Vale of Aylesbury Local Plan

Duty to Co-operate

Statement of Compliance

November 2017
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1.0 **Introduction**

1.1 **what is the DtC and its policy context**

The duty-to-cooperate was introduced by the Localism Act 2011, which amends the Planning and Compulsory Purchase Act 2004. It places a legal duty on local planning authorities, county councils in England and public bodies to effectively engage and maximise effectiveness of plan preparation with regard to strategic cross-boundary measures.

The NPPF gives guidance on the types of strategic matters where the duty-to-cooperate may apply, such as:

- Homes and jobs
- Provision of retail, leisure and commercial development
- Provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and the provision of minerals and energy
- Provision of health, security, community and cultural infrastructure
- Climate change mitigation and adaptation
- Conservation and enhancement of natural and historic environment

The NPPF gives guidance on the types of strategic matters where the duty-to-cooperate may apply, such as:

In addition to demonstrating that the plan has been prepared in accordance with the duty-to-cooperate, local authorities must demonstrate how joint working has influenced policy outcomes within the plan in order for the plan to be found sound at examination.

The NPPF sets out the tests of soundness which will be used in examination; two of these tests, whilst not formally a requirement of the duty to cooperate, relate to the duty-to-cooperate:

- ‘Positively prepared’ – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so whilst achieving sustainable development, and
- ‘Effective’ – the plan should be deliverable over the plan period and based on effective joint working on cross-boundary strategic priorities.

The National Planning Policy Guidance was launched in March 2014 with the intention of making all planning guidance available in one place in a clear and easy-to-use form.
It states that Local Planning Authorities must demonstrate how they have complied with the duty. If a Local Planning Authority cannot demonstrate that it has complied with the duty then the local plan will not be able to proceed further in examination. The NPPG expands on the extent to which Local Planning Authorities should cooperate. The duty to cooperate is not a ‘duty to agree’, but must demonstrate that planning authorities have made every effort to seek necessary agreements and cooperation over strategic planning matters prior to submitting the plan for examination.

Should another authority or organisation subject to the Duty not cooperate on strategic cross-boundary issues it must be demonstrated with comprehensive and robust evidence of the efforts that have been made to cooperate and any outcomes achieved. This does not necessarily mean that the plan will fail examination.

In terms of what actions constitute effective cooperation under the duty-to cooperate the Guidance states that as it depends on local needs, there is no definitive list of actions that constitute effective cooperation. Cooperation should 'produce effective policies on cross boundary strategic matters. Some of these actions include:

- Joint research and evidence to define scope of the Local Plan
- Assessing policy impacts
- Assembling the necessary material to support policy choices.
- Assessments of land availability, Flood Risk assessments, Water cycle studies, etc.

Where Local Planning authorities are at different stages of local plan preparation, the NPPG advises that the respective Local Planning Authorities should try to enter into formal agreements, demonstrating their long term commitment to a jointly agreed strategy on cross boundary matters. The key element is that there is sufficient certainty through the agreements that an effective strategy will be in place for strategic matters when the plans are adopted.

The Localism Act states that the duty-to-cooperate:

- Relates to a ‘strategic matter’ defined as sustainable development or use of land that has or would have a significant impact on at least two local planning areas or on a planning matter that falls within the remit of a county council
- Requires that councils and public bodies ‘engage constructively, actively and on an ongoing basis’ in the preparation of development plan documents, and
- Requires councils to consider joint approaches to plan-making.

1.2 Purpose of the report

This report is structured to outline how the duty to cooperate has been met on a strategic issue by strategic issue basis, rather than focusing on individual organisations. The final section of the report does, however, show that all relevant statutory bodies have been sufficiently engaged with and outcomes have been identified throughout the process.
This report does not seek to reproduce all the relevant correspondence in relation to duty-to-cooperate bodies but summarises the processes undertaken and the outcomes achieved. Memorandums of Understanding and other key documents that summarise key outcomes are included in Appendix 1.

This report is in draft form and will be updated when the Plan is submitted to enable updates to be included, including in relation to ongoing discussions and finalising of Memorandums of Understanding and Statements of Common Ground.

1.3 Who are the DtC bodies

The planning authorities to which the duty most directly applies to Aylesbury Vale District Council are listed below:

- Buckinghamshire County Council
- Chiltern District Council
- South Bucks District Council
- Wycombe District Council
- South Oxfordshire District Council
- Cherwell District Council
- South Northamptonshire District Council
- Milton Keynes Council
- Central Bedfordshire District Council
- Dacorum Borough Council

Other authorities that the Council has engaged with under the Duty to Cooperate are:

- Oxfordshire County Council
- Hertfordshire County Council
- Northamptonshire County Council
- Slough Borough Council
- Windsor & Maidenhead District Council
- Wokingham District Council
- Reading District Council
- West Berkshire District Council
- Vale of White Horse District Council
- South Oxfordshire District Council
- West Oxfordshire District Council
- Oxford City Council
- Bedford Borough Council
- Luton Borough Council

The statutory bodies identified in Part 2 of the Town & County Planning (Local Planning) (England) regulations 2012 (as amended) include:

- The Environment Agency
- Historic England
- Natural England
- The Civil Aviation Authority
• The Homes and Communities Agency
• Aylesbury Clinical Commissioning Group
• Chiltern Clinical Commissioning Group
• Office for Rail Regulation
• The Mayor of London
• Transport for London
• Highways England
• Buckinghamshire Thames Valley Local Enterprise Partnership (BTVLEP)
• Buckinghamshire and Milton Keynes Natural Environment Partnership (BMKNEP)

1.4 AVDC overall approach to DtC

The Duty to Cooperate has been an ongoing process since the launch of the Vale of Aylesbury Local Plan in spring 2014. This has been to ensure efficient and productive dialogue with neighbouring authorities as well as the statutory bodies.

The early stages of the process focused on the initial identification of strategic issues, as well as early approaches of all Duty to Cooperate bodies. This involved casting the net wide early on in terms of authorities contacted, as demonstrated in the consultation on the extent of the Housing Market Area. Indeed the definition of the Housing Market Area (HMA) and the Functional Economic Market Area (FEMA) early on was critical to defining the most critical working relationships in terms of other local authorities. As set out in the strategic issues section the HMA and FEMA were identified on a best fit basis to consist of Buckinghamshire. With the Buckinghamshire authorities, the Buckinghamshire Thames Valley Local Enterprise Partnership (BTVLEP) and the South East Midlands Local Enterprise Partnership (SEMLEP) there has been particularly close liaison and joint working through the Bucks Planning Group. This has involved regular meetings at both officer and member level. The work includes joint commissioning of work and studies, and working through strategic issues. The Bucks Planning Group has also been the vehicle for initiating wider discussions with other Duty to Cooperate bodies, for example on issues surrounding health, natural environment, etc.

There has been proactive engagement with other authorities and grouping of authorities on strategic issues, such as seeking to agree the scope of evidence work, sharing and discussing findings, and identifying policy solutions to issues. In addition there has been regular contact through formal emerging consultation stages with all identified Duty to Cooperate bodies. The outcome of this has been to seek to agree outcomes with relevant authorities and bodies in the form of Memorandum of Understandings, correspondence exchanges, and confirm areas of agreement and positions on key issues.
2.0 Strategic Planning Issues

2.1 Identifying these issues

The Strategic Planning Issues Statements are set out below. Not all of these issues have a completed Issues Statement at this stage as the Council is still in the process of meeting the duty which continues until the Local Plan is submitted for examination:

- Housing Market Area / Functional Economic Market Area
- Housing Requirements / OAN
- Housing Supply and Unmet Housing Need
- Housing Delivery
- Economic/ Employment and Retail requirements
- Site Allocations including Garden Town
- Transport
- Education
- Health
- Waste Disposal
- Flood Risk / Water Cycle / Water Quality
- Green Infrastructure and Biodiversity
- Emergency Services
- Utilities
- Open Space and Recreation
- Heritage and Historic Environment
- Gypsy, Traveller and Travelling Showpeople Accommodation
- Green belt

2.2 Structure of the strategic planning issues

- Defining the issue
- Outlining the evidence used to develop the plan’s strategic policies
- Listing the strategic partners engaged and involved in the issue
- Outlining necessary actions, evidence, involvement with strategic partners over the issue
- Noting the outcomes of the actions in relation to strategic policy, and any unresolved issues
- Outlining the ongoing cooperation necessary to manage strategic issue
2.3 Strategic Planning Issues Statement - Defining the Housing Market Area and Functional Economic Market Area (HMA/FEMA)

<table>
<thead>
<tr>
<th>1. Strategic Planning issue</th>
</tr>
</thead>
<tbody>
<tr>
<td>To ensure that the Housing Market Area and Functional Economic Market Area reflect functional linkages between places where people live and work.</td>
</tr>
<tr>
<td>To ensure that the evidence based on housing and employment need is collected in a consistent way across the whole HMA/ FEMA.</td>
</tr>
<tr>
<td>To establish a ‘best fit’ geography for HMAs and FEMAs based on Local Plan areas.</td>
</tr>
</tbody>
</table>

2. Evidence base

- Housing Market Area and Functional Economic Market Areas in Buckinghamshire, March 2015
- Housing Market Area and Functional Economic Market Areas in Buckinghamshire: Technical Appendices, March 2015
- Housing Market Area and Functional Economic Market Areas in Buckinghamshire: Updating the Evidence, June 2016

3. Strategic Partners

Opinion Research Services (ORS) and Atkins were jointly commissioned by the four District Councils in Buckinghamshire (Aylesbury Vale, Chiltern, South Bucks and Wycombe) to identify Housing Market Areas (HMAs) and Functional Economic Market Areas (FEMAs) for the county and surrounding areas.

A full list of stakeholders that were invited to engage with the project is set out in the table at the end of this section.

4. Actions

**Action:**
The Method Statement drawn up for undertaking this project was circulated to the stakeholders set out in Table 1 at the end of this section in September 2014.

**Partners:**
See Strategic Partners above

**Outcome:**
Stakeholders had an opportunity from the outset to influence how the work was undertaken. The original Method Statement is set out in Appendix E of the Housing Market Area and Functional Economic Market Areas in Buckinghamshire: Technical Appendices, March 2015 and the comments received on it included in Appendix F. The methodology was subsequently finalised.

**Date:**
September to November 2014

**Action:**
A workshop was held by the consultants setting out the emerging findings from the project. All of the stakeholders set out at Table 1 were invited to attend the workshop. Table 1 at the end of this section indicates which stakeholders attended the workshop.

