with a number of detailed technical reports and comments identifying why.

OAN

- There are also comments suggesting the plan should adopt the Government's proposed OAN methodology now in VALP which would mean 30,000 new houses over the plan period plus 8,000 unmet need, and not leave it until a Local Plan review.
- As it is considered that the OAN is underestimated significant additional allocations should be identified.
- The housing requirement should be expressed as a minimum.
- Concerns have been raised that the plan is proposing too much housing and the impact this will have on wildlife.

Unmet need

- The plan should acknowledge that the 8,000 unmet need is provisional depending on the examination of Wycombe and South Bucks/Chiltern's Local Plan.
- There is a suggestion that unmet needs shouldn't be taken from the part of South Bucks that is outside the functional HMA.
- If the capacity cannot provide for the unmet need on top of such a increase in Aylesbury Vale's own OAN then it is questioned whether the MOU is useless.
- Comments made that Aylesbury Vale should take some of Luton's unmet needs.
- There is a objection to taking any unmet needs and the suggestion the acceptance of this should be delayed
- The housing need should be met closest to where it arises. Only the southern part of Aylesbury Vale is well related.

Spatial Strategy

- Comments have welcomed the move away from the percentage approach to distributing growth that was previously proposed.
- There is some support for the settlements which are identified as strategic settlements and therefore have been allocated for the largest levels of growth.
- There are also comments made suggesting different spatial strategies, with the majority suggesting a new town should be allocated along the east to west rail/expressway links, there are other suggested locations for a new town including

Halton, Waldridge Garden Village to the east of Haddenham. Land to the north of Winslow and Land at Calvert are two specific locations suggested for new settlements along the east to west line.

- In terms of the new settlement option some suggest this in addition to existing allocations and some instead of so much growth at Aylesbury or other existing settlements.
- There are also the suggestions of various other amendments to the distribution of growth including that there should be more growth on the edge of Milton Keynes instead of Aylesbury or Buckingham, more growth at Haddenham, more growth at Buckingham, both the more and less growth at Aylesbury, both more and less growth at RAF Halton.
- Objections were raised to the amount of housing around Aylesbury and the impact this would have on its character, the AONB, coalescence with surrounding villages, the roads and other infrastructure. Concern is raised that there isn't enough employment in the town for these houses. If this amount of housing is proposed at Aylesbury a full ring road is needed.
- There is a concern that the transport effects of Aylesbury Garden Town haven't been considered alongside the growth at Wendover and Princes Risborough or other impacts from outside the district.
- Objections to the allocation of sites in Buckingham and Winslow above the amount of growth set out in the neighbourhood plans and comments that the location of further growth should be decided by a review of neighbourhood plans.
- Suggestion there should be more growth at Aylesbury and Buckingham
- Concerns about coalescence between Halton and Wendover and the impact on infrastructure.
- Comments are made that Halton should be treated separately to Wendover and just as a smaller village. There is also support them to be considered together as the growth will impact on both settlements.
- Objections to the amount of growth proposed at Maids Moreton, which is higher than growth proposed at the other medium villages.
- Suggestions that Brill and Marsworth should be classed as smaller villages
- Surplus and vacant existing employment sites can be released for allocation of housing rather than so much greenfield land.
- A number of additional sites were put forward for allocation, mainly for housing sites, including (but not exclusively):
 - Land at Buckingham Road, Winslow - Crevichon Properties Ltd 31845
 - NLV020 (SWMK phase 2) - SWMKC 32287
 - Number of sites to the south west of Milton Keynes - Marrons planning 29372
 - CAL003 - FCC Environment 32265
 - Marsworth Airfield - Ainscough Strategic Land 32319
 - Land at Gawcott -The University of Buckingham 31844
 - Land south of Gawcott – Mr T Annable 32241
 - Waldridge Garden Village to the east of Haddenham - Waldridge Garden Village Consortium 32314
 - Greenway Project, Land north of Winslow - Amarillo Ltd & Scandale Ltd 32109

- Berryfields, East Aylesbury - Arnold White Estates 32001
- North of Waddesdon - Arnold White Estates 32001
- BUC054 – Ms M Ortegon 32163
- NMA002 - RPS Group 32157
- Land north of Aylesbury Road/South of the A41 - GRE Assets - 32260
- NLV029 - FCC environment 32265
- Land adjacent to College Road South, Aston Clinton - Vanderbilt Strategic 32272
- Land East of Fenny Road, Stoke Hammond - September Properties 32277
- HAD002 - Richborough Estates 32286
- GHW013 - Taylor Wimpey South Midlands 32254
- Eaton Leys, Milton Keynes - Gallagher Estates Ltd 32326
- Finmere airfield - Corbally (Finmere) Group and Mrs Vanessa Tait 32293
- Haddenham Airfield, Haddenham - Lands Improvement Holdings (LIH) 32300
- Land South West of Weston Turville - Bellway Homes 32302
- Site adjacent Leighton-Linslade - Paul Newman New Homes 32292
- BIE027 and GUW008 - CALA Homes Limited 32297
- Stoke Mandeville sites - Manor Oak Homes 29966
- Land at Winslow Road, Wingrave- Careys New Homes 32267
- Land at Calvert Green - Persimmon Homes Midlands 32264
- Land at Cheddington - Society of Merchant Ventures 32202
- Land West of Canal and south of Halton Lane, Wendover - Manlet Group Holdings 32324
- Land north of Aylesbury Road, Wendover - CEG 32243
- AYL087 – Aviva Life & Pensions 32283
- Brook Farm, Broughton - Land at Brook Farm 32131
- Fleet Marston, Aylesbury - Barwood Land and Estates 32310
- Additional land at Rabans Lane, Aylesbury - Aylesbury Vale Estates LLP 32240
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Delivery

- It was suggested that the plan needs greater flexibility/contingency.
- Comments were made about the delivery rates, particularly about large strategic sites not being able to deliver as needed with suggestions that there is an over reliance on these. It was suggested that more smaller sites should allocated in the larger and medium villages.
- Comments were made on whether Aylesbury can deliver such high levels of housing and whether market saturation will be reached.
- It was suggested that there needs to be a higher allowance for non-implementation than the 5.2% buffer currently proposed.
- The use of reserve sites was suggested
- It was stated that VALP doesn't deliver a robust 5 year housing land supply against VALP's housing requirements

Employment

- There is a lack of justification for Aylesbury Vale meeting the unmet employment needs of the southern Bucks authorities, Aylesbury Vale has poor connectivity and is unlikely to meet B8 requirements and sites delivered.

- The site selection and SA process is flawed.
- Comment that the employment provision should be higher for the amount of housing.

Other

- Preparation of the Charging Schedule should be undertaken alongside the VALP as the two documents will directly influence the deliverability and sustainability of one another
- The Sustainability Appraisal of the VALP, states that a more dispersed approach was examined but no further detail is provided within the SA, this should have been examined as a alternative option.
- There needs to be up to date flood modelling for sites WTV018, BIE022 and STO016 to satisfy that the sites can accommodate the proposed amount of development.
- Milton Keynes should be recognised as a strategic settlement in the settlement hierarchy, otherwise its role is undermined.

Policy S3

- A number of comments state that the Aylesbury Vale District Council does not adhere to its own policy, as the planned developments at Halton, Hampden Fields, Stoke Mandeville and BUC043 in Buckingham lead to coalescence and the diminishing of settlement identities and are therefore contrary to this policy.
- Comments have been made stating that the commitment to the preservation of the character and identities of settlements and the prevention of coalescence is important, but the wording in the supporting paragraph 3.22 is too weak to ensure this.
- Comments have stated that the proposed hierarchy is considered the appropriate way to deliver housing requirements.
- Comments have been made stating that there is an over-reliance on a small number of development locations to achieve housing targets.
- Comments request that additional development should be allocated to the identified Large and Medium villages.
- A comment requesting a third criterion to prevent development that would harm the Chilterns Area Of Outstanding Natural Beauty or its setting.
- One comment requested for settlement boundaries to be defined .
- Comments requested the housing requirement to be expressed as a minimum figure.
- Comments state that the wording of Policy S3 is too restrictive, which will prevent the delivery of necessary levels of development.

Policy S4

- Objections to the removal of land from the Green Belt at Halton. It isn't considered any less important that the Green Belt in Southern Bucks and should be kept to preserve the AONB. That the site is already developed is not justification to remove it from the Green Belt. Any redevelopment should not reduce its openness.
- There are also objections to the allocation of housing at RAF Halton if it's still within the Green Belt.
- Support for the removal of land from the Green Belt to the north of Wendover no longer being proposed
- Support for the extension of the Green Belt to the west of Leighton Linlade and also objection to this based on the failure to demonstrate exceptional circumstances.

Policy S5

- There is concern that sufficient infrastructure will not be delivered in reality. Specific mention is given to infrastructure to support RAF Halton allocation and the funding/delivery of the link roads around Aylesbury, roads infrastructure in rural areas
- The existing infrastructure is already under strain, it is important that the necessary infrastructure is delivered up front or early in the provision of new development. The wording on this should be strengthened.
- Concern is raised that this policy is looking to address existing deficiencies, it should only be sought where they are necessary to make the development acceptable.
- More detail is required about the infrastructure that is needed
- Where larger sites are under different land ownerships the delivery of infrastructure needs to be ensured by having the appropriate mechanisms in place.
- There should be more recognition about East to West Rail and Oxford to Cambridge arc.
- There is also a number of support comments for this policy.