**Partners:**
See Strategic Partners above
<table>
<thead>
<tr>
<th>Outcome:</th>
<th>Stakeholders received a copy of the emerging findings from the consultants and had the opportunity to attend a workshop to have the findings explained to them and to ask questions about the approach that has been taken to the work.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Appendix I of Housing Market Area and Functional Economic Market Areas in Buckinghamshire: Technical Appendices, March 2015 sets out the responses to the emerging findings and the consultant’s response to the issues raised.</td>
<td></td>
</tr>
<tr>
<td>Date:</td>
<td>29th September 2014 workshop/ comments received from stakeholders on the emerging findings between September and November 2014.</td>
</tr>
<tr>
<td>Action:</td>
<td>A meeting was held between the district councils in Buckinghamshire and the Royal Borough of Windsor and Maidenhead and Slough Borough Council to discuss the HMA/ FEMA on 16th January 2015</td>
</tr>
<tr>
<td>Partners:</td>
<td>Wycombe District Council, Chiltern District Council, Royal Borough of Windsor and Maidenhead, Slough Borough Council, South Bucks District Council.</td>
</tr>
</tbody>
</table>
| Outcome: | • Agreed that on balance the Central Buckinghamshire HMA/ FEMA comprises Aylesbury Vale District Council, Chiltern District Council and Wycombe District Council and that South Bucks District Council falls within the Berkshire HMA.  
• Opportunity to comment on the Consultation Draft of the ORS/ Atkins findings.  
• Meeting to be arranged by South Bucks with the Greater London Authority to discuss the approach to London HMA and cross-boundary issues. |
| Date: | 16th January 2015 |
| Action: | The report of findings Consultation Draft was sent out to the Stakeholders set out in Table 1 for comments. Responses received are listed in Appendix J of the Housing Market Area and Functional Economic Market Areas in Buckinghamshire: Technical Appendices, March 2015. |
| Partners: | Strategic Partners set out in Table 1 |
| Outcome: | • Opportunity to comment on the Consultation Draft of the document.  
• Comments were received and considered (see aforementioned Appendix J to the final report) |
| Date: | February 2015 |
| Action: | Following the decision by South Bucks and Chiltern District Councils to produce a Joint Local Plan for the two District Council areas, in November 2015, |
an update was commissioned of the above Study from the consultants. This was shared with the stakeholders listed in Table 1 below and the feedback received was considered as part of the report.

Partners:
Strategic Partners set out at Table 1.

Outcome:
- A note was produced in January 2016 which suggested that on balance the consultants considered that a best fit” housing market geography based on Local Plan areas was the most appropriate approach; and the most pragmatically appropriate “best fit” for Chiltern and South Bucks as a single, combined area is as part of the Central Buckinghamshire housing market area: i.e. an area that comprises the local authorities of Aylesbury Vale, Chiltern, South Bucks and Wycombe.
- As the same functional area was identified for the HMA and FEMA, the recommended “best fit” for the FEMA would also be based on the same four local authority areas.

Date:
January 2016

Action:
An Update of the above Study was commissioned from ORS/ Atkins in order to take account of updated data from the 2011 Census.

Partners:
Strategic Partners set out at Table 1.

Outcome:
- An updated report was produced. This showed that the extent of the Central Buckinghamshire functional HMA has extended further into Aylesbury Vale with the majority of the remainder of the district covered by the Milton Keynes functional HMA. Whilst there are other functional HMAs covering parts of Aylesbury Vale (including Banbury, Luton, Oxford and South West Hertfordshire), these areas are all sparsely populated.
- The Aylesbury Vale district continues to fall within 4 Functional HMA’s including in the most part Central Buckinghamshire Functional HMA, Luton Functional HMA, Milton Keynes Functional HMA and Oxford Functional HMA.

As the update did not fundamentally change the overall conclusions on the HMA/FEMA this update was not widely consulted on.

Date:
Jun 2016

5. Outcomes from strategic working

The result of the strategic cooperation was an agreed Housing Market Area that all four District Councils in Buckinghamshire, Buckinghamshire County Council and the Buckinghamshire Thames Valley Local Enterprise Partnership (BTVLEP) agreed. This led to a consistent approach across the whole of the HMA/ FEMA on a range of joint working initiatives. This includes a Housing and Economic Development Needs Assessment (HEDNA) drawn up for the whole of Buckinghamshire (excluding Milton Keynes); a consistent methodology agreed for the Housing and Economic Land Availability Assessment (HELAA) and work on reviewing the Green Belt within Buckinghamshire. (see other sections of the
Strategic Planning Issues Statements) and ultimately.

The HMA/ FEMA work formed the geographic basis for an initial MoU (August 2015) between the authorities of Wycombe, Aylesbury Vale, Chiltern and South Bucks Districts, the Thames Valley Local Economic Partnership and Buckinghamshire Council covering the distribution of housing, employment and retail needs within the area.

One issue that remains unresolved relates to the inclusion of South Bucks within the HMA/ FEMA. As set out above, the initial HMA/ FEMA Study concluded that the South Bucks District was more closely aligned with the Reading and Slough HMA and not the Central Buckinghamshire HMA.

As is set out above, the reason that South Bucks was included within the Buckinghamshire HMA was because a decision had been taken in November 2015 to prepare a joint Local Plan between South Bucks and Chiltern Districts. The consultants ORS/ Atkins clearly state in their June 2016 report that “These “best fit” groupings do not change the actual geography of the functional housing market areas that have been identified – they simply provide a pragmatic arrangement for the purposes of establishing the evidence required, as suggested by the CLG advice note and reaffirmed by the PAS technical advice note.

The outcomes of the strategic working may be summarised as follows:

- Agreement between the four Buckinghamshire Districts and the Buckinghamshire Thames Valley Local Enterprise Partnership in the Bucks wide MOU (13.7.17) that on a best fit basis to plan areas the Bucks HMA and FEMA consists of Aylesbury Vale, Chiltern, South Bucks and Wycombe Districts.
- Similar agreement with Buckinghamshire County Council on the extent of the HMA and FEMA on a best fit basis (draft).
- Agreement with Royal Borough of Windsor and Maidenhead (RBWM) that RBWM and WDC are in separate but adjoining housing market areas (see MOU between WDC and RBWM dated 13.2.17
- Signed MoU with South Oxfordshire dated 6.9.2017 also agreeing the same.

6. Ongoing cooperation

The main ongoing issue in relation to the Housing Market Area relates to the issue of whether South Bucks should, on a best fit basis be considered to be part of the Bucks or Berks housing market area and indeed the nature of the Berks housing market area. There are existing mechanisms to consider these issues. Within Bucks this is through the Bucks Planning Group, but there are also inter-authority meetings that take place at officer and, as appropriate, member level with other authorities. Recently these have tended to focus on Slough Borough Council, South Bucks District Council, Buckinghamshire County Council and Wycombe District Council.
### 1. Strategic Planning issue

To determine the objectively assessed housing need for the Housing Market Area and for the individual constituent local authorities to underpin the plan making.

### 2. Evidence base

- Central Buckinghamshire Housing and Economic Development Needs Assessment – Consultation Draft (Oct 2015)
- Buckinghamshire Housing and Economic Development Needs Assessment – Consultation Draft (Jan 2016)
- Buckinghamshire Housing and Economic Development Needs Assessment Update (Dec 2016)
- Buckinghamshire Housing and Economic Development Needs Assessment Addendum (Sept 2017)

### 3. Strategic Partners

Aylesbury Vale District Council (AVDC)  
Chiltern District Council (CDC)  
South Bucks District Council (SBDC)  
Buckinghamshire County Council (BCC)  
Buckinghamshire Thames Valley Local Enterprise Partnership (BTVLEP)

This work was overseen by the Bucks Planning Group, a Cabinet Member level group involving all of the above authorities/organisations. A steering group consistent of the District Councils, BCC and the BTVLEP.

In addition a wide range of other partners/stakeholders have been engaged in the work, including all neighbouring authorities and some authorities beyond immediate neighbours.

### 4. Actions

**Action:** Prior to the joint commissioning of the HEDNA in 2015, at the outset of the Local Plan preparation process WDC discussed with the other Buckinghamshire authorities the scope for the preparation of a joint Buckinghamshire Strategic Housing Market Area (SHMA).

**Partners:** Aylesbury Vale District Council (AVDC), Buckinghamshire County Council (BCC), Chiltern District Council (CDC), South Bucks District Council (SBDC)

**Outcome:**
- There was not support at this stage for a joint SHMA due to where other authorities were at in their plan making processes. WDC therefore commissioned its own SHMA to try to make progress with its new Local Plan.

**Date:** December 2012

**Action:** Following on from the process of identifying the Housing Market Area (see separate strategic issues statement above) ORS and Atkins were jointly commissioned by the Bucks Districts to undertake a Housing and Economic Development Needs Assessment. A steering group was also established involving the Bucks Districts, the County Council and BTVLEP. The first stage involved consultation with stakeholders on the methodology including all adjoining local authorities and some beyond.
Partners: Aylesbury Vale District Council (AVDC), Buckinghamshire County Council (BCC), Chiltern District Council (CDC), South Bucks District Council (SBDC), Buckinghamshire Thames Valley Local Enterprise Partnership (BTVLEP) In addition the following authorities were consulted on the methodology – Cherwell District Council, West Northamptonshire Council (Joint Planning Unit), South Northamptonshire Council, Milton Keynes Council, Central Bedfordshire Council, Bedford Borough Council, Luton Borough Council, Dacorum Borough Council, Three Rivers District Council, Watford Borough Council, South Bucks District Council, Runnymede Borough Council, Slough Borough Council, Royal Borough of Windsor and Maidenhead, Bracknell Forest Council, Wokingham Borough Council, West Berkshire Council, Reading Borough Council, South Oxfordshire District Council and Oxford City Council.

Outcome: Methodology for the HEDNA finalised, having regard to the outcome of the engagement with partners/stakeholders

Date: April/ May 2015

Action: Undertaking the needs assessment to determine the draft OAN and consulting on draft findings. This was initially a Central Bucks HEDNA Consultation Draft (i.e. excluding South Bucks) (October 2015), but following the decision of South Bucks and Chiltern to prepare a joint plan (November 2015) and the subsequent adjustment to the Housing Market Area, a Bucks HEDNA Consultation Draft was published. Further scrutiny of this draft report took place as part of consultation on the draft Wycombe Local Plan (Jun-Aug 2016).

Partners: Aylesbury Vale District Council (AVDC), Buckinghamshire County Council (BCC), Chiltern District Council (CDC), South Bucks District Council (SBDC), Buckinghamshire Thames Valley Local Enterprise Partnership (BTVLEP) Wide consultation with wider group of partners (Oct 2015) and further scrutiny as part of the consultation on the Draft Local Plan (June 2016).