Policy S6

- The policy does not mention the requirement to monitor Gypsy and Travellers or have an enforcement plan
- Objections have been made to the allocation of Oakview, Boarstall. This has been recently refused permission, there is an over supply of sites in the area, it is close to the MOD sites and prison, the site has a dominant and unnatural impact on the open countryside and would have a detrimental impact on the area, overlooks residential properties, has poor access to services and it doesn't meet the criteria in D10. The site does not appear to have a sewerage connection, groundwater aquifers would need to be protected from pollution if it does need disposal set up.
- Allocations should only be made for those that meet the definition, not those that are unknown, reducing the amount of allocations needed to just existing sites that meet the criteria of policy D10.

Policy S7

- Five comments were supportive of Policy S7 and 10 were objections.
- One comment stated that the wording of Policy S7 was problematic as 'previously developed land' can be ambiguous.
- One comment requested a caveat in Policy S7 regarding the impact development has on local character.
- Comments have stated their support of Policy S7, but have also noted that it is important the policy is not read such as to prioritise previously developed land over green field land for development.

Policy S8

- Comments were made stating that the allocation of specific sites in Neighbourhood Plan Areas prejudices the Neighbourhood Plan process, and that S8 needs to ensure that neighbourhood plans are the principal vehicle by which allocations are made.
- Comments requested for Policy 8 to include a requirement for Neighbourhood Plans to be reviewed to ensure that they contribute towards the strategic policies of the VALP.

- Made comments stated that Policy S8 is not clear as to what weight Neighbourhood Plans are to be given in the planning process and what the relationship between VALP and existing Neighbourhood Plans is.
- Policy S8 has received comments supporting it on the basis that it reinforces the need for Neighbourhood Plans, and that it recognises that Neighbourhood Plans should be in general conformity with the strategic policies of VALP.

Policy S9

- The FOAN should be higher meaning that delivery has persistently below the requirement and a 20% buffer should be used to calculate the 5 year supply. A 5 year supply can then not be demonstrated and more sites should be allocated. With the proposed FOAN and unmet needs there is still a shortfall since the beginning of the plan period of 638 dwellings and persistent under delivery.
- It should be ensured that the allocations are deliverable within the expected time period and enough have been allocated.
- The delivery rates are ambitious and a significant increase, therefore a greater buffer should be used with further allocations to allow for flexibility.
- The windfall allowance should include larger sites than 4 dwellings too and therefore would be a higher number than 962.
- Two comments stated that Policy S9 should include a schedule of reserve sites to be released if monitoring indicates a shortfall in the five year housing land supply position.
- Comments requested for Policy S9 to specify that the Plan will undergo an early review.
- A number of comments were made on specific issues on specific sites.
- Comments were made supporting references to settlement's historic environments in site allocation's supporting paragraphs.

4. Chapter 4: Strategic Delivery

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| Total number of Comments received | | 946 |
| Objected | | 845 |
| Supported | | 101 |
| D1 Delivering Aylesbury Garden Town | Objected | 55 |
| | Supported | 8 |
| D-AGT1 South Aylesbury | Objected | 43 |
| | Supported | 1 |
| D-AGT2 South West Aylesbury | Objected | 20 |
| | Supported | 0 |
| D-AGT3 Aylesbury North of A41 | Objected | 45 |
| | Supported | 7 |
| D-AGT4 Aylesbury South of A41 | Objected | 42 |
| | Supported | 4 |
| D-AGT5 Berryfields | Objected | 4 |
| | Supported | 1 |
| D-AGT6 Kingsbrook | Objected | 7 |
| | Supported | 1 |
| D-AYL032 Ardenham Lane Aylesbury | Objected | 2 |

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| | Supported | 0 |
| D-AYL073 Land at Thame Road/Leach Road, Aylesbury | Objected | 2 |
| | Supported | 1 |
| D-AYL052 PO Sorting Office, Cambridge Street, Aylesbury | Objected | 1 |
| | Supported | 0 |
| D-AYL059 Land at junction of Buckingham Street and New Street, Aylesbury | Objected | 2 |
| | Supported | 0 |
| D-AYL077 Oaklands Hostel, 3 Bierton Road, Aylesbury | Objected | 0 |
| | Supported | 1 |
| D-AYL063 Hampden House, Aylesbury | Objected | 2 |
| | Supported | 0 |
| D-AYL068 Land North of Manor Hospital, Bierton Road, Aylesbury | Objected | 0 |
| | Supported | 2 |
| D-AYL115 Rabans Lane, Aylesbury | Objected | 4 |
| | Supported | 0 |
| D-NLV001 Salden Chase | Objected | 17 |
| | Supported | 0 |
| D2 Proposals for non-allocated sites at strategic settlements, larger villages & medium villages | Objected | 43 |
| | Supported | 3 |
| D-BUC043 Land West of AVDLP allocation BU1 Moreton Road, Buckingham | Objected | 16 |
| | Supported | 1 |
| D-BUC051 West Buckingham, Land bound by Brackley Road and the River Great Ouse | Objected | 8 |
| | Supported | 1 |
| D-BUC046 Land off Osier Way (South of A421 and East of Gawcott Road) | Objected | 13 |
| | Supported | 0 |
| D-HAD007 Land North of Rosemary Lane | Objected | 12 |
| | Supported | 2 |
| D-HAL003 RAF Halton | Objected | 70 |
| | Supported | 5 |
| D-WIN001 Land to East of B4033, Great Horwood Road | Objected | 19 |
| | Supported | 0 |
| D-SCD003 Land at Queen Catherine Road | Objected | 2 |
| | Supported | 0 |
| D-SCD008 Land at Molly's Folly/Molly's Field, West of Addison Road | Objected | 2 |
| | Supported | 0 |
| D-STO008 Land South of Creslow Way, Stone | Objected | 1 |
| | Supported | 1 |
| D-WHI009 Holt's Field, Whitchurch | Objected | 2 |
| | Supported | 1 |
| D-CDN001 Land North of Aylesbury Road and rear of Great Stone House | Objected | 3 |
| | Supported | 1 |
| D-CDN003 Dadbrook Farm | Objected | 2 |
| | Supported | 2 |
| D-ICK004 Land off Turnfields | Objected | 2 |
| | Supported | 1 |
| D-MMO006 Land East of Walnut Drive and West of | Objected | 72 |

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| Foscote Road | Supported | 1 |
| D-MGB003 Leopold Farm and area to the West | Objected | 1 |
| | Supported | 3 |
| D-NLV005 Land South of Whaddon Road and West of Lower Road, Newton Longville | Objected | 3 |
| | Supported | 0 |
| D-QUA001 Land South West of 62 Station Road | Objected | 0 |
| | Supported | 1 |
| D-QUA0014-016 Land adjacent to Station Road, Quainton | Objected | 0 |
| | Supported | 1 |
| D3 Housing development at smaller villages | Objected | 10 |
| | Supported | 9 |
| D4 Housing at other settlements | Objected | 4 |
| | Supported | 2 |
| D5 Provision of employment land | Objected | 6 |
| | Supported | 1 |
| D6 Town, village and local centres to support new and existing communities | Objected | 4 |
| | Supported | 0 |
| D7 Town centre redevelopment | Objected | 5 |
| | Supported | 0 |
| D8 Aylesbury town centre | Objected | 2 |
| | Supported | 1 |
| D9 Housing in Aylesbury town centre | Objected | 1 |
| | Supported | 0 |
| D10 Gypsy, Traveller and Travelling Showpeople sites | Objected | 5 |
| | Supported | 0 |

Mains issues:

Policy D1

- Too much reliance on housing delivery at Aylesbury and the deliverability of this is questioned
- Support for identification of Aylesbury as a Garden Town (GT) and Aylesbury playing a substantial role in housing delivery
- Strategic allocations focus on housing and more employment land should be provided
- It is suggested that the town centre policies need to better reflect the town centre plan
- Capacity of town centre in traffic/parking terms questioned
- Several respondents express concern about the adequacy of transport infrastructure and state that the Aylesbury Transport Strategy is flawed as it is based on flawed modelling. Orbital roads are unlikely to move traffic away from the town centre and it is recognised that some of the orbital roads are aspirational
- Suggestions received regarding individual road improvements that are required including the completion of the Wendover bypass
- Support for recognition of the Aylesbury Arm of the Grand Union Canal and the emphasis given to green infrastructure and recognition of the importance of the historic environment

- In relation to policy D1, there are a number of objections to the high level of growth , particularly to the south of Aylesbury as it cannot be accommodated in a sustainable way or in a way that meets garden town principles
- Conversely, it is also suggested (by a much lower number of respondents) that the level of growth planned for Aylesbury is too low
- It is suggested that the design principles for Aylesbury GT should apply to all developments
- The deliverability of the allocations for Aylesbury should be fully assessed
- A number of alternative sites at Aylesbury were put forward (the counter proposal sites are listed under the summary for policy S2)
- Supplementary Planning Documents (SPDs) for individual sites are not necessary
- There is support for the principles set out in D1