Outcomes: • A draft assessment of objectively assessed housing need agreed at a technical level between the Bucks District Councils; • Inputs provided by a number of authorities and other partners into the assessment that could be taken into account in finalising the assessment; • London Mayor welcomed the approach to assessing needs set out in the draft HEDNA.

Date : October 2015 – Summer 2016

Actions: Update to HEDNA jointly commissioned to take account of new demographic data, comments on consultation draft HEDNA reviewed and comments taken into account, with responses set out in the Final HEDNA Update report appendices (Dec 2016), and HEDNA update finalised and published.

Partners: Partners: Aylesbury Vale District Council (AVDC), Buckinghamshire County Council (BCC), Chiltern District Council (CDC), South Bucks District Council (SBDC), Buckinghamshire Thames Valley Local Enterprise Partnership (BTVLEP) – process overseen by Bucks Planning Group.

Outcomes:
- An up to date assessment of the objectively assessed need for housing agreed at a technical level across the Bucks districts, taking account as appropriate feedback from consultation on the draft HEDNA.

Date: Summer 2016 – Dec 2016

Actions: Joint commissioning of a HEDNA Addendum (see also employment issues section) – to correct an error and to clarify the position in relation to affordable housing need; Engagement with the BTVLEP Board on final position and securing political agreement to the final housing OAN across the housing market area by means of a Bucks wide MOU.

Partners: Aylesbury Vale District Council (AVDC), Buckinghamshire County Council (BCC), Chiltern District Council (CDC), South Bucks District Council (SBDC), Buckinghamshire Thames Valley Local Enterprise Partnership (BTVLEP)

Outcome: An MOU between AVDC, CDC, SBDC, WDC and BTVLEP agreeing the objectively assessed need figures for the HMA and each District – July 2017. Figures also agreed by BCC.

Date: April to Sept 2017

5. Outcomes from strategic working

The outcomes of the strategic working may be summarised as follows:

Agreement of the Buckinghamshire authorities and the
- Buckinghamshire Thames Valley LEP to the objectively assessed housing needs for each district in the HMA and for the HMA as a whole; (as set out in respective MOUs/SOCGs);
- Wider sharing with other authorities/stakeholders of the housing OAN position and addressing of technical issues where appropriate;
- Approach to assessing housing needs welcomed by the Mayor of London.

These key outcomes, together with the position reached on housing supply/unmet needs (see separate section of the report below) have formed the underpinning basis for the Plan, notably the establishment of a clear and evidence led housing target for the District set out in the Core Policies of the Plan.

6. Ongoing cooperation

This issue will be monitored and kept under review as part of the ongoing cooperative working arrangements through the Bucks Planning Group. However it should be noted that the Government’s methodology for assessing the housing OAN is likely to change in 2018 and it is AVDC’s intention to submit its plan for examination by 31st March 2018 and hence have the Plan examined on the basis of the current OAN methodology and hence the agreed position on the OAN. The implications of the Government’s new methodology for OAN calculation is therefore a matter for Plan review.
1. Strategic Planning issue
To assess the housing supply of the District, consider whether that meets the identified objectively assessed need for housing and consider how unmet housing needs might be addressed.

2. Evidence base
- Joint HELAA methodology (Central Buckinghamshire Housing and Economic Land Availability Assessment Methodology, May 2015)
- AVDC HELAA version 2 - Final Draft (October 2015)
- AVDC HELAA version 3 - Final Draft (May 2016)
- AVDC HELAA version 4 - Final Draft (January 2017)

3. Strategic Partners
Aylesbury Vale District Council (AVDC), Buckinghamshire County Council (BCC), Chiltern District Council (CDC), South Bucks District Council (SBDC), Buckinghamshire Thames Valley Local Enterprise Partnership (BTVLEP) - working through the Bucks Planners Group.
Wider stakeholder and public engagement through consultations at key plan preparation stages and on draft HELAA at times and one to one engagement as appropriate.

4. Actions
Action: Following an earlier call for sites, initial identification and consultation on potential housing supply and potential strategic and site options to help meet identified housing need at the time, as part of Wycombe Local Plan Options consultation document (Feb 2014). Partners: Wide ranging sharing of position, including with all Duty to Cooperate bodies, as well as the public. Outcome:
- A wide range of inputs into the consideration of housing land supply
- Early awareness of a potential shortfall of housing supply against the early understand of housing need.

Date: Spring 2014
Action: Preparation and agreement of a joint methodology for district level Housing and Economic Land Availability Assessments. Partners: Aylesbury Vale District Council (AVDC), Buckinghamshire County Council (BCC), Chiltern District Council (CDC), South Bucks District Council (SBDC), Buckinghamshire Thames Valley Local Enterprise Partnership (BTVLEP), Environment Agency, Natural England, Historic England (formerly known as English Heritage). Outcome:
- Agreed HELAA methodology between WDC, AVDC and CDC, May 2015 as a common basis for preparing HELAAs in each authority/plan area.
- In November 2015 CDC and SBDC made the decision to produce a joint Local Plan, subsequently at this stage South Bucks were included in the joint HELAA methodology. Date: May 2015

Action: Discussions amongst the Buckinghamshire authorities and BTVLEP about the approach and programme for joint working, potential for unmet housing needs and the principles for addressing it.
Partners: Aylesbury Vale District Council (AVDC), Buckinghamshire County Council (BCC), Chiltern District Council (CDC), South Bucks District Council (SBDC), Buckinghamshire Thames Valley Local Enterprise Partnership (BTVLEP)
Outcome:
Joint MOU (August 2015) (see Appendix 1) agreed between AVDC, BCC, CDC, WDC and BTVLEP which:
- Established the principle that housing need should be met first within each individual district and then if that is not possible across the housing market area, and only if needs could not be met in the HMA
would areas outside of the HMA be considered;

- Recognised that there was likely to be unmet housing needs in Wycombe and Chiltern Districts, and that the resulting unmet need would be addressed in the Vale of Aylesbury Local Plan.
- Agreed to joint working on housing supply/capacity assessment with the aim to try to agree supply/capacity – this included acting as critical friends to each other on HELAA and recognising there may need to be further capacity work, including on Green Belt review part 2 assessments.

Date: August 2015, MOU updated in Feb 2016 to include South Bucks District Council.

**Action:** Undertaking detailed work to consider the most appropriate scale of growth at Princes Risborough.

**Partners:** Buckinghamshire County Council – highway, education authority, lead local flood authority and other services including Adult Social Care, BTVEP, Environment Agency, Natural England, Historic England, Princes Risborough Steering Group - elected members from all tiers of local government, plus local residents’ association, representatives of business and sport in the town, the local secondary school including pupils, and the Risborough Area Partnership, various other stakeholders – for workshops those listed above, plus the Aylesbury Clinical Commissioning Groups, local GP surgery and Thames Water.

**Outcomes:**

- A “preferred option” set out in the draft Princes Risborough Town Plan of up to 2,000 – 2,500 homes
- Feedback from a range of bodies and the public on the scale of growth for further consideration, including from a range of Duty to Cooperate bodies.

**Date:**

- Work undertaken from early 2014 culminating in consultation on the draft Princes Risborough Town Plan, Feb-Mar 2016

**Action:** Preparation of draft HELAA, sharing draft HELAA with Bucks districts first for comment as part of critical friend role.

**Partners:** Aylesbury Vale District Council (AVDC), Chiltern District Council (CDC), South Bucks District Council (SBDC)

**Outcome:**

- Feedback received from AVDC and CDC/SBDC. Resulted in clarification on a number of methodology points, including windfall and density assumptions. Agreement that the methodology had been followed. Date: November 2015

**Action:** Consultation on draft Wycombe District Local Plan (Jun 2016), feeding in ongoing work on the HELAA following the consultation on the draft, the outcomes from the Green Belt Part 2 assessment and other studies.

**Partners:** This was an extensive consultation involving all Duty to Co-operate bodies, other stakeholders and the public.

**Outcome:**

- The feedback from the consultation was extensive and wide ranging – from local public opposition to the scale of housing growth proposed and individual sites, to concern from some authorities about the scale of unmet housing need and how it would be addressed.
- A detailed review/critique of the Council’s housing land supply position at the time was submitted by Aylesbury Vale District Council expressing concern about the scale of the identified unmet need.

**Date:** Jun – Aug 2016

**Action:** Scrutiny and review of the housing land supply position in response to the critique submitted by Aylesbury Vale District Council – this was
undertaken with AVDC and also shared with CDC/SBDC, including a joint workshop.

Partners: Aylesbury Vale District Council (AVDC), Chiltern District Council (CDC), South Bucks District Council (SBDC)

Outcome:
- A formal response (Nov 2016) by WDC to AVDC on the issues raised in the critique, including a review and update of the housing land supply position. This identified a housing capacity of 11,200 homes against a revised housing OAN of 12,900.
- An MOU (Dec 2016) (see Appendix 1) signed between AVDC and WDC agreeing that based on the currently available evidence the unmet need was 1,700 and that this would be accommodated in the Vale of Aylesbury Local Plan.

Date: Sept – Dec 2016

Action: Review of the unmet housing needs position with other neighbouring authorities outside of the Bucks Housing Market Area, notably Royal Borough of Windsor and Maidenhead (RBWM) South Oxfordshire (S Oxon), Mayor of London and Slough Borough Council (SBC).

Although not an adjoining authority, clarification was sought from Slough Borough Council (SBC) on the issue of unmet housing needs. SBC had not responded to the consultation on the draft Wycombe Local Plan (Jun 2016) but had undertaken an options consultation on their Local Plan identifying significant unmet housing need and different options for how it might be met. WDC shared in Dec 2016 its position on housing land supply/capacity following completion of the review process with AVDC and indicated to SBC that it had no capacity to accommodate unmet housing needs from SBC. More recent assurances have also been provided to SBC about how unmet affordable housing arising in the south of Bucks will be addressed in Aylesbury Vale (see Bucks-wide MOU, July 2017 below). The above actions in relation to SBC have involved various meetings and e mail exchanges which are ongoing, often also involving BCC and SBDC.

Partners: Royal Borough of Windsor and Maidenhead, South Oxfordshire, Slough Borough Council, South Bucks District Council, Buckinghamshire, Oxfordshire County Council, Mayor of London.

Outcome:
- RBWM – an MOU was agreed (February 2017) (See Appendix 1) between RBWM and WDC which agreed that neither authority was asking the other authority to accommodate unmet housing needs.
- SODC – an MOU was agreed (Sept 2017) (See Appendix 1) which agreed that neither authority was asking the other authority to accommodate unmet housing needs.
- Mayor of London - Confirmation has been received indicating that the Mayor has no outstanding strategic issues/concerns.
- The Council to date has received no requests from neighbouring authorities outside of the Bucks HMA (or authorities beyond that are not neighbouring) to accommodate unmet housing needs.
- SBC – WDC is awaiting clarification of SBC position in the light of WDC’s evidence on capacity and re-assurances on how affordable housing need will be accommodated in the Bucks HMA.

Date: September 2016 – September 2017

5. Outcomes from strategic working

The main outcomes are:
- Agreement between the Bucks districts and BTLEP on the housing capacities and scale of unmet need for the 4 Bucks districts and
agreed scale of unmet housing need in Wycombe, Chiltern and South Bucks districts, and agreement that the Vale of Aylesbury Local Plan should accommodate that unmet need;

- Agreement from BCC on the scale of unmet need in Wycombe District
- Agreement from BCC on the scale of unmet need in Chiltern and South Bucks
- Agreement on the approach to be taken to accommodate unmet affordable housing need within the HMA

### 6. Ongoing cooperation

The Council will continue to seek clarification on the position of other authorities outside of the HMA in respect of unmet housing needs, including Slough Borough Council, and will continue to cooperate to secure appropriate outcomes. This issue will be monitored and kept under review as part of the ongoing cooperative working arrangements through the Bucks Planning Group. The Bucks wide MOU (July 2017) indicates that the Bucks districts and BTVLEP will work cooperatively regarding issues of deliverability to ensure delivery of new housing and to share monitoring data on housing delivery at least annually to ensure up to date information is available across the 'best fit' Housing Market Area.

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### 2.6 Strategic Planning Issues Statement – Housing Delivery

#### 1. Strategic Planning issue

To examine housing delivery across the whole of Buckinghamshire and in particular major sites and market capacity for new homes in Aylesbury Vale District. A secondary issue is to explore if there is a ceiling on the level of residential development that could be achieved in the District.

#### 2. Evidence base

Housing Delivery Study for Buckinghamshire – Final Report, August 2017

#### 3. Strategic Partners

Wycombe District Council  
Chiltern District Council  
South Bucks District Council

#### 4. Actions

An agreed Housing Delivery report including the likely level of housing delivery within the plan period at the proposed Princes Risborough Expansion Area.

- A Bucks wide MOU was agreed (July 2017) by AVDC, CDC, SBDC, WDC and BTVLEP which agreed the housing capacity/distribution across the Bucks HMA including the level of unmet housing need to be accommodated in the Vale of Aylesbury Local Plan. For Wycombe District it indicates a capacity of 10,925 dwellings and unmet need of 2,275. The unmet need figure for Wycombe has also been agreed by BCC.

- The MOU also sets out the approach to accommodating unmet affordable housing need in the Vale of Aylesbury Local Plan.

- Final Wycombe HELAA published (Sept 2017), incorporating the findings of the Housing Delivery Study.

#### 5. Outcomes from strategic working

The main outcomes:

- Agreement between the Bucks districts and BTVLEP on the housing
capacities and scale of unmet need for the 4 Bucks districts and agreed scale of unmet housing need in Wycombe, Chiltern and South Bucks districts, and agreement that the Vale of Aylesbury Local Plan should accommodate that unmet need;

6. Ongoing cooperation

The task of moving from a certain level of housing delivery to a permanently higher level of delivery is a major challenge given the complexity of the housing development process and the number of different parties involved. Aylesbury Vale’s Local Plan is planning for a step change in housing delivery from its current delivery levels albeit already delivering high volumes of new homes.

For this to be realised a wide number of actions need to be taken by different partners, although the new VALP will provide the benefit of greater certainty. Developer enthusiasm for development, which is in evidence in Aylesbury Vale, also suggests that delivery across a wider range of sites should improve overall delivery.

Chiltern, South Bucks and Wycombe Districts face their own challenges on bringing forward enough land to make a substantial contribution to the OAN for Buckinghamshire. In these authorities demand is strong; the challenge is bringing forward development sites to meet the demand. Close monitoring will need to take place with any uplift from Chiltern and South Bucks OAN as a planning authority likely to submit their Local Plan post March 31st 2018 and thus falling under the revised OAN calculation methodology. Further cooperation and dialogue will need to take place to discuss option on how to meet this potential further growth.

2.7 Strategic Planning Issues Statement – Economic/Employment and Retail requirements

1. Strategic Planning issue

To seek to meet the needs of businesses, retail and employment to 2033 for the District and work with other authorities, BTYCLEP and SEMLEP to consider how needs can be met across the Bucks FEMA.

To secure a broad balance of uses and to assist to reduce the need to travel for employment needs.

2. Evidence base

- Central Buckinghamshire Housing and Economic Development Needs Assessment – Consultation Draft (Oct 2015)
- Buckinghamshire Housing and Economic Development Needs Assessment – Consultation Draft (Jan 2016)
- Buckinghamshire Housing and Economic Development Needs Assessment Update (Dec 2016)
- Buckinghamshire Housing and Economic Development Needs Assessment Addendum (Sept 2017)
- Aylesbury Town Centre Growth Opportunity Assessment Study (Nov 2016)
- Aylesbury Vale Economic Development Strategy 2016-2033 (Sep 2016)
- GL Hearn Final Employment Land Review Update Final Report, (Sep 2012)
- Aylesbury Vale Retail Impact Thresholds, June 2017

3. Strategic Partners

Wycombe District Council, Buckinghamshire County Council (BCC), Chiltern District Council (CDC), South Bucks District Council (SBDC), Buckinghamshire Thames
4. Actions

**Action**: Following on from the process of identifying the Functional Economic Market Area, ORS and Atkins were jointly commissioned by the Bucks Districts to undertake a Housing and Economic Development Needs Assessment. A steering group was set up involving the Bucks Districts, County Council and BTVLEP. The objective of the Buckinghamshire HEDNA was to establish the Objectively Assessed Need (OAN) for housing for the Buckinghamshire HMA and to assess the future full, objectively assessed, economic needs. The first stage involved consultation with stakeholders on the methodology including all adjoining local authorities and some beyond.

Part of this work involved an economic workshop as part of the sharing of the initial findings of the HEDNA work. A summary of key points from this Workshop is set out in the HEDNA Appendices document (Appendix B). It also included contacting agents by telephone to discuss in more detail the economic market in Buckinghamshire.

**Partners**: Aylesbury Vale District Council (AVDC), Buckinghamshire County Council (BCC), Chiltern District Council (CDC), South Bucks District Council (SBDC), Buckinghamshire Thames Valley Local Enterprise Partnership (BTVLEP)

In addition the following authorities were consulted on the methodology – Cherwell District Council, West Northamptonshire Council (Joint Planning Unit), South Northamptonshire Council, Milton Keynes Council, Central Bedfordshire Council, Bedford Borough Council, Luton Borough Council, Dacorum Borough Council, Three Rivers District Council, Watford Borough Council, South Bucks District Council, Runnymede Borough Council, Slough Borough Council, Royal Borough of Windsor and Maidenhead, Bracknell Forest Council, Wokingham Borough Council, West Berkshire Council, Reading Borough Council, South Oxfordshire District Council and Oxford City Council.

**Outcome**: Methodology for the HEDNA finalised, having regard to the outcome of engagement with partners/stakeholders.

**Date**: April/ May 2015

**Action**: Undertaking the needs assessment to determine the draft OAN and consulting on draft findings. This was initially a Central Bucks HEDNA Consultation Draft (i.e. excluding South Bucks) (October 2015), but following the decision of South Bucks and Chiltern to prepare a joint plan (November 2015) and subsequent adjustment to the Functional Economic Market Area, a Bucks HEDNA Consultation Draft was published. Further scrutiny of this draft report took place as part of consultation on the draft VALP (7 July to 5 September 2016).
**Partners:** Aylesbury Vale District Council (AVDC), Buckinghamshire County Council (BCC), Chiltern District Council (CDC), South Bucks District Council (SBDC), Buckinghamshire Thames Valley Local Enterprise Partnership (BTVLEP) Wide consultation with wider group of partners (Oct 2015) and further scrutiny as part of the consultation on the Draft Local Plan (7 July to 5 September 2016).

**Outcome:** A draft assessment of objectively assessed need agreed at a technical level between the Bucks District Councils; Inputs provided by a number of authorities and other partners into the assessment that could be taken into account in finalising the assessment.

**Date:** October 2015 – Summer 2016

**Actions:** Update to HEDNA jointly commissioned to take account of new demographic data, comments on consultation draft HEDNA reviewed and comments taken into account, with responses set out in the Final HEDNA Update report appendices (Dec 2016), and HEDNA update finalised and published.

**Partners:** Aylesbury Vale District Council (AVDC), Buckinghamshire County Council (BCC), Chiltern District Council (CDC), South Bucks District Council (SBDC), Buckinghamshire Thames Valley Local Enterprise Partnership (BTVLEP) – process overseen by Bucks Planning Group.

**Outcomes:** An up to date assessment of objectively assessed needs agreed at a technical level across the Bucks districts, taking account as appropriate feedback from consultation on the draft HEDNA.

**Date:** Summer 2016 – Dec 2016

**Actions:** Preparation of joint information on a common basis of employment land supply information (B use classes) across the FEMA, including a common basis for estimating potential employment land losses.

**Partners:** Aylesbury Vale District Council (AVDC), Buckinghamshire County Council (BCC), Chiltern District Council (CDC), South Bucks District Council (SBDC), Buckinghamshire Thames Valley Local Enterprise Partnership (BTVLEP)

**Outcomes:** A jointly agreed spreadsheet of employment land supply for the 3 local plan areas in Bucks to inform policy decisions on how employment land needs might be met across the FEMA.

**Date:** Initial work in Spring/Summer 2016. Main work in 2017. Spreadsheet agreed July 2017 and incorporated into Bucks HEDNA Addendum Sept 2017 (see below).

**Actions:** Joint commissioning of a HEDNA Addendum (see also housing issues section) to provide further analysis on the employment land supply requirement, in light of market intelligence on the commercial property market and further economic forecast. Engagement with the BTVLEP Board on final position and securing political agreement to the final OAN across the HMA/Functional Economic Market Area by means of a Bucks wide Memorandum of Understanding.