Aylesbury Garden Town Allocations

- In relation to D-AGT1 (South Aylesbury) a number of specific suggestions were made to amend the policy. There is concern about the allocation in terms of transport impacts, coalescence, infrastructure provision and impact on neighbouring settlements
- In relation to D-AGT2 (South west Aylesbury) a number of specific suggestions were made to amend the policy. There is concern about the allocation in terms of the impact of Hs2, the transport implications, impact on Hartwell House and impact on surrounding villages
- In relation to D-AGT3 (Aylesbury north of A41) a number of specific suggestions were made to amend the policy. There is concern about the allocation in terms of transport implications, flooding impact, impact on surrounding villages, cumulative impact with other developments around Aylesbury and whether the homes can be delivered at the rate assumed
- In relation to D-AGT4 (Aylesbury south of A41) a number of specific suggestions were made to amend the policy. There is concern about the allocation in terms of transport implications, flooding impacts, coalescence, whether the site can deliver at the rate predicted, cumulative impact with the other developments around Aylesbury and the impact on the identity of surrounding villages
- In relation to D-AGT5 (Berryfields) it was questioned whether the assumed delivery rates are realistic
- In relation to D-AGT6 (Kingsbrook) a number of specific suggestions were made to amend the policy

D-AYL032

- Water infrastructure will not support development
- Listed building should be recognised in the policy

D-AYL073

- Site unsuitable due to proximity to rail infrastructure/depot
- Implications for adjacent watercourse are not properly addressed
- No significant impact on water infrastructure expected

D-AYL052

- Possible significant impact on water infrastructure

D-AYL059

- Possible significant impact on water infrastructure
- Heritage assessment should inform proposals

D-AYL077

- No significant impact on water infrastructure expected

D-AYL063

- Possible significant impact on water infrastructure
- Delivery of site is unlikely

D-AYL068

- No significant impact on water infrastructure expected
- Welcome reference to heritage
- Site should be kept for employment

D-AYL115

- Possible significant impact on water infrastructure
- Delivery of site is unlikely
- Additional land should be considered for allocation
- Criteria in policy are overly onerous

D-NLV001

- Minor amendments needed to reflect planning consent
- Shenley Park should not have been found suitable or be referred to in the plan
- More land nearby should be allocated for housing including NLV020
- Ribbon rather than estate development should be developed.
- Traffic impact on minor roads has not been properly assessed or mitigated
- Expressway means this site should wait for a decision on the route
- Allocation does not reflect the spatial strategy, will benefit MK not AVDC and is not positively prepared or justified
- Impact on grammar school should be assessed
- Impact on infrastructure not properly assessed
- Site correctly reflects long term expectation of development in this area
- Further clarity required in relation to heritage
- Must pay more attention to long term plan for MK
- Green buffer to existing housing must be included
- Effect on BMV should be taken into account

Policy D2

- Requests for a greater level of flexibility in the wording of policy D2. The policy is too restrictive to allow for delivery of housing outside the allocated sites.
- The HELAA has not been objectively assessed and is unreliable.
- Policy D2 allows Neighbourhood Plans to determine settlement boundaries without taking into account the local plan housing targets.
- The addition of new, practical criteria specifying where development would be considered acceptable.
- Support for policy D2 on grounds that it enhances historic environments.
- Suggestions for the omission and inclusion of specific sites for housing allocation in VALP.

D-BUC043

- BUC043 – In allocating 170 homes at Maids Moreton plus 130 homes on this site at Buckingham this will put local infrastructure under strain. More services, schools and shops are needed
- Instead of building at BUC043 is to build near the M1 corridor and near Milton Keynes

- The Buckingham Neighbourhood Plan is being ignored
- In terms of sites around Buckingham, Anglian Water expect that surface water should only be discharged to the public sewer in exceptional circumstances
- For all sites at Buckingham , an assessment of sewerage capacity and water resources and water supply will be required in consultation with Anglian Water
- The start of completions on site BUC043 is 2021/22 in the VALP soundness document but this is different in the VALP itself.

D-BUC051

- The viability of site BUC051 must be in doubt in view of constraints and infrastructure requirements
- Site BUC051 should preserve as much of the best and more versatile agricultural land as possible and give consideration to restoring and recreating priority habitats

D-BUC046

- Developing site BUC046 would be contrary to the Buckingham Neighbourhood Plan and it is doubtful that the first completions will occur in 2021/22

D-HAD007

- Site HAD007: A dedicated road, pedestrian and cycle link is needed to the railway station to aggravate existing parking problems near the station
- The northern site boundary of HAD007 has been changed since the 2016 HELAA and it is unclear how the site boundary will fit into the setting of the village and affect the Haddenham Conservation Area
- It is unclear how with regard to site HAD007 the Council has worked with stakeholders on school capacity issues and how the housing allocation is deliverable with the obligations placed on it

D-HAL003

- The sustainability credentials of Wendover are in dispute
- At RAF Halton, the site for 1000 homes must not lead to a reduction in openness of the green belt, must provide a high quality landscaping scheme and not adversely affect the Chiltern AONB or create coalescence with Wendover
- RAF Halton's redevelopment is uncertain and is unsuitable based on the sustainability appraisal. There is also a lack of detail in the plan about the proposals and their consequences.
- The road links around RAF Halton are inadequate to cater for an additional 1000 homes
- Concern that development of 1000 homes at RAF Halton will set a precedent for a greater quantity of homes as the 1000 is only an initial figure – the commitment made in the VALP is open-ended.
- Objections to HAL003 being allocated due to inclusion of part of the Listed Halton House, adverse impacts on the amenity of existing residents and also deliverability in that the site will not be available until 2022
- Residential development of 1000 homes at RAF Halton is likely to cause an adverse impact on SSSIs, Local Wildlife Sites and Ancient Woodland which are either nearby, adjacent or within the settlement boundary
- It is concerning that that over 90% of the district is not green belt and so is RAF Halton being conserved with so many alternative brownfield sites in the district
- Jacobs Phase 3 Transport modelling shows severe increases of traffic without the development at RAF Halton

D-WIN001

- The site allocated WIN001 is contrary to the Winslow Neighbourhood Plan and there has been inadequate consultation with Winslow Town Council about a site outside the made Winslow Neighbourhood Plan.
- Doubt as the delivery of dwellings before 2022 on site WIN001 given site constraints, infrastructure improvements and the absence of a planning application

D-SCD003

- The addition of a site criteria stating that any proposal needs to identify Best and Most Versatile agricultural land.

D-SCD008

- The addition of a site criteria stating that any proposal needs to identify Best and Most Versatile agricultural land.

D-MMO006

- A number of made comments objected to the housing allocation D-MMO006 Land East of Walnut Drive and West of Foscombe Road on grounds that it is too big relative to the existing settlement, that local facilities and infrastructure would not be able to support this new growth, that it would cause noise, air and light pollution, and its detrimental impact on the natural environment, the conservation area and the village identity.

Policies D3-D9

- Concern to the blanket restriction on development of more than 5 homes in smaller villages which needs to be made more flexible, provide housing adjacent a strategic employment site and also improve the sustainability of existing communities
- Considerable support for Policy D3 on housing development at smaller villages
- Policy D4 is unnecessarily restrictive and should at least take account of rural exceptions policy and neighbourhood plans
- The plan has not fully considered the opportunities afforded by existing employment allocations/permissions which have not come forward and should be reconsidered for alternative uses. Two such sites are Buckingham Road, Winslow and Gatehouse Industrial Estate, Aylesbury
- The plan is not sufficiently positive about existing employment sites in rural areas such as Finmere and also strategic settlements such as Haddenham Business Park
- There needs to be a positive strategy for the conservation and enjoyment of the Old Town in Aylesbury
- Policy D8 is muddled in that it refers to 'built environment' and 'historic environment' interchangeably this is inconsistent with the NPPF paras 126-157
- More leisure facilities are needed in the central area of Aylesbury such as an ice rink, bowling alley and indoor sports leisure centre
- For D10 a site should only be acceptable where there is no adverse impact at all on the historic environment.

5. Chapter 5: Housing

| | | |
|-----------------------------------|----------|------------|
| Total number of Comments received | | 166 |
| Objected | | 152 |
| Supported | | 14 |
| H1 Affordable Housing | Objected | 55 |

| | | |
|---------------------------------------------|-----------|----|
| | Supported | 1 |
| H2 Rural exception sites | Objected | 6 |
| | Supported | 3 |
| H3 Rural workers dwellings | Objected | 2 |
| | Supported | 0 |
| H4 Replacement dwellings in the countryside | Objected | 1 |
| | Supported | 1 |
| H5 Self/custom build housing | Objected | 11 |
| | Supported | 3 |
| H6 Housing Mix | Objected | 35 |
| | Supported | 0 |
| H7 Dwelling Sizes | Objected | 12 |
| | Supported | 0 |

Mains issues:

- The affordable housing target is too low, with a number of suggestions for higher targets including 30%, 31%, 35% and 40%
- Conversely a (lower) number of respondents suggested that the affordable housing target should be lower
- Several suggestions for modifications to H1 were suggested including amendments to make provision for affordable housing on smaller sites in in AONBs and designated Rural Areas and changes to the site size threshold. Starter Homes should be referred to in Policy H1
- Support for recognition that a proportion of housing to deliver unmet need from elsewhere should be affordable
- Affordable housing should be distributed district-wide, not just on the larger sites in main settlements
- The affordable housing target in the Plan is lower than that in a number of neighbourhood plans and the local plan should not override the higher figures in neighbourhood plans
- Clustering should be applied flexibly
- Suggested that open book financial assessments should not be required as these can contain commercially sensitive information
- The Affordable Housing SPD should have been available for comment at the same time as the Plan
- H1 should clarify how many affordable homes will be delivered
- Rural exception schemes (H2) supported – the council should take a pro-active role
- Suggested that H2 be amended to refer to ‘villages and other settlements’ rather than ‘rural areas’ and that it should include reference to the historic environment. H2 needs to be checked for consistency with references to adverse impacts on environmental assets
- H3 should mention historic environment/heritage assets
- It is suggested that policy requirement in H5 should be informed by entries in the self/custom build register, and that the policy is overly onerous and is not justified by evidence
- Amendments to the H5 are suggested including changes to the threshold and it is suggested that the council should specify a percentage

- There is some support for H5
- It is suggested that H6 is not justified and needs to allow some flexibility with relation to housing mix, that it should be amended to better reflect the nature of the requirement for specialised housing, and that viability should be considered
- It is suggested that the percentages of new homes meeting certain categories should be changed, and subject to viability
- It is pointed out that there is an inconsistency between the definition of larger residential schemes between the policy and the supporting text. It is suggested that the threshold is set too low and that it does not sufficiently allow for local circumstances
- A number of objections were received to H7 for various reasons including lack of evidence and lack of clarity

6. Chapter 6: Economy

| | | |
|---------------------------------------|-----------|-----------|
| Total number of Comments received | | 59 |
| Objected | | 45 |
| Supported | | 14 |
| Table 9 Key employment sites | Objected | 4 |
| | Supported | 0 |
| E1 Protection of key employment sites | Objected | 6 |
| | Supported | 4 |
| E2 Other employment sites | Objected | 6 |
| | Supported | 2 |
| E3 Ancillary uses on employment land | Objected | 1 |
| | Supported | 0 |
| E4 Working at home | Objected | 1 |
| | Supported | 0 |
| E5 Development outside town centres | Objected | 3 |
| | Supported | 0 |
| E6 Shop and business frontages | Objected | 4 |
| | Supported | 0 |
| E7 Tourism development | Objected | 4 |
| | Supported | 0 |
| E8 Tourist accommodation | Objected | 2 |
| | Supported | 0 |
| E9 Agricultural development | Objected | 1 |
| | Supported | 1 |
| E10 Silverstone circuit | Objected | 3 |
| | Supported | 4 |

Main issues:

- There is an apparent mismatch between the amount of new employment land allocated in the Plan and the number of new homes. More employment land should be provided.
- There is support for the approach to protecting key employment sites, including specific mention of a number of the key employment sites.

- However, other respondents give suggestions for sites that should be removed from the list
- Silverstone is supported as a strategic employment site, but other respondents question the reliance on Silverstone due to its lack of connectivity with the south of the district.
- It is suggested that RAF Halton should be assessed for the potential redevelopment as an employment site.
- A number of suggestions for changes to E1 are made including that key employment sites should only be protected if there is viable demand, and subject to other policies in the Plan to recognise impact on the AONB.
- It is suggested that E2 jeopardises the potential for future expansion of certain employment sites, and that the criteria are overly onerous. It is questioned whether there is an error in the wording of the policy and whether it should state that alternative non-employment use is what was actually meant.
- E2 is supported as it recognises that some sites have no prospect of coming forward for employment.
- It is suggested that E3 be more flexible to allow for ancillary uses outside employment sites.
- It is suggested that the sequential test as set out in E5 should not be applied to all non-town centre development including places of worship and community facilities.
- It is suggested that the wording in E5 is confusing and repetitive, and that policies E5, E6 and E7 should include reference to the historic environment.
- It is suggested that E6 does not make the status of the Buckingham Neighbourhood Plan sufficiently clear.
- There are internal inconsistencies between the policies in relation to environmental impacts. Some of the policies refer to avoiding adverse environmental impacts and some do not, including E7, E8 and E9.
- The Silverstone policy is supported recognising its importance for tourism and the economy although it is suggested that it should be amended to make clear distinction between Silverstone Park (MEPC) and Silverstone Circuit (BRDC) and to recognise the importance of the outer orbital link road.

7. Chapter 7: Transport

| | | |
|------------------------------------------------|-----------|------------|
| Total number of Comments received | | 108 |
| Objected | | 92 |
| Supported | | 16 |
| T1 Delivering the sustainable transport vision | Objected | 6 |
| | Supported | 0 |
| T2 Protected transport schemes | Objected | 4 |
| | Supported | 1 |
| T3 Supporting transport schemes | Objected | 5 |
| | Supported | 2 |
| T4 Delivering transport in new development | Objected | 1 |
| | Supported | 2 |
| T5 Vehicle parking | Objected | 10 |
| | Supported | 3 |

| | | |
|------------------------------------|-----------|---|
| T6 Footpaths & cycle routes | Objected | 6 |
| | Supported | 2 |
| T7 Electric vehicle infrastructure | Objected | 7 |
| | Supported | 2 |

Main issues:

General

- The modelling of traffic flows for Aylesbury is seriously flawed and the Aylesbury Transport Strategy has not been assessed properly.
- Impacts on the traffic network have not been properly assessed and necessary mitigation or funding have not been identified.
- There should be a people-orientated transport hierarchy.

Policy T1

- The impact on Wendover from increased properly has not been assessed sufficiently
- A user hierarchy should be established that puts pedestrians and cyclists first
- The policy is not justified and there is no certainty improvements will be delivered.
- The policy should identify how the strategic Link Roads are to be delivered.
- Site NLV020 will deliver transport improvements if allocated.
- OCC has not been mentioned as a delivery partner.

Policy T2

- Cycle improvements resulting from HS2 are not properly described
- Mitigation of HS2 not set out in enough detail
- Plan does not reflect status of HS2 accurately (e.g. Glossary)
- Many respondents stated that the benefits of E W Rail have not properly been taken into account in the plan which should actively capitalise on its benefits such as the location of a new settlement
- Policy should be flexible for development near HS2.
- Policy should require HS2 to minimise land take
- Policy is supported as it delivers essential infrastructure

Policy T3

- Many respondents stated that the benefits of the Expressway have not properly been taken into account in the plan which should actively capitalise on its benefits such as the location of a new settlement
- Not taking proper account of the Expressway means that the plan does not accord with national policy and is not effective
- The Expressway should allow development to be redirected away from the south of the district
- Policy should protect all possible routes of the Expressway to avoid impacts on allocated sites
- The southern Expressway route is strongly opposed because of effects on a significant historic landscape
- The central option should be chosen in VALP
- Policy should recognise Expressway's primacy and allow for alteration of VALP now or in review to accommodate Expressway
- Policy takes the correct approach to the Expressway by proposing an early review to address its impacts

Policy T4

- Does not reflect NPPF re severity of impact
- Policy should refer to the mitigation of effects and set out how negotiations will be undertaken
- Proposed improvement to public transport is welcomed

Policy T5

- All parking should be on plot with none on the road
- Garage sizes should be specified and allow for large cars and storage
- Conversion of garages should not be allowed
- Parking requirements for commercial uses should be restricted to operational requirements
- Priority in parking should be given to disabled persons and local residents
- Parking standards should be set out in the plan not an SPD which will allow viability impacts to be addressed
- Parking outside homes should be restricted to encourage use of other forms of transport
- Parking policy should refer to needs of emergency vehicles
- Parking in Wendover has not been properly addressed
- Available public transport should exclude temporary provision e.g. for supermarkets

Policy T6

- Negative effects on footpaths should be balanced by positive impacts of development
- Policy should refer to ‘unacceptably’ adverse impacts
- Policy should refer to cross boundary opportunities
- Two respondents supported the policy

Policy T7

- Viability implications have not been assessed
- Policy should be less prescriptive to allow flexibility
- Requirement not supported by evidence
- No justification for thresholds selected
- Detail should be included in the plan not an SPD
- Passive provision should be required for all dwellings most commercial enterprises

8. Chapter 8: Built Environment

| | | |
|--------------------------------------------|-----------|-----------|
| Total number of Comments received | | 38 |
| Objected | | 21 |
| Supported | | 17 |
| BE1 Heritage Assets | Objected | 7 |
| | Supported | 6 |
| BE2 Design of new development | Objected | 8 |
| | Supported | 5 |
| BE3 Protection of the amenity of residents | Objected | 1 |
| | Supported | 2 |
| BE4 Density of new development | Objected | 4 |
| | Supported | 3 |

Main issues:

- Concern that there are some heritage assets that are not designated and do not enjoy statutory protection and that the VALP does not provide protection
- Concern for the impact of the growth at Halton on local heritage assets
- Wish for clarity on what the Design SPD will contain and request for it to be made available for consultation now
- Request for changes to the density policy in BE4 to more reflect site by site considerations than just surrounding areas and the policy is lacking in detail
- Support for Policy BE3 on the protection of the amenity of residents