**Partners:** Aylesbury Vale District Council (AVDC), Buckinghamshire County Council (BCC), Chiltern District Council (CDC), South Bucks District Council
(SBDC), Buckinghamshire Thames Valley Local Enterprise Partnership (BTVLEP)

**Outcome:** A Memorandum of Understanding (July 2017) between AVDC, CDC, SBDC, WDC and BTVLEP acknowledges that the HEDNA Addendum identifies a mismatch between approaches to assessing economic needs based on demand and labour supply forecasts, and those based on market considerations and past take up, including differing conclusions on the need for different “B” uses and that this creates uncertainties in planning ahead. The MoU agrees the following:

- the ‘best fit’ Functional Economic Market Area consists of Aylesbury Vale, Chiltern, South Bucks and Wycombe Districts.
- Plans should reflect the uncertainties in relation to future economic growth by adopting a precautionary and flexible approach to economic development, including ensuring allocations are flexible to adjust to changes in the market;
- Councils should monitor economic activity and market trends, and address any implications in reviews of local plans as necessary and;
- the overall approach across the FEMA broadly delivers sufficient land for economic growth taking into account a range of factors including an element of redistribution of growth from the three southern districts into Aylesbury Vale to take account of their shortfalls due to their constrained nature.
- the district councils will undertake retail studies to determine the need for retail development within their areas. The councils will consult with regard to the content of the studies in relation to their local plans at each consultation stage. Recognise that the nature of retail development is such that it cannot be 'exported' to a neighbouring authority because retail catchments are generally on a smaller geographical scale to housing and the needs for B class employment and it is inappropriate to 'export' retail needs.

**Date:** April to Sept 2017

**5. Outcomes from strategic working**

Agreement on economic forecasts and the approach to addressing economic needs in respective plans, including recognition that shortfalls in employment land (overall, rather than category specific which ) across the FEMA could be accommodated in Aylesbury Vale – detail is set out in the HEDNA Addendum and the overall approach agreed in Bucks wide MOU between AVDC, CDC, SBDC, WDC and BTVLEP, July 2017. BCC accept this position whilst considering this is a matter primarily for the Districts.

- An approach that ensures that sufficient employment land (for B uses) is available across the FEMA to meet forecast demand for the plan period.
- Agreement amongst Bucks Districts and BTVLEP that retail issues are essentially a more localised issue due to the nature of retail catchments and it is not appropriate to “export” retail needs to other authorities.

These outcomes have informed the strategic approach and detailed policies in the draft Local Plan employment and retail sections.

**Retail provision expected to come forward over the plan period**

**Employment land provision expected to come forward over the plan period**

**6. Ongoing cooperation**

Continued dialogue with FEMA partners and BTVLEP and SEMPLEP to ensure sufficient and correct mix of employment opportunities is met to accord with future population and economic forecasts
2.8 Strategic Planning Issues Statement – Transport

1. Strategic Planning issue

**Define the issue**

Identify the transport impacts of growth proposed in the District in the context of the wider growth for Buckinghamshire and any existing or proposed strategic transport projects

- To assess and agree appropriate transport interventions with relevant agencies and agree the means by which these are to be delivered
- To assess the overall impacts of the options for distribution of growth across the Bucks Housing Market Area, and test the effectiveness of options for strategic transport interventions in VALP.
- To identify any cross-border effects of traffic growth relating to planned growth scenarios for the Bucks HMA, in the context of proposed growth in VALP
- To assess the impacts of proposed Local Plan sites within the VALP on the transport network, and test the effectiveness of local transport interventions.
- Agreement over, and delivery of, preferred transport interventions

2. Evidence base

**What is the evidence used to develop the LP’s strategic policies?**

- Buckinghamshire countywide Local Plan modelling report (phase 1), July 2016
  - Buckinghamshire countywide Local Plan modelling report (phase 2), March 2017
  - Buckinghamshire countywide Local Plan modelling report (phase 3), August 2017
  - Wycombe Local Plan sites modelling, May 2017
  - Aylesbury Transport Study, January 2017
  - Buckingham Transport Study, January 2017
  - Highways Development Management advice from Buckinghamshire County Council.

3. Strategic Partners

- Buckinghamshire County Council (BCC)
- Buckinghamshire Thames Valley LEP (BTVLEP)
- South East Midlands LEP (SEMLEP)
- Wycombe District Council (AVDC)
- Chiltern District Council (CDC)
- South Bucks District Council (SBDC)
- Milton Keynes Council (MKC)
- Central Bedfordshire Council (CBC)
- South Oxfordshire District Council (SODC)
- Oxfordshire County Council
- Hertfordshire County Council
- Highways England
- Network Rail
- Chiltern Rail

4. Actions
5. **Outcomes from strategic working**

An agreed county-wide evidence base for traffic impacts, common to the four Local Planning Authorities and the County Highway Authority in Buckinghamshire.

Strategic impacts and strategic transport interventions identified and agreed with BCC for Aylesbury Garden Town:

Cross-border traffic flows have been used to inform discussions with neighbouring authorities such as South Oxfordshire District Council / Oxfordshire County Council, Milton Keynes Council on potential cross-border traffic impacts.

Principles of individual sites informed by local transport testing, leading to development requirements for transport mitigations and interventions which have been agreed with BCC as the local highway authority.

AVDC and Highways England have agreed that there are no issues with the impact of growth on the strategic road network.

6. **Ongoing cooperation**
AVDC is in active and positive discussions with relevant bodies to achieve Memoranda of Understanding / Statements of Common Ground on strategic transport issues:
- Buckinghamshire County Council (BCC)
- Oxfordshire County Council (OCC)
- Network Rail
Relevant MoUs/SoCGs set out arrangements for the establishment of joint delivery teams for key projects, and necessary monitoring arrangements.
- Discussions with Highways England are usually undertaken jointly with BCC and the BT Viveja, using a consistent team of personnel across the authorities.
- AVDC and BCC will work closely together alongside their partners on finding solutions to improve transport connectivity between the Thames Valley and the South East Midlands, through Buckinghamshire;
- AVDC and BCC will work closely and collaboratively together in the future to ensure the delivery of infrastructure to support the urban Aylesbury Garden Town.
Ongoing discussions with BCC take place through a number of forums: regular joint Cabinet Member meetings; regular senior officer meetings; technical level meetings and workshops; and through the wider Bucks Planning Policy Officer Group and Bucks Planning Group.

2.9 Strategic Planning Issues Statement – Health

1. Strategic Planning issue
Overall the issue is to identify the primary health impacts of growth proposed in the District and to assess and agree appropriate interventions and agree the means by which these are to be delivered.

2. Evidence base
What is the evidence used to develop the LP’s strategic policies?
Responses and engagement by NHS Property Services and Aylesbury Vale CCG and Milton Keynes CCG since the start of 2017 taking account of growth scenarios put forward by AVDC.
The Council have also developed policies to ensure improved green infrastructure, open space and opportunities for active travel and will make provisions to introduce a Health Impact Assessment. These improvements can make a significant contribution to physical and mental health, and hence overall wellbeing of residents.

3. Strategic Partners
List of bodies engaged with (details of each, make up and constitution etc, to be listed in appendix 3)
- AVDC
- BCC
- NHS Property Services
- Aylesbury Vale CCG
- Milton Keynes CCG

4. Actions
Since March 2017 AVDC have met with the CCG and have provided opportunities for the CCG to make contributions and provide information on health requirements as a result of the proposed growth and patient numbers.
Officers met with representatives from Aylesbury Vale CCG on the 13th March, 11th September to collaborate further on the information supplied and their response. This has led to formal representations from the CCG regarding the VALP

**Action:** Consultation on the draft Local Plan and CCG consultation response

**Partners:** Chiltern Clinical Commissioning Group

**Outcome:**
- The CCG set out updated information on primary health care needs in the District which has been used to update the latest version of the IDP and in CIL spending decision by the Council.

**Date:** June to November 2016

### 5. Outcomes from strategic working

The response from the NHS to the emerging growth proposals set out by AVDC fed into a supporting document for the VALP – the IDP which has helped identify additional services requirements throughout the plan period. The response set out that growth options would generate a number of additional requirements from GP expansions to new facilities including opportunities for collocating services. It was noted that as the Local Plan process was to move forward further work would be undertaken to ascertain which GP surgeries should and could be expanded to cater for the proposed development growth.

### 6. Ongoing cooperation

Continuing to liaise with the CCG and their estates team on service provision on a site specific and strategic basis.

Aylesbury Vale CCG have had specify input in to the proposals at Berryfields, Kingsbrook and more recently South West Aylesbury.

Milton Keynes CCG has had input in to the Salden Chase proposal in South West MK where the provision of a site resaved for a 6 GP surgery

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### 2.10 Strategic Planning Issues Statement – Flood Risk/Water Cycle and Water Quality

#### 1. Strategic Planning issue

- Ensuring development levels in the VALP can be accommodated without putting users of the site and the wider area at risk of flooding.
- To assess the impact of climate change on flood risk in the district.
- To pass the sequential test on flood risk and show there are no other sites with a lesser risk of flooding that accommodate the required growth.
- To assess if the water cycle infrastructure and resources can cope with the identified levels and locations of growth and if not what enhancements might be required and how they can be provided.

#### 2. Evidence base

- Aylesbury Vale SFRA Level 1 (May 2017)
- Aylesbury Vale SFRA Level 2 (May 2017)
- Aylesbury Vale Water Cycle Study Phase 1 (Feb 2017)
- Aylesbury Vale District Flood Risk Sequential Test - version 3.0 (September 2017)

#### 3. Strategic Partners
4. Actions
How have you worked collaboratively with your partners?
What actions did you take to manage the strategic issue?
Was there any joint evidence developed e.g. SHMA? Who was involved?
Include timescales for the evidence in an annex to demonstrate how and
when key decisions were made (appendix 2).

Stakeholder group established for SFRA and Water Cycle Studies and
meetings took place (Consultant JBA, AVDC, Bucks CC, the EA, Anglian
Water, Thames Water, Bedford Internal Drainage Board)

- Stakeholder Meeting 9 February 2016 (intention to prepare SFRA and
  Water Cycle evidence for VALP) Z:\001VALP\Evidence &
  studies\SFRA\Advisory Panel\Meeting 9 February 2016
- Stakeholder Meeting on project inception/methodology – 12 May 2016
  (SFRA and Water Cycle) Z:\001VALP\Evidence &
  studies\SFRA\Anglian meeting
- Stakeholder comments – SFRA studies – 11 November 2 & 5
  December 2016 Z:\001VALP\Evidence & studies\SFRA\LEVEL 2\Draft
  report received 17 11 2016
- Stakeholder Comments – December 2016 (Water Cycle)
- Stakeholder Meeting 10 January 2017 Z:\001VALP\Evidence &
  studies\SFRA\Meeting Jan 2017
- Stakeholder Meeting 13 October 2016 (Level 2 SFRA)
  Z:\001VALP\Evidence & studies\SFRA\Meeting October 2016
- Sequential Test – methodology – meeting 13 June 2017
  Z:\001VALP\Evidence & studies\SFRA\Sequential and exception
tests\ST FIRST DRAFT
- Sequential Test v1.0 – comments received 18.07.17, 26.07.17
  Z:\001VALP\Evidence & studies\SFRA\Sequential and exception
tests\ST FIRST DRAFT\RESPONSES
- Sequential Test v2.0 – comments received 30.08.17
  Z:\001VALP\Evidence & studies\SFRA\Sequential and exception
tests\ST VERSION 2

5. Outcomes from strategic working
What was the result of the strategic cooperation and how has this influenced
the plan (include specific references to relevant policies where possible)?
Include any issues that remain unresolved and how the authority plans to
manage these. Outline what the implications are of these unresolved matters

The SFRA and Water Cycle studies have been completed, tackling all
feedback received and in line with an agreed methodology. All queries on the
draft stages are considered responded to and addressed.