9. Chapter 9: Natural Environment

| | | |
|---------------------------------------------------------|-----------|------------|
| Total number of Comments received | | 128 |
| Objected | | 88 |
| Supported | | 40 |
| NE1 Protected sites | Objected | 4 |
| | Supported | 3 |
| NE2 Biodiversity and geodiversity | Objected | 11 |
| | Supported | 3 |
| NE3 River and stream corridors | Objected | 6 |
| | Supported | 2 |
| NE4 The Chilterns ANOB and setting | Objected | 5 |
| | Supported | 3 |
| NE5 Landscape character and locally important landscape | Objected | 10 |
| | Supported | 4 |
| NE6 Pollution, air quality and contaminated land | Objected | 4 |
| | Supported | 3 |
| NE7 Local green space | Objected | 2 |
| | Supported | 2 |
| NE8 Best and most versatile agricultural land | Objected | 9 |
| | Supported | 3 |
| NE9 Trees, hedgerows and woodlands | Objected | 5 |
| | Supported | 8 |

Main issues:

- Concern that Policy NE1 on protected sites is not sufficiently wide ranging, the policy should establish a hierarchy of European sites and assign them appropriate weight in line with the NPPF para 113
- Sites protected under policy NE1 need an area around them protected in order that they can function properly
- Considerable support for all the policies in the chapter
- That Policy NE2 does not accord with the NPPF para 109 on the matter of providing net gains in biodiversity and that NE2 is unclear without the SPD on the form of biometrics calculator.
- The size of the ecological buffer in Policy NE3 – some think the buffer is too large other say it should be larger
- Policy NE3 could be made more effective by requiring the monitoring and evaluation of biodiversity or green infrastructure improvement

- Support for policy NE4 although changes could be made to the policy to improve its clarity and make it less confusion
- Policy NE5 on landscape is overly restrictive, inconsistent with national policy and the district Landscape Character Assessment needs replacing with new fieldwork. There is also some strong support for the policy.
- Comments on the issue of light pollution and that street lighting is used too extensively during the day
- Responses that on the issue of air quality, the VALP is not proactive and positive enough in light of the growth with more homes to be built and more traffic movements
- Support for Policy NE6 on pollution but there should be a more specific reference to the potential pollution of groundwater
- Concern that Policy NE8 on agricultural land is overly restrictive and inconsistent with the NPPF para 112 as it omits a reference to 'significant development of agricultural land'
- Considerable strong support for Policy NE9 on Trees however also comments objecting that there can be instances where replacement planting may not always be achievable.

10. Chapter 10: Countryside

| | | |
|---------------------------------------|-----------|-----------|
| Total number of Comments received | | 28 |
| Objected | | 14 |
| Supported | | 14 |
| C1 Conversion of rural buildings | Objected | 0 |
| | Supported | 4 |
| C2 Equestrian development | Objected | 1 |
| | Supported | 3 |
| C3 Renewable energy | Objected | 8 |
| | Supported | 5 |
| C4 Protection of public rights of way | Objected | 2 |
| | Supported | 1 |

Main issues:

- Request for a reference to the Chilterns Building Design Guide to apply in the AONB
- Support for Policy C2 on Equestrian Development
- Objections to various aspects of Policy C3 on Renewable Energy (such as decentralised energy and Combined Heat and Power) on imposing onerous burdens on development but also failing to recognise other mechanisms to reduce carbon footprints.
- Concern that there has been a loss of public rights of ways (Policy C4) around Aylesbury, the policy could be improved with some amendments but also support for the policy.

11. Chapter 11: Detailed Infrastructure

| | |
|-----------------------------------|-----------|
| Total number of Comments received | 63 |
|-----------------------------------|-----------|

| | | |
|-------------------------------------------------------|-----------|-----------|
| Objected | | 44 |
| Supported | | 19 |
| I1 Green infrastructure | Objected | 4 |
| | Supported | 5 |
| I2 Sports and recreation | Objected | 4 |
| | Supported | 0 |
| I3 Community facilities and assets of community value | Objected | 1 |
| | Supported | 3 |
| I4 Flooding | Objected | 7 |
| | Supported | 0 |
| I5 Water resources | Objected | 11 |
| | Supported | 3 |
| I6 Telecommunications | Objected | 0 |
| | Supported | 2 |

Main issues:

- The policy should be more positively worded to recognise the opportunities to reduce flooding.
- The policy falls short of a strategic approach. Incorporating the Green Infrastructure Strategy within the plan will help to amend this.
- General support for the policy.
- The supporting text and policy should include water and wastewater infrastructure in order to provide more clarity and effectiveness.
- Policy should require mitigation if there are any additional recreational pressures from growth.
- The VALP site at Halton Camp has excellent sports facilities and should be improved and protected
- Concern that there is no up to date SPD on sports and recreation evidence base and that the Council is yet to adopt a Playing Pitch Strategy or Built Sports Facilities Strategy
- The definition of 'Community Facilities' is unclear for example if theatres, cultural buildings and pubs are covered.
- Sites to be allocated including 'Land north of A41' (WTV016, WTV018 and BIE022) have not been adequately tested on flood risk in terms of sequential and exception test.
- Policy I4 needs a reference to sewer flooding adding
- Policy I4 needs amending to better understand the impact of climate change
- The plan is unclear on how it proposes to reduce the state of Water Stress to ensure a high quality water supply for the increased population
- Policy I5 does not adequately show how the Wastewater Treatment Works at Buckingham is going to be upgraded and how Water Framework Directive standards are going to be met.
- Support for Policy I6 as a strategy for telecommunications development

12. Policies Maps

| | |
|-----------------------------------|-----------|
| Total number of Comments received | 32 |
|-----------------------------------|-----------|

| | |
|-----------|-----------|
| Objected | 31 |
| Supported | 1 |

Main issues:

- Concern that the 'no built development' notation on the Policies Maps
- Various sites as commitments should be shown on the policies maps
- Site BUC043 should be deleted as the site has had a planning application rejected in 2017
- The map for Halton needs various amendments to show the location of employment sites and remove the existing playing fields from the site allocation area
- The map for land adjacent Milton Keynes and Bletchley should include land for 1,200 homes allocated at Eaton Leys
- The Waddesdon map area showing 'no built development' on site WAD006 should not be included in the site allocation as it is a designated Local Green Space in a made neighbourhood plan.
- Extent of Primary Shopping Area should be increased to reflect the situation at the end of plan period
- No suggestion from the map that coalescence between Aylesbury town and Stoke Mandeville village will be avoided.

Table 1 Summary of representations received from Duty to Co-operate Bodies

| Organisation | Summary | Additional rep info |
|---------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Environment Agency Respondent: Kidd, Michelle | <p>Flood Risk/ Sequential Test</p> <ul style="list-style-type: none"> • 16 Neighbourhood Plan – not clear if any are in flood zones or sequentially tested • Not clear how sites that were discarded in the sequential test outweigh flood risk of those which passed <p>Flood Risk/Exception test</p> <ul style="list-style-type: none"> • Part 2 sites can only be passed when deterring a development proposal yet WTV018,BIE022 & ST0016 have already been passed <p>Flood risk/the plan</p> <ul style="list-style-type: none"> • Proposed amendments to ensure greater conformity with NPPF Para’s 100&101 • Proposed amendments for greater clarity and accuracy <p>Flood risk/Gypsy & Travellers</p> <ul style="list-style-type: none"> • No sequential test for G&T Sites – any in 3b would raise question of soundness • More modelling required for allocated sites <p>Nature Conservation & Water courses</p> <ul style="list-style-type: none"> • Suggested minor amendments for clarity and accuracy • NE2 – need to include green field and other sites • NE3 – minor amendment to improve clarity • Site allocations, minor amendments suggested for clarity, also to ensure ecological buffers and enhance biodiversity | <p>Which section are you responding to?</p> <ul style="list-style-type: none"> • Exception test & • Level 2 SFRA <p>Do you consider the plan to be sound?</p> <ul style="list-style-type: none"> • No <p>If you do not consider the plan to be sound, specify on what grounds:</p> <ul style="list-style-type: none"> • Not justified & not effective |

| Organisation | Summary | Additional rep info |
|----------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------|
| | <p>Water Quality/WCS Evidence</p> <ul style="list-style-type: none"> • Concern over the phosphate deterioration at Buckingham and the clarity of the policy and the ability to meet objectives of WFD <p>Water Quality/Waste Water</p> <ul style="list-style-type: none"> • Concern over phasing of development and the delivery of additional capacity. Timescales may not correspond <p>Water Quality/ WQA</p> <ul style="list-style-type: none"> • Phosphate deterioration at Winslow maybe a limitation on proposed growth <p>Water Quality/IDP</p> <ul style="list-style-type: none"> • Include sites for works under Anglian Water not just Thames Water <p>Water Quality/the plan</p> <ul style="list-style-type: none"> • Overall suggestions for inclusion or minor modification for clarity, conformity and accuracy <p>Ground water quality & contaminated land</p> <ul style="list-style-type: none"> • Potential pollution of groundwater needs more mention • Protection of ground aquifers needs to be incorporated more, particularly throughout site allocation policies • Potential concerns with specific allocation sites Boarstall, HAI003 & Westcott <p>Water Resources</p> <ul style="list-style-type: none"> • Suggested improvements for clarity, accuracy and consistency | |
| <p>Natural England Respondent;</p> | <p>Natural England’s concerns mainly centre around the clarification of the wording of policies</p> | <p>Which section are you responding to?</p> <ul style="list-style-type: none"> • Environment |

| Organisation | Summary | Additional rep info |
|--------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Macpherson, Kirsty | <ul style="list-style-type: none"> • Policy D1 – compliance with NPPF 115 AONB • Policy NE4 – effectiveness; lack of ref to best practice • Policy D1 – compliance with NPPF 109 & Biodiversity • Policy D1 – compliance with NPPF/effectiveness; NPPF 114 & infrastructure/GI • Policy D1 – Compliance with NPPF/effectiveness; 109, Biodiversity & GI • Policy S1 – Compliance with NPPF/effectiveness 109, EN2 & I1 • Infrastructure section 3.38 – Compliance with NPPF/effectiveness; NPPF 109 & 114, spatial plan and EN2 & I1 • Spd Section 4.4 – compliance with NPPF 109 & 114 • Aylesbury Garden Town Vision – compliance with NPPF 109 • Minor modification proposed to site specific policies for improved effectiveness: D-AGT1 South Aylesbury, D-AGT2: South west Aylesbury, D-AGT3: Aylesbury north of A41, D-AGT4 Aylesbury south of A41 , D-AGT6: Kingsbrook • D-AGT3 – compliance with NPPF 109 • D-HAL003 – effectiveness; NE1 & NE2 • NE1-9, I1 and I4 – effectiveness NPPF 109,114 & 117 • NE9 – Compliance with NPPF 118 • NE6 – Compliance with NPPF 117 • S4 – Effectiveness; Biodiversity mitigation, NPPF 117 & 109 • Minor modification proposed to site specific policies for compliance with NPPF 112 & NE8, BMV Land used preferentially for GI & OGS • Modification to allocation policies for development within Aylesbury – effectiveness & compliance with D1 | <p>Do you consider the plan to be sound?</p> <ul style="list-style-type: none"> • No <p>If you do not consider the plan to be sound, specify on what grounds:</p> <p>Not effective Not consistent with National Policy Does not meet test of deliverability</p> |

| Organisation | Summary | Additional rep info |
|----------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | <ul style="list-style-type: none"> • Site allocation policies – compliance with NPPF 109 & NE1-9 • D4 – compliance with NPPF 109, 117 & NE1-9 • D-BUC051 – compliance with NPPF 114 & 109 • Section 4.174 – 4.225 – effectiveness of principle 6 & GI • D7 – compliance with NPPF 114 • D8 – compliance with NPPF 114 • H2, E8, E9 & C2 – compliance with NPPF 109, 114 & 117 + NE1-9 • E7- effectiveness; NE2 • Allocation maps – effectiveness I11 & NPPF 109 & 117 | |
| <p>Historic England</p> <p>Respondent; Small, Martin</p> | <p>Paragraph 1.7: failure to give adequate regard to the environmental aspect of sustainable development in accordance with NPPF; para 7.</p> <p>Paragraph 1.18: no reference to any historic environment evidence therefore plan is no built on adequate up-to-date evidence, therefore not sound and not consistent with NPPF paragraph 169</p> <p>Paragraphs 1.58-1.61: suggested improvements to be more consistent with NPPF paras 126 & 157</p> <p>Spatial vision: no commitment to the protection and enhancement of the heritage assets in Buckingham</p> <p>Strategic Objectives: suggested improvements to enable the council to do more to ensure the protection and enhancement of the district’s built, natural and historic environment to meet NPPF para’s 126, 157 & 9</p> | <p>Which section are you responding to?</p> <ul style="list-style-type: none"> • Historic Environment <p>Do you consider the plan to be sound?</p> <ul style="list-style-type: none"> • No <p>If you do not consider the plan to be sound, specify on what grounds: failure to be consistent with national planning policy</p> |

| Organisation | Summary | Additional rep info |
|--------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|
| | <p>Policy S1: currently not sound and not in accordance with NPPF para's 126 or 132</p> <p>Table 2: the sustainability of settlements fails to regard the environmental capacity of settlements and not in accordance with para 3.10</p> <p>Policy D1: suggested wording change for NPPF consistency</p> <p>D-AGT1: South Aylesbury – currently not sound as its not consistent with NPPF 126 & 157, site specific requirement suggestions provided</p> <p>Paragraph 4.47: Not sound. Policy D-AGT1 does not provide adequate protection to heritage assets in accordance with NPPF 126 & 157</p> <p>Paragraph 4.49: failure to adequately retain the setting of heritage assets</p> <p>D-AGT2: Not sound. Policy D-AGT2 does not provide adequate protection to heritage assets in accordance with NPPF 126 & 157</p> <p>D-AGT3: Not sound. Policy D-AGT3 does not provide adequate protection to heritage assets in accordance with NPPF 126 & 157</p> <p>D-AGT4: the master plan needs to be informed by adequate heritage evidence to comply with NPPF 126 &157 & D1</p> <p>D-AGT5: further site specific requirements suggested to meet requirements of NPPF 126 & 157</p> <p>D-AGT6: retention and enhancement of historic landscape features and archaeological</p> | |

| Organisation | Summary | Additional rep info |
|--------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|
| | <p>remains to be a site-specific requirement</p> <p>D-AYL032: site includes Grade II listed Ardenham House. should be a specific criterion requiring the retention of this building as part of criterion (d) of Policy D-AYL032</p> <p>D-NLV001: minor wording modification to accord better with NPPF & Strategy for conservation</p> <p>D-HAL003: not sound. does not provide adequate protection to heritage assets in accordance with NPPF 126 & 157</p> <p>Paragraph 4.125: minor modification for NPPF conformity</p> <p>D8: minor modification for NPPF conformity</p> <p>D10: Not sound failure to provide adequate protection to heritage assets and environment in accordance with NPPF 126 & 157. Also a query on the policy wording of 'may be permitted'</p> <p>H3: ask for inclusion on rural workers dwellings</p> <p>E2, E6, & E7: suggested minor modifications</p> <p>Section 8: suggested changes and modifications throughout</p> <p>BE1: not sound. As worded not consistent with NPPF 132-135 and failure to adequately accord with NPPF 126 & 157. fails to set out a positive and clear strategy. Not sound as there is not an adequate up to date evidence base relating to the historic environment - Not in accordance with NPPF 169</p> | |

| Organisation | Summary | Additional rep info |
|-------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | <p>NE5: lack of clarification to determine difference between AALs & LLAs</p> | |
| <p>Wycombe District Council;</p> <p>Respondent; Morris, Charlotte</p> | <p>Minor Modification due to error: VALP which identifies 2,250 dwellings for Wycombe’s unmet housing need. We ask that this is corrected to be that set out in the July 2017 Memorandum of Understanding for 2,275 dwellings</p> <p>Effectiveness query: H1 – unclear what this will deliver in terms of potential affordable housing supply and whether sufficient affordable housing will be provided to meet the proportion of unmet housing needs to be accommodated in Aylesbury Vale from Wycombe District. Clarify through either VALP or evidence base</p> <p>Policy e1, Part C: main town centre uses will not be supported on key employment sites, except as ancillary facilities to service a key employment site. The NPPF includes ‘offices’ as a main town centre use therefore this policy should be amended to take this into consideration.</p> <p>Bucks HEDNA: references to HEDNA, throughout the employment land chapter are incorrect, e.g. para. 4.174 1st sentence should refer to the Bucks HEDNA Update, December 2016 (not 2015). Bucks HEDNA Addendum (para. 4.175) was produced by Atkins and ORS and was published in September 2017. Para. 4.176 refers to a property market review by the LEP. This is included as Appendix A of the HEDNA Addendum (September 2017). References should be checked accordingly.</p> | <p>Which section are you responding to?</p> <ul style="list-style-type: none"> • Housing • Affordable housing • employment <p>Do you consider the plan to be sound?</p> <ul style="list-style-type: none"> • Yes <p>If you do not consider the plan to be sound, specify on what grounds:</p> |
| <p>Chiltern & South Bucks DC</p> <p>Respondent; Ansari, Shereen</p> | <p>Housing; support un met need requirements as agreed by Duty to Co-operate. Support affordable housing proportion to address transferred affordable need.</p> <p>Employment; Support paragraph 1.14 & Policy S2</p> <p>Early review; supports S9</p> | <p>Which section are you responding to?</p> <ul style="list-style-type: none"> • Housing • Employment • Early review <p>Do you consider the plan to be sound?</p> |