The **Sequential Test** has been completed and is considered to meet the NPPF and has been completed tackling two stages of comments, all queries have been addressed and responded to.

The **VALP sites and policies** (particularly I4) take account of the findings of the **SFRA** and **Sequential Test** work. The **VALP policy** (particularly I5) takes account of the **Water cycle studies** and site allocations include need to identify infrastructure capacity where relevant and Infrastructure Delivery Plan sets out infrastructure enhancements needed.

6. **Ongoing cooperation**

How will the strategic issues be managed on an ongoing basis? What are the mechanisms/structures being used to do this? How will this be monitored?

Regular (quarterly) meetings of the Buckinghamshire Flood Technical Management Meeting.

Ongoing engagement between AVDC and Bucks CC officers and members on the VALP

Informal officer-officer liaison in between meetings as required.

2.11 **Strategic Planning Issues Statement – Green Infrastructure and Biodiversity**

1. **Strategic Planning issue**

To ensure green infrastructure is planned strategically to meet connect existing networks and address areas of deficiency – including the centre of the district and also provision within Aylesbury Garden Town to offset recreational impacts on the Chilterns.

2. **Evidence base**

https://www.aylesburyvaledc.gov.uk/%E2%80%8Blandscape-evidence-and-open-spaces-reports

- Open Space, Sport and Recreation Needs - Main Report
  The report of assessment by specialist consultants Torkilsden Barclay identifies the open space, sports and recreation needs for Aylesbury Vale in the context of the housing growth identified in the Vale of Aylesbury Local Plan Draft Plan stage. This assessment is an update/revision of the 2012 assessment by the same consultants examining new information of provision in the Vale and national standards and policies relating to open space, sports and recreation. The report provides recommendations that will be considered in drafting the VALP Proposed Submission for summer 2017.

- Open Space, Sport and Recreation Needs - Addendum on RAF Halton
  This review explores the potential additional open space, sport and recreation provision as a result of the development needs identified in the proposed site allocation in VALP at RAF Halton. The typologies used are those set out in
the 2017 Assessment of Open Space, Sports and Recreation Needs for Aylesbury Vale report, and the standards applied are those identified within that report.

Biodiversity - the HELAA studies, in consultation with Buckinghamshire County Council has ensured (with use of biodiversity constraint layers) development avoids adverse impacts on the district biodiversity assets.

Biodiversity – the Habitats Regulations Assessment in consultation with Natural England has ensured the VALP growth will not have significant adverse impacts on Special Areas of Conservation, EU-designated biodiversity sites in the Chilterns and also Aston Rowant.

### 3. Strategic Partners

List of bodies engaged with (details of each, make up and constitution etc, to be listed in appendix 3)

None on the Torkilsden Barclay Open Space Sports and Recreation evidence – it is just internal consultees

But on wider strategic issues – we have engaged actively with the Bucks and Milton Keynes Natural Environment Partnership

Z:\001VALP\Duty To Co-operate\Other Public Bodies\Bucks and MK Natural Environment Partnership\Minutes Agendas\LNP Minutes of meetings

What is mentioned in VALP? – see para 11.5, 11.9 and policy I1 on the provision of the provision of new GI/retention of GI

### 4. Actions

How have you worked collaboratively with your partners?
What actions did you take to manage the strategic issue?
Was there any joint evidence developed e.g. SHMA? Who was involved? Include timescales for the evidence in an annex to demonstrate how and when key decisions were made (appendix 2).

Action : NEP meetings
Partners The NEP
Outcome: Alignment of GI strategy to be taken account of in VALP and a review of the Aylesbury Vale GI Strategy
Date : Various meetings of the partnership 2016, 2017

### 5. Outcomes from strategic working

What was the result of the strategic cooperation and how has this influenced the plan (include specific references to relevant policies where possible)? Include any issues that remain unresolved and how the authority plans to manage these. Outline what the implications are of these unresolved matters

para 11.5, 11.9 references to the NEP vision and principles document and policy I1 on the provision of the provision of new GI/retention of GI

### 6. Ongoing cooperation

Continued membership of the NEP, review of the AV Green Infrastructure strategy and Buckinghamshire GI Delivery Plan
### 2.12 Strategic Planning Issues Statement – Heritage and Historic Environment

<table>
<thead>
<tr>
<th><strong>1. Strategic Planning issue</strong></th>
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<tbody>
<tr>
<td>To ensure that the historic environment and heritage assets (both designated and undesignated) are given appropriate weight in the Local Plan.</td>
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<tr>
<th><strong>2. Evidence base</strong></th>
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<tbody>
<tr>
<td><strong>What is the evidence used to develop the LP’s strategic policies?</strong></td>
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<tr>
<td>Historic England Guidance to Local Authorities on Local Plans</td>
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<tr>
<td>Bucks and Milton Keynes Historic Landscape Characterisation, 2006</td>
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<tr>
<td>AVDC Conservation Area Management Plan and Conservation Areas Supplementary Planning Document</td>
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<td>Individual Conservation Area Character Appraisals</td>
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<td>Aylesbury Vale Historic Landscape Character Assessment</td>
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<tr>
<th><strong>3. Strategic Partners</strong></th>
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<tr>
<td>Natural England</td>
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<td>Waddesdon Estate</td>
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<th><strong>4. Actions</strong></th>
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<tr>
<td>Development of specific heritage / historic environment policies following on from the 2016 consultation on the draft Local Plan for the Aylesbury Vale District. The policies will help to guide planning applications concerning heritage assets in the Aylesbury Vale District and set out the Council’s approach to the historic environment.</td>
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Partners: Historic England

Outcome:
- The new policies were shared with Historic England in advance of finalising the proposed submission VALP, and Historic England submitted their comments on the policies.
- These comments were taken into account to produce a sound and robust policy approach to the historic environment which fully satisfies the government’s requirements as outlined in the NPPF.

Date: August 2016

Support AVDC in producing an adequate, up-to-date and relevant historic environment evidence base in order to demonstrate in the VALP how that historic evidence base has informed and influenced the VALP policies and site allocations.

Partners: Historic England/Waddesdon Manor Trust

Outcome:
Site Allocations Policies and Historic Assets Policy within the proposed submission VALP formulated using up to date relevant historic asset/record data/information including Waddesdon and Waddesdon Manor.

Date: August 2016/Summer 2016

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<th><strong>5. Outcomes from strategic working</strong></th>
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<tr>
<td>The cooperation of Historic England in developing the VALP policies for Heritage Assets has helped to strengthen the wording of this policy. It has been imperative for</td>
</tr>
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</table>
Historic England to provide advise and guidance in developing a policy which has a very broad scope from non-designated assets, archaeological remains, conservation area and listed buidings o scheduled monuments.

The strategic work undertaken with Historic England and Waddesdon Manor Trust has led to the development of the proposed VALP Historic Assets Policy as well as WAD006 Site Allocation for Waddesdon

6. Ongoing cooperation

AVDC expect to have full dialogue with both Historic England and Waddesdon Manor Trust as site allocations and other proposed development that will have an impact on the setting of historic assets come forward.

Any future amendments to Conservation Areas or Listed Building applications will continue to require further dialogue with our strategic partners to ensure the protection and careful management of historic assets and the characteristics of the environments they are in are upheld.

2.13 Strategic Planning Issues Statement – Gypsy, Traveller and Travelling Showpeople Accommodation

1. Strategic Planning issue

As set out in ‘Planning policy for travellers sites’ local planning authorities should assess the need for traveller sites, ensure that the need is met through collaborative working with other local planning authorities and ensure that plans include fair, realistic and inclusive policies.

2. Evidence base

**Bucks Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment 2017 update (February 2017)**

The primary objective of the Bucks Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment 2017 update (February 2017) was to provide a robust assessment of current and future need for Gypsy, Traveller and Travelling Showpeople accommodation in Aylesbury Vale, Chiltern, South Bucks and Wycombe districts in Buckinghamshire. As well as updating previous GTAAs, another key reason for completing the study was the publication of a revised version of Planning Policy for Traveller Sites (PPTS) in August 2015 which had significant implications for determining the need for traveller sites.


Opinion Research Services (ORS) were commissioned by the local authorities in Buckinghamshire in 2012 to undertake a Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment (GTANA). Since the original report was completed there have been a number of changes in circumstances in some of the local authorities, together with changes to policy and guidance. It was therefore felt necessary to update the original findings in light of these changes, and also to address changes to how evidence is being considered in light of planning decisions.
The study sought to provide an evidence base to enable the Buckinghamshire authorities to comply with their requirements towards Gypsies and Travellers and Travelling Showpeople under the Housing Act 2004, the National Planning Policy Framework 2012 and Planning Policy for Traveller Sites 2012. The main objective of this study is to provide the Councils with robust, defensible and up-to-date evidence about the accommodation needs of Gypsies and Travellers and Travelling Showpeople in Buckinghamshire during the period until 2023 in five year sections covering 2013-2018 and 2018-2023.

### 3. Strategic Partners

Partners directly involved in the production of the joint evidence base were:

- Chiltern District Council;
- South Bucks District Council; and
- Wycombe District Council.

Also consulted on the study before its finalisation were:

- Dacorum,
- Hillingdon,
- South Oxfordshire,
- Windsor and Maidenhead, and
- Three Rivers.

### 4. Actions

Collaborative working was undertaken through

- joint commissioning and financing of the studies by the four Bucks councils
- the establishment and operation of a specific joint officer working group to direct the undertaking of the studies
- approval of the studies through the Bucks Planning Policy Officers Group (BPPOG) and the Bucks Planning Group (BPG) involving senior councillors from the four councils.

The actions taken to manage the strategic principally involved

- securing a joint evidence base that met the requirements of Government planning policy and guidance on the topic of Gypsy and Traveller and Travelling Showpeople accommodation
consulting on the study with other councils prior to finalisation

consulting widely on the output of the study and potential policies and allocations in relation to the Issues and Options and Draft Plan stages.

As stated above joint evidence relating to Gypsy and Traveller and Travelling Showpeople was developed through collaborative working between the four Bucks councils with consultation of other adjacent councils and wider public consultation in association with VALP consultations.

The timescales for the preparation of the evidence were lengthy involving the initial study being commenced in 2012 and published in 2013. This was updated in 2014 with the study being updated again in 2017. The findings of the 2017 study were then accepted and agreed by the four Bucks district councils through the signing of a Memorandum of Understanding in July 2017.

5. Outcomes from strategic working

The result of the strategic cooperation between the Bucks district councils was the production of a joint evidence base which adhered to the latest Government planning policy and guidance. This has provided the evidence base to support the three local plans of the four collaborating authorities and allowed them to agree that there was no need to transfer unmet Gypsy and Traveller and Travelling Showpeople need between the councils as set out in the Memorandum of Understanding between the councils signed in July 2017.

Policy S6 Gypsy, Traveller and Travelling Showpeople in the submission Vale of Aylesbury Local Plan identifies the allocations to meet the need derived from the Bucks Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment 2017 update (February 2017).

6. Ongoing cooperation

The expectation is that each council will undertake monitoring of progress towards the targets derived from the Bucks Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment 2017 update (February 2017). The base information will be updated as part of the early review of VALP. Aylesbury Vale will seek cooperative arrangements with adjacent councils to address the issue when the new evidence is required.

2.14 Strategic Planning Issues Statement – Green Belt

1. Strategic Planning issue

As set out in paragraph 83 of the National Planning Policy Framework “Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in
exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.

2. Evidence base

- **Aylesbury Vale Green Belt Assessment Report Part 2**
  Report setting out the findings of an assessment of the Buckinghamshire Green Belt giving further consideration to parcels following the recommendations in Part 1. We are inviting comments on this document alongside the draft plan – follow this link to the online consultation form.

- **Buckinghamshire Draft Green Belt Assessment Methodology Part 2**
  Report setting out the draft methodology for an assessment of the Buckinghamshire Green Belt giving further consideration to parcels following the recommendations in Part 1

- **Buckinghamshire Green Belt Assessment Methodology Part 1**
  Report setting out the methodology for an assessment of the Buckinghamshire Green Belt to provide evidence of how different areas perform against the Green Belt purposes set out in national policy.

- **Buckinghamshire Green Belt Assessment Report Part 1**
  Report setting out the methodology and findings for an assessment of the Buckinghamshire Green Belt to provide evidence of how different areas perform against the Green Belt purposes set out in national policy

3. Strategic Partners

Partners directly involved in the production of the joint evidence base were:

- Chiltern District Council;
- South Bucks District Council;
- Wycombe District Council; and
- Buckinghamshire County Council (partly)

4. Actions

Collaborative working was undertaken through

- joint commissioning and financing of the Arup studies by the four Bucks councils and the County Council
- the establishment and operation of a specific joint officer working group to direct the undertaking of the studies
- approval of the studies through the Bucks Planning Policy Officers Group (BPPOG) and the Bucks Planning Group (BPG) involving senior councillors
from the five councils.

The actions taken to manage the strategic principally involved

  securing a joint evidence base that met the requirements of Government planning policy and guidance on the topic of Green Belt

  consulting widely on the output of the study and potential policies and allocations in relation to the Issues and Options and Draft Plan stages.

As stated above joint evidence relating to the Green Belt was developed through collaborative working between the four Bucks councils with consultation of other adjacent councils and wider public consultation in association with VALP consultations.

The timescales for the preparation of the evidence were lengthy involving the initial joint brief for consultants commencing in December 2014 with the study being commenced in March 2015 and the Methodology and Assessment of General Areas published in March 2016. This was followed by publication of the Draft Green Belt Assessment Part 2 Methodology July 2016 which was jointly prepared by Aylesbury Vale District Council, Chiltern District Council, South Bucks District Council and Wycombe District Council. The findings of the studies were then accepted and agreed by the four Bucks district councils through the signing of a Memorandum of Understanding in July 2017 as follows

1. The methodology and outcomes of the Green Belt Part 1 work are agreed.

2. That all the parcels/sub parcels of land recommended in the Part 1 assessment for further consideration be assessed in the Green Belt Part 2 assessments as well as other options that each council considers to be appropriate for their respective plan areas.

5. Outcomes from strategic working

The outcome of the joint working was to establish areas that could be removed from the Green Belt to potentially allow development on those areas. The study enabled Wycombe, Chiltern and South Bucks to indicate the areas that they would remove from the Green Belt and allocate for development. This in turn helped establish the level of unmet housing need that Aylesbury Vale was asked to accept. The resultant housing figures are reflected in the housing total contained in policy S2 ‘Spatial strategy for growth’ in the submission Vale of Aylesbury Local Plan.

Nevertheless unresolved matters remain between the county council and Chiltern and South Bucks councils in relation to the sites suggested for removal from the Green Belt.

The report has also allowed Aylesbury Vale District Council to alter the Green Belt boundary to add areas to the Green Belt on the boundary with Central Beds District Council which reflect the existing boundaries within the adjacent council’s area and meet the purposes of the Green Belt. This reflected in the Soulbury inset to the VALP Policies Map.

6. Ongoing cooperation
The expectation is that each council will undertake monitoring of progress towards delivering development on the sites identified for development as a result of the Green Belt Review. The need for further assessment of Green Belt boundaries will be assessed as part of the early review of VALP. Aylesbury Vale will seek cooperative arrangements with adjacent councils to address the issue when the VALP review is being undertaken.

2.15 Strategic Planning Issues – Other Authorities
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<thead>
<tr>
<th>Issue</th>
<th>Evidence Used</th>
<th>Strategic Partner</th>
<th>Comment/Necessary Outcomes</th>
<th>Outcome Actions/Unresolved Issues</th>
<th>Ongoing Cooperation</th>
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<tr>
<td>HMA/FEMA/unmet need</td>
<td>Joint Growth Options Study for the Luton HMA which considers and recommends suitable strategic options for meeting the needs of the HMA and Luton’s unmet housing needs.</td>
<td>Central Bedfordshire Council Luton Borough Council Aylesbury Vale District Council North Hertfordshire District Council</td>
<td>The purpose of the study is to identify potential sites and growth locations within the Luton Housing Market Area (the HMA) to meet housing needs as identified within the Luton and Central Bedfordshire SHMA. In the event that the HMA needs (for market and affordable housing) cannot be accommodated within the Luton HMA, a further stage may be required to consider and recommend suitable options for meeting the outstanding HMA shortfall within the areas of Central Bedfordshire, North Hertfordshire and Aylesbury Vale which lie outside the Luton HMA.</td>
<td>Officer Working Group - 25/02/2016 – joint commissioning agreement</td>
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<td>HMA/FEMA/Economic/Employment and Retail requirements</td>
<td>Berkshire Functional Economic Market Area Study and Economic Development Needs Assessment – Method Consultation</td>
<td>Thames Valley Berkshire LEP</td>
<td>The only comment we have to make as one of the Central Buckinghamshire Councils is that there may be differences in approach that needs investigating between what Nathaniel Lichfield are proposing in the Berkshire work and that which has been carried out</td>
<td>We will be interested to see where the Berkshire study defines the boundary of the FEMA. The view from the Central Bucks work was that South Buckinghamshire district had stronger</td>
<td>The methodology and draft final report of the Central Buckinghamshire Housing and Economic Development Needs Assessment</td>
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<td>HMA/FEMA</td>
<td>Aylesbury Vale Local Plan: Issues and Options Consultation December 2015</td>
<td>Bedford Borough Council</td>
<td>The consultation documents helpfully summarise the background studies which have been completed to date and demonstrate that the Central Bucks Housing functional links for economic development into the Thames Valley (particularly due to the proximity of Slough and the M4/A4 and Thames valley rail corridor) rather than with Wycombe, Chiltern and Aylesbury Vale districts. Therefore South Buckinghamshire are more likely to be part of a Berkshire FEMA. For completeness, the work completed in draft recently by ORS for the Central Buckinghamshire Councils also looked at a Housing Market Area the same boundary as the FEMA. Mon 26/10/2015, 13:44</td>
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<td>(HEDNA) including definition and assessment of FEMA can be viewed at: <a href="http://www.aylesburyvaledc.gov.uk/supporting-evidence">http://www.aylesburyvaledc.gov.uk/supporting-evidence</a></td>
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Market Area (HMA) and the related “best fit” area to be used as a basis for determining housing requirements has been arrived at through joint working with other local authorities including Bedford Borough Council. Bedford Borough Council supports this approach but notes that whilst the housing requirement for Aylesbury Vale is well evidenced there is still considerable uncertainty about the draft borough wide housing target figure. The draft target of 31,000 dwellings is welcomed as a starting point estimate which recognises the need for Aylesbury Vale to accommodate housing from other more constrained parts of the Central Bucks HMA.