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| | | <ul style="list-style-type: none"> • Yes |
| <p>Buckinghamshire County Council</p> <p>Respondent; Sharp, Sally</p> | <p>Highlight a number of outstanding concerns and suggested amendments for the adopted Vale of Aylesbury Local Plan. These points include clarification on:</p> <ul style="list-style-type: none"> • The assessment of housing need and how the Government’s position on the methodology may affect the plan over the plan period. • School place provision - BCC have set out a position statement for education provision across the district, highlighting where infrastructure proposals for new or expanded schools have been agreed and included in the Infrastructure Delivery Plan. • Suggested amendments to site specific policies - Highways Development Management, Flooding and Public Rights of Way have set out a number of suggested amendments to ensure consistency throughout and to provide greater opportunities for improving connectivity via sustainable modes of travel and strategic flood risk management. • Suggested amendments to policies C4 Protection of public rights of way, D1 Detailed Infrastructure on Green Infrastructure, H6 Housing mix, BE2 Design of new development, Policy BE1 Heritage Assets. BCC is asking for further clarity with regards to the proposed content of the Design SPD, the reference to Lifetime Homes within the Aylesbury Garden Town supporting text and how this links to policy H6 Housing Mix, and suggested amendments to policies on Heritage Assets and Archaeological Interest. • General comments in relation to health and wellbeing - the Public Health team | <p>BCC considers the plan to be legally compliant, complies with the Duty to Co-operate and sound.</p> |

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| | <p>have set out a number of suggestions to allow for a greater emphasis on health and wellbeing throughout the plan, as well as seeking clarification on the assessment of the cumulative impact of new development on existing and new residents.</p> <ul style="list-style-type: none"> • Suggested amendments and areas of clarification on the Level 2 Strategic Flood Risk Assessment Final Report and Aylesbury Vale District Flood Risk Sequential Test and | |
| <p>Buckinghamshire and Milton Keynes Natural Environment Partnership</p> <p>Respondent; Thomas, Nicola</p> | <p>Section 4 – strategic delivery Suggested modifications are proposed for paragraphs 4.18 & 4.19 Request specific commitment to work with the Buckinghamshire and Milton Keynes Natural Environment Partnership (the “NEP”) in respect of the AVGT (aligned or cross-referenced to the mention at Para 11.9, Detailed Infrastructure – Principles for Aylesbury Vale).</p> <p>In particular - that the SDPs and design guidance being put together specifically endorse and put into practice the Vision and Principles for the Improvement for Green Infrastructure in Buckinghamshire and Milton Keynes, as identified by the NEP in 2016 (link provided)..</p> <p>Section 11 – Detailed infrastructure Policy I1 Suggested modifications proposed for Paragraph 11.5</p> <p>Request Local Plan acknowledges the need for collaborative working with the Buckinghamshire and Milton Keynes Natural Environment Partnership, (the “NEP”), the area’s Local Nature Partnership.</p> <p>Also for the Plan to consider and plan where the best opportunities were for</p> | <p>Which section are you responding to?</p> <ul style="list-style-type: none"> • Section 4 – strategic delivery • Section 11 – Detailed infrastructure Policy I1 <p>Do you consider the plan to be sound?</p> <ul style="list-style-type: none"> • No <p>If you do NOT consider the Local Plan to be sound, please specify on what grounds:</p> <ul style="list-style-type: none"> • Effectiveness |

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| | biodiversity and GI are – in advance of development - and by considering existing GI assets, features, corridors, what needs to be retained, enhanced, protected and connected, and to look for opportunities, through development, to do this. | |
| Central Bedfordshire Council Respondent; Hicks, Sally | <p>Housing need</p> <ul style="list-style-type: none"> • Supports the HMA extent and HEDNA Methodology. Encouraged by proactive measures to boost housing supply. Commend Duty to Co-operate work with adjoining councils. • Supports growth strategy and allocations at strategic settlements • Supports need for early review <p>Employment</p> <ul style="list-style-type: none"> • Support need to retain and review Employment land, encourage the retention of good quality employment land <p>Green belt</p> <ul style="list-style-type: none"> • Support conclusions of GB and extension west of Linslade <p>CBC Local plan Timetable and Duty to Co-operate</p> <ul style="list-style-type: none"> • Surprised the joint work undertaken in respect to the Luton HMA Growth options study is not referenced- as a minimum to say it concluded Aylesbury does not at present need to take unmet need from Luton | <p>Which section are you responding to?</p> <ul style="list-style-type: none"> • Housing need • Employment • Green belt • CBC Local plan Timetable and Duty to Co-operate |
| Hertfordshire County Council - Spatial Planning and the Economy Environment Department | <p>Proposed growth in Aylesbury Vale</p> <p>needs to be an understanding of the likely cross boundary, cumulative impacts on the highway and transport networks of planned growth in all of these areas. Joint working with neighbouring Local Planning Authority and Local Highway Authority to understand and address these challenges may be needed in some areas in particular.</p> <p>Cumulative and Cross-boundary Impacts</p> | <p>No comment made on soundness or legal compliance</p> |

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| <p>Respondent; Claridge, Lewis</p> | <p>Cumulative Impact Assessment does not appear to consider impacts that may result outside of the border of the Vale of Aylesbury Local Plan. We also note the Aylesbury Transport Strategy commissioned by Bucks County Council and that transport modelling work has been undertaken – again, we have some concerns about how cross boundary impacts and cumulative growth is factored in.</p> <p>level of growth at Aylesbury, particularly on the eastern and southern edge, will worsen traffic conditions on parts of the Hertfordshire network. Is the impact on networks outside of Buckinghamshire accurately picked up in the VALP’s transport evidence base? Are cumulative impacts outside of Aylesbury Vale considered?</p> <p>Aylesbury Transport Strategy proposals concerns about whether these link roads would increase demand and through traffic that would adversely affect the Hertfordshire network</p> <p>There is concern that the transport policies and proposals in the VALP and supporting ATS will perpetuate high levels of car use and add to existing traffic and congestion issues on the Hertfordshire network.</p> <p>The VALP and ATS propose a ‘Primary Public Transport Corridor’ on the A41 approaching central Aylesbury. welcome introduction of bus priority measures on this route and elsewhere first, not after the link roads are established.</p> <p>P&R site off the A41; more insight into BCC’s proposals so it can be considered and factored in to HCC’s transport planning in a complementary way.</p> <p>improvements are in mind for cycling routes in this part of the district. Aylesbury Vale needs to work with HCC and Dacorum Borough Council to ensure any planned cycle routes and the wider network fit together.</p> | |

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| | <p>HCC would welcome closer engagement with AVDC / BCC to better understand transport and highway implications of growth and planned development, infrastructure needs and transport proposals in our respective authority areas.</p> | |
| <p>Hertfordshire County Council – Resources Property</p> <p>Respondent; Wong, Velda/ Wells, Martin</p> | <p>Wendover/Halton HCC would anticipate that any increase in demand arising from new housing proposed in Aylesbury Vale District is managed in the local area(s) with new school places being provided where required as part of Buckinghamshire’s school planning strategy. (primarily relates to secondary school provision and potential push back)</p> <p>Aston Clinton HCC would recommend that Aylesbury Vale District Council ensure that sufficient school places are provided in tandem with the proposed new housing development to prevent additional pressure being placed on existing schools where there are already capacity issues.</p> <p>Pitstone HCC would recommend that Aylesbury Vale District Council ensure that sufficient school places are provided in tandem with the proposed new housing development to prevent additional pressure being placed on existing schools where there are already capacity issues.</p> <p>HCC note the proposed primary schools to form part of the development, however, it is not clear whether the two new schools would provide sufficient spaces to serve the additional population.</p> <p>D-AGT4 As opposed to primary school provision, no detailed information regarding secondary</p> | <p>Which section are you responding to?</p> <ul style="list-style-type: none"> • School provision |

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| | <p>schools are included in the Proposed Submission document. The latest forecast for Tring (secondary school) shows a deficit every year, varying between -0.3 FE to -1.1FE up to 2020/21. An existing inflow of approximately 2FE per year of children living in Buckinghamshire contributes towards the forecast demand.</p> <p>HCC would recommend that Aylesbury Vale District Council to ensure that sufficient school places are provided in tandem with the proposed new housing development to prevent additional pressure being placed on existing schools where there are already capacity issues.</p> | |
| <p>Milton Keynes Council;</p> <p>Respondent; Wellstead, Jon</p> | <p>Request one minor modification to Salden Chase policy (pages 110-114) in the proposed submission VALP:</p> <ul style="list-style-type: none"> To insert in the Salden Chase policy a requirement for a green buffer to be included on the eastern edge of the site to protect the adjacent community of West Bletchley. | <p>Which section are you responding to?</p> <ul style="list-style-type: none"> Salden Chase Policy |
| <p>NHS Chiltern & Aylesbury Vale Clinical Commissioning Groups</p> <p>Respondent; Helen Delaitre</p> | <p>Primary care services are already operating under extreme pressure and physical constraints, such as the lack of space hampers the delivery of additional services. Delivery of this Local Plan will put significant pressure on the existing primary care infrastructure however, the CCGs (including Milton Keynes) welcome the opportunity to work with AVDC to determine more detailed health infrastructure requirements as part of developing the Infrastructure Delivery Plan</p> <p>Page 45 – infrastructure: Delivery will be subject to the availability of funding and developer contributions</p> <p>AGT2: The CCGs will not support the use of temporary buildings to deliver quality health care.</p> <p>AGT3: Delivery will be subject to the availability of funding and developer</p> | <p>Which section are you responding to?</p> <p>Salden Chase Policy</p> <ul style="list-style-type: none"> Healthcare infrastructure Site specific policies Growth plan and healthcare Housing for older people <p>No Comment made on soundness or legal compliance</p> |

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| | <p>contributions.</p> <p>AGT4: The CCGs would not support provision of health services within temporary modular buildings. Service delivery will not be sustainable within a temporary facility as the infrastructure and workforce requirements are not adequate to provide quality patient care. consider supporting the use of an established GP Partnership to become the temporary health care provider for residents of Hampden Fields. For example, the Westongrove Partnership has 3 sites which sit strategically around the Hampden Fields and Woodlands Developments.</p> <p>section 2.3.1 of the draft S106: “an alternative location for the temporary health centre may be agreed from time to time with the Council”. As above, we would like to progress this clause further with the local authority and agree arrangements for the temporary health provision to be provided by an established GP provider with funding from the S106.</p> <p>AGT6: CCG cannot support the plans for a separate doctor’s surgery in Kingsbrook, there could be an opportunity to change the design to accommodate smaller units for private health providers in the form of dentistry, chiropody or pharmacy services with general practice health services provided off site at a nearby established practice.</p> <p>Barratt Homes to consider supporting the use of Poplar Grove Surgery as the primary health care provider for Kingsbrook.. To accommodate extra patients there would be a requirement to modify the Poplar Grove premises, to accommodate the full quota of patients in preparation for the completion of the development. We would seek Section 106 to fund this proposal.</p> <p>Buckingham 4.126: practice is keen to relocate and consolidate its existing premises (apart from Steeple Claydon) onto a new purpose-built development at Lace Hill. Still</p> | |

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| | <p>early stages but anticipate a substantial contribution from developers should plans go ahead regarding the proposed developments in the VALP</p> <p>Winslow: capacity is now insufficient to meet demand and the ability of the practice to improve access to patients is limited by Grade II Listed Building constraints. With Norden House being described as “not fit for purpose” and ad hoc arrangements at Winslow Health Centre being limited, a new build surgery will be required in the future to cope with future expansion. Delivery will be subject to the availability of funding and developer contributions.</p> <p>Larger villages: impacts hard to evidence but can be severe through piecemeal development anticipate that there might be a requirement for modification to existing infrastructure using CIL contributions.</p> <p>Housing for older people: Although care of the elderly does not necessarily require additional physical space within the primary care setting, we would ask the council to bear in mind the additional workload.</p> <p>summary comment: the delivery of this Local Plan will put significant pressure on the existing primary care infrastructure. However, the CCGs welcome the opportunity to work with AVDC and the Developers to design a service that will future proof the delivery of quality primary care for Aylesbury Vale residents.</p> | |
| <p>Oxfordshire County Council</p> <p>Respondent; Currie, Linda</p> | <p>not satisfied that:</p> <p>i. The impacts of proposed growth in Aylesbury Vale on the highway network within Oxfordshire have been fully assessed, taking account of already planned and proposed growth within Oxfordshire and the infrastructure options being planned to support it;</p> <p>ii. Necessary mitigation measures have been identified and costed; and</p> | <p>concerns that the draft VALP as currently written would be unsound in relation to the provision for supporting transport infrastructure</p> |

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| | <p>iii. Funding will be forthcoming when needed to deliver the infrastructure matched to the proposed growth.</p> <p>reiterate willingness to be involved in additional work, the outcome of which is likely to require amendments to local plan policy and/or text and additions to the Infrastructure Delivery Plan (IDP).</p> <p>Would be pleased to be party to a Memorandum of Understanding (MoU) between AVDC, Buckinghamshire County Council (BCC), Oxfordshire County Council and Cherwell District Council which sets out how the councils will collaborate on a programme of transport work, including consideration of the A41 corridor as a priority. We are also willing to be party to a separate MoU between AVDC, BCC, OCC, South Oxfordshire District Council and Wycombe District Council setting out how impacts of planned growth within Buckinghamshire on the highway network within South Oxfordshire have been assessed and how necessary mitigation measures will be funded and delivered.</p> <p>Proposed Scale and Distribution of Growth: Support in principle</p> <p>Implications of Strategic Transport Infrastructure Proposed for the Oxford-Cambridge Corridor Support T2 & T3</p> <p>Local Transport Infrastructure: little work on cross-boundary transport impacts to date. A programme of additional work has recently been agreed in principle</p> | <p>If you do NOT consider the Local Plan to be sound, please specify on what grounds:</p> <ul style="list-style-type: none"> • Positively Prepared • Effective • Consistent with National Policy |

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| | <p>A41 Corridor concerned insufficient attention has been paid to Previous comments</p> <p>Assumptions unclear for the Buckinghamshire Transport modelling work 3 for planned growth at Bicester Garden Town and the strategic infrastructure options to support it. The impact on the A41 corridor will change depending on the transport scenarios teste. pleased to provide more information on these schemes, as set out in our Local Transport Plan 2015-2031 and 2017 Oxfordshire Infrastructure Strategy (OxIS).</p> <p>Overall, further work is needed for the A41 corridor</p> <p>A418 corridor/Thame Roundabout Capacity concerns, increased cross boundary traffic flows, no reference to mitigation measures within Oxfordshire. Sustainable modes of transport between Haddenham and Thame</p> <p>Soundness Issue: Further work is required on the transport and infrastructure evidence supporting the draft VALP, the outcome of which is likely to require amendments to the draft plan and IDP to set out necessary transport mitigation measures within Oxfordshire and how they are to be funded.</p> <p>Buckinghamshire County-wide Traffic Model Phase 3; not clear how traffic flows on strategic routes outside of the county were considered.</p> <p>T1: ‘Delivering the sustainable transport vision’ does not mention OCC as a partner and lacks detail about the schemes or evidence base.</p> <p>T6 Cycle routes – refers to county-wide and local strategies but does not appear to consider cross-boundary opportunities.</p> | |

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| | <p>Duty to Cooperate Paper: confirms that no transport evidence base has been obtained from Oxfordshire County Council.</p> <p>Infrastructure Delivery Plan: Bicester North railway station, unclear whether the traffic impact of this has been assessed, or how this is changing with the development of EWR and Winslow Station.</p> <p>Primary Public Transport Corridors (PPTCs); A41 – Bicester road - preference for a joined up solution to this corridor</p> <p>Transport Modelling: not enough supporting information provided and failure to adequately consider cross-boundary links</p> <p>Public Transport and Active travel; Strategic 280 Bus route – development in Haddenham could provide funding to increase service rate. Haddenham to Thame cycle path also welcomes contributions</p> | |
| <p>South Oxfordshire District Council (officers Response)</p> <p>Respondent; Hunt, Ryan</p> | <p>Housing Need recognised that AVDC has sufficient suitable and deliverable sites to meet this need and would not require any of this to be met by SODC. SODC would like to maintain an ongoing dialogue and be updated following any review of the housing need for AVDC and any unmet need resulting from the wider Central Buckinghamshire HMA.</p> <p>Haddenham and Thame cross border issues Overall the sites proposed for development within the VALP are not considered to have a significant cross border impact on South Oxfordshire. However Haddenham remains a potential location for a new settlement if after a review of the plan it is</p> | <p>SODC considers the plan to be sound, legally compliant and meet the requirements of Duty to Cooperate.</p> |

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| | <p>determined the need exists. SODC would like to remain in contact on this issue in order to better understand the cross-border impacts of the proposed development and any future growth in the area, particularly on the A415 between Haddenham and Thame.</p> <p>Oxford – Cambridge Expressway Implications The proposed Southern route option would likely run in close proximity to Thame and Haddenham and would have a significant impact on the area. Should a more northerly route be chosen, this could also have wider traffic and environmental impacts that would need careful consideration. – Further Joint work anticipated.</p> <p>Chinnor Reservoir No longer plans for a reservoir therefore land no longer needs to be safeguarded.</p> <p>Duty to Co-operate SODC looks forward to finalising a formal MoU being drafted, and MoU/ SCG on cross-border transport matters.</p> | |
| <p>Dacorum Borough Council</p> <p>Respondent; John Chapman</p> | <p>State that the plan is sound</p> | <p>DBC considers plan to be sound</p> |
| <p>University of Buckingham</p> <p>Respondent: Online Web-rep – by agent Jones, Sarah; Delta</p> | <ul style="list-style-type: none"> • Support: the Growth of Buckingham Town • Object: Gawcott should be allocated for development – should provide housing allocations within the plan period to assist with meeting District Requirement • Object: GAW002 – evidence in HELAA is at odds with the Strategic Landscape and Visual Capacity Study – HELAA evidence should be revisited | <p>currently written would be unsound in relation to the provision for housing</p> <p>If you do NOT consider the Local Plan to be sound, please specify on</p> |

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| Planning | <ul style="list-style-type: none"> • Object: more development required to be allocated to meet housing needs • Support: acknowledgement that growth will take place at Strategic, large, medium and smaller villages • Object: early review of plan – current plan should take into account the new Gov Methodology • Object; to capacity led approach – latest version of plan does not have the allocation at Gawcott now due to the capacity based approach – previous approach was more sustainable • Object: allocations should be provided on the basis of settlement size. | <p>what grounds:</p> <ul style="list-style-type: none"> • Positively Prepared • Justified |