03/12/17

new settlement study are known however, the housing target will need to be reappraised. In addition, information is not yet available from Milton Keynes or Central Bedfordshire Councils to confirm whether housing requirements for the Luton and Milton Keynes HMAs can be met in full within the borough boundaries of Milton Keynes, Luton and Central Bedfordshire or whether Aylesbury (as a location which lies partly within these HMAs) may be asked to meet some of these needs. Further consideration also needs to be given to the provision of employment land in the context of the existing employment land surplus. It is agreed that on the basis of the information currently should any of the forthcoming studies raise concerns about the capacity of Aylesbury Vale to accommodate the recalculated development requirement or its deliverability.
<table>
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<tr>
<th>HMA/FEMA /Economic /Employment and Retail requirements/Transport</th>
<th>Vale of Aylesbury Local Plan: Issues and Options Consultation December 2015</th>
<th>Bucks TVLEP</th>
<th>available options C, D and E are likely to be the preferred options but the deliverability of the options still requires further testing.</th>
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<td>As in our response to HEDNA, further evidence is required to determine the availability and deliverability of employment land across the Vale which takes into consideration market conditions and site conditions. We remain cautious as to whether employment land identified through the HELAA is deliverable or developable to the quantum of supply identified and/or whether it meet the needs of the commercial property market and growth sectors.</td>
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recommendations and joint working relationships of the local planning authorities in Buckinghamshire. Given the different time-frames to which the local plan processes are operating this has not been feasible to date, but we would like to see if this can be undertaken early in 2016. Overall we would wish to see the development of larger, well serviced business sites, located alongside strategic transport networks, this would need to be provided within a flexible framework to meet the emerging needs of business. This would include serviced office accommodation with a mixture of B1 office units for mixed and incubation uses, B2 Industrial Uses and to a lesser degree B8 warehousing. Many of the sites currently identified as either vacant or undeveloped are, in our opinion, being deliberately being withheld from market or being poorly promoted as
developers would like the sites to revert to residential use. In some circumstances BTVLEP would not resist such a change as long as there was the appropriate alternative provision of larger and strategically well-appointed sites offering flexible development and opportunities for high value research and development, attractive town centre employment opportunities. The inclusion of many of the sites, that are unlikely to come to market within a known time-frame, in our opinion, skews the assessment of the Employment Land Requirements figures included within section 9 of the HEDNA and would therefore recommend that an over-supply is provided to counter this issue. The site Reconnaissance exercise identified a number of greenfield sites that could be developed, but in a number of instances areas have not been brought to market. BTVLEP therefore feel therefore that the
significant over supply of Employment Land, which is most clearly seen in the Aylesbury Vale area (Fig 121) should be maintained and that this should not be used as an objection against new employment sites in locations within easy access of major strategic transport infrastructure. The HEDNA's conclusions on Employment Growth broadly reflect our expectations but there is no reference to Buckinghamshire Strategic Economic Plan or emerging Strategic Infrastructure Plan which will be an important feature going forward in securing investment and growth across Buckinghamshire and the Vale. BTVLEP is an identified body under the requirements for Duty to Co-operate therefore recommends that these documents should be referenced as part of the evidence base. We would like to see a more detailed assessment
be made of the employment land currently allocated within the HEDNA review area to show the status and likely delivery of previously approved employment land and in addition to existing employment sites. There seems to be an over reliance on site/premises supply which on the face of it falls outside mainstream commercial and property investment market. This seems to be a presumption of retaining commercial life expired sites and properties, which in turn deter commercial property market investment and depress values. It is important to recognise the commercial property market operates very differently from the local housing market. A full Employment Land Review is needed as critical evidence for the emerging VALP to provide a qualitative and detailed assessment of employment uses, this should include a full assessment of the commercial property market, key investment
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<td>Vale of Aylesbury Local Plan: Issues and Options Consultation December 2015</td>
<td>With regard to the OAN for Aylesbury Vale, we note that the Aylesbury Vale HEDNA (July 2015) identifies the requirement for 1,326 new homes per annum resulting in the provision of 26,520 new homes within the plan. 04/12/2015</td>
<td>04/12/2015</td>
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There is a presumption that smaller sites cannot meet affordable housing requirements and an assumption larger sites could make up the shortfall. Evidence is needed to support this statement. Placing a higher burden on larger developments may have a negative effect on overall viability and delivery. Nor may it be sustainable i.e. provision of affordable housing in locations where it is needed in smaller settlements/larger villages. This needs to be reflected in the Sustainability Assessment as a potential socio/economic impact.
period. However, the Issues and Options consultation document states that the OAN for Aylesbury Vale is 1,050 new homes per annum resulting in the provision of 21,300 new homes within the plan period which is derived from the draft Central Bucks HEDNA (Draft October 2015). The difference in the figures is attributed to the Central Bucks HEDNA taking into account ‘more recent advice and other factors such as unattributable population change’ but we are unclear as to what these are. Furthermore, as this is an issues and options consultation, it would seem more appropriate to include both sets of figures with explanations as to their origins, as part of the consultation itself. When considering the appropriate spatial strategy for AVDC in order to determine the broad locations for growth in the District and to meet the OAN, Cherwell District
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<th>HMA/FEMA /Economic/ Employment and Retail requirements</th>
<th>Vale of Aylesbury Local Plan: Issues and Options Consultation December 2015</th>
<th>Cherwell District</th>
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<td>Council as a neighbouring authority would support a local plan strategy which takes the following points into account. 04/12/17</td>
<td>As a neighbouring authority sharing a long border with Aylesbury Vale, Cherwell District Council supports collaborative and joint working with Aylesbury Vale under the Duty to Cooperate to ensure that strategic planning issues that cross the administrative boundaries of the two authorities are properly coordinated and taken account of in respective local plans. Cherwell District Council would welcome further formal engagement on how the options being considered in the Aylesbury Local Plan are being addressed as the next stages of the Plan are developed. Cherwell District Council adopted its local plan part 1 in July 2015. The local plan strategy aims to cater for the projected increase in population and households</td>
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in Cherwell up to 2031 by focussing housing development on the District's two main towns of Banbury and Bicester, plus the former RAF Upper Heyford site. This strategy was considered as being the most sustainable and was found to be entirely sound by the Inspector following the examination in public of the local plan. The proposed growth is based upon projections contained in the Strategic Housing Market Assessment (SHMA) for Oxfordshire as a whole (2014). Cherwell District Council has made sufficient housing and employment land provision to meet its own objectively assessed need. The Cherwell Local Plan identifies the key strategic housing sites that will need to be developed to meet housing needs in addition to those already approved. The Plan includes strategic sites of 100 or more dwellings. It does not specifically identify all sites for new housing for the
period up to 2031. Non-strategic sites will be identified through the Local Plan Part 2, through the preparation of Neighbourhood Plans and through the determination of applications for planning permission. The strategic sites include the extensive eco-town development, the re-development of defence land, the bringing forward of smaller and larger scale greenfield urban extensions and town centre regeneration proposals. Significant growth is planned at Bicester which is located close to the western boundary of Aylesbury Vale, where over the Local Plan period to 2031 around 10,129 homes are to be provided at Bicester. Any preferred strategy for AVDC including proposals for new settlements particularly in the west of AVDC should take into account the level of growth already planned for at Bicester in order to ensure that development is properly coordinated in a sustainable manner.
Development in the western part of AVDC should not have an adverse impact upon the vision for Bicester, which has government support as a ‘garden town’ (reconfirmed in the Spending Review published on 25th November 2015) catering for a nationally significant level of housing and economic growth. As it is not currently clear where the full quantum of growth in Aylesbury Vale will be allocated, under the Duty to Co-operate it is imperative that any proposal considered close to the town, within the broad locality that is of strategic interest, should complement the promotion of Bicester as a growth point through agreement and appropriate joint working with Cherwell and other stakeholders. Increasing employment land supply is an integral part of the vision for Bicester Garden Town and needs to address the wider region and the ‘knowledge economy spine’ from Science Vale through
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<tr>
<th>HMA/FEMA</th>
<th>Vale of Aylesbury Local Plan: Issues and Options Consultation December 2015</th>
<th>Dacorum Borough Council</th>
<th>Dacorum welcomes the approach that Aylesbury Vale is taking to the parallel consideration of housing and jobs need. This reflects the approach that Dacorum (and its neighbouring authorities in SW Herts) is taking through joint work on our SHMA and Economy Studies.</th>
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<tr>
<td>HMA/FEMA</td>
<td>Vale of Aylesbury Local Plan: Issues and Options Consultation December 2015</td>
<td>Luton Borough Council</td>
<td>In respect of the content and scope of the VALP, we considered that it is very important that the plan...</td>
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Employmen
t and Retail requirements
takes full account of Luton’s
unmet housing needs (12,000 dwellings at the
time, including affordable housing needs) and Luton’s
economic growth in the
preparation of AVDC’s Local Plan.

As a member of the
Steering Groups for the
Luton & Central
Bedfordshire Strategic
Housing Market
Assessment (SHMA) (2014
and 2015), AVDC is
familiar with the strategic
planning matters affecting
both Luton and the wider
Luton Housing Market Area.
The various iterations of
Luton and Central
Bedfordshire’s SHMAs
and AVDC’s SHMAs / HEDNA
conclude there are significant housing and
economic relationships
between our Councils with
part of Aylesbury Vale’s
administrative area falling
within the Luton Housing
Market Area. While it is
understood that AVDC
considers it has a ‘best-fit’
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<td>HMA/FEMA /OAN</td>
<td>Vale of Aylesbury Local Plan: Issues and Options Consultation December 2015</td>
<td>South Northamptonshire District Council</td>
<td>When considering the appropriate spatial strategy for AVDC in order to determine the broad locations for growth in the District and to meet the OAN, South Northamptonshire Council as a neighbouring authority would support a Local Plan strategy which takes the following points into account: 01/12/15</td>
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properly coordinated and taken account of in the respective Local Plans. SNC would welcome formal engagement on how the options being considered in the Aylesbury Vale Local Plan are being addressed as the next stages of the Plan are developed.

The following link summarises the responses received from other authorities during the VALP issues and options Consultation – October 2015. It also contains information about unmet need from the other authorities and how this has been identified:

https://www.aylesburyvaledc.gov.uk/sites/default/files/page_downloads/Summary%20of%20responses%20from%20neighbouring%20authorities.pdf
3.0 Ensuring the duty has been met with all identified bodies

The Strategic Issues Statements above identify the key partners involved in progressing those strategic issues. Other Duty to Cooperate bodies may have been involved in some of those strategic issues to a lesser extent and all have been consulted at the main consultation stages on the Plan where emerging evidence and proposals have been shared.

All duty-to-cooperate bodies who have less direct involvement in the above strategic planning issues it was considered necessary to contact these authorities/organisations to ensure that all possible strategic issues were identified and addressed. The approach to contacting these bodies is outlined below:

- For bodies who had previously responded to consultations – confirmation that the authority/organisation had no strategic issues which needed to be addressed in the preparation of the Vale of Aylesbury Vale Local Plan.
- For bodies who had not responded to any consultations since the launch of the WDLP – outlining the work which has been done so far, asking for any strategic issues which need to be raised, ensuring correct contact information is available.
- Bodies who were not involved or less directly involved in the outlined strategic issues but may have strategic interests in potential plan proposals – these authorities/organisations were written to outlining specific aspects of the plan that may be of interest. Once acknowledged, confirmation was sought whether the authority/organisation had any strategic issue which needed to be addressed.

4.0 Conclusions

The current position between DtC authorities and organisation and AVDC will contribute to evolve and be monitored. It is the intention of AVDC to update this DtC Statement of Compliance as and when meetings and agreements between AVDC and DtC bodies are undertaken. This will continue to evolve during the production of the VALP until submission for examination when existing issues are resolved through either the signing of a Memorandum of Understanding or a Statement Of Common Ground.

In time AVDC will issue a schedule of DtC bodies that no longer have a strategic issue with the VALP. This will include an updated position in relation to MoU and/or SOCG that have been signed during the production of VALP.

Appendices

Map of Functional Housing Market Area (HMA) and Map of Functional Economic Market Area (FEMA)

Map of AV in Duty to Cooperate – Administrative Areas
Maps of Functional Housing Market Area (HMA) and Map of Functional Economic Market Area (FEMA)
Figure 7: Extract from Buckinghamshire SHMA (2006)

Figure 2.2 Housing Market Areas of Buckinghamshire as defined in this SHMA

Map of AV in Duty to Cooperate – Administrative Areas
Map of Aylesbury Vale and its Duty to Cooperate - administrative boundaries