

Inspectors Question 56:

My Q38 sought the Council's observations on two representations relating to allocation D-AGT1 as did my Qs21 and 48. Please add to the representations to which I would like a response the following; representation 1103 from Mark Schull of Arrow Planning Ltd on behalf of CALA Groups Ltd and the William Hardy Charity Group, representation 1405 from Claudia Belardo and the representation from Christopher Roberts of Turley on behalf of Persimmon and CALA. (see also answers to Q57, 48, 38, 21)

Representation:

The representation has been summarised using the following bullet points:

- An increase to the allocation at AGT1 from 1,000 dwellings to a minimum of 1,500 dwellings
- The removal of the statement that development at AGT1 will be phased to come forward to the end of the Plan Period
- The removal of 5 gypsy and traveller pitches from AGT1 and their inclusion at AGT3
- The removal of the requirement for an SPD to be produced for AGT1
- The removal of a number of duplicated policy requirements.
- The proposed Aylesbury Transport Strategy and 4.17 interventions including the outer link roads have not been finalised and even confirmed as viable. Consequently, and by the Council's own admission that want to raise funds to build any new roads by building houses first which is, in itself, a self-defeating objective.
- Specifically thinking about Stoke Mandeville - the latest new road proposal for this village effectively moves the bulk of traffic from one road to another and with the increase in housing in the vicinity there has been nothing good in place to alleviate the current problem nor the exasperation which will inevitably occur as a result of yet more houses. This can currently be seen in the Berryfields and Buckingham Park estates.
- D1 – delivering Aylesbury Garden Town. This proposal is a direct contradiction of these terms. With this proposal, the Council is successfully stripping Aylesbury and any surrounding areas of green space and it is not being replaced. Engulfing surrounding villages and making Aylesbury into a City.
- Plans earlier this year specifically detailed that "The following settlements do not require any allocations in this plan as either their housing requirement has already been met, or due to their proximity to major development areas around Aylesbury, no allocations are required at Aston Clinton and Stoke Mandeville.
- I specifically refer to SM006, SM00, SM008 and SM010. This land floods. The nature of this land has not changed and the stream that is created from all the excess water that these fields harbour will currently run through the residents' back gardens along Dorchester Close due wet periods and already flood - and that is with no housing on this land. To give some indication as to the amount of water these fields hold. If they are no longer able to retain some of this water and it all spills into

these seasonal streams, then this will create a massive flooding problem which is why they are deemed unsuitable for development.

- The infrastructure cannot sustain any move to become a city, which in essence this latest proposal creates and I have grave concerns about the transparency of what AVDC is actually suggesting in this proposal since it is clearly not in any way an Aylesbury a 'Garden Town'.
- The site includes the remainder of land to the west of the railway line, but the wording of the Proposed Submission Local Plan (at paragraph 4.31) indicates that such land has not been formally promoted for development. This raises questions as to the availability and therefore deliverability of at least a section of the allocation. Further to this, it is evident that this allocation is comprised of a significant number of land interests, necessitating the creation of a Supplementary Planning Document (SPD) for the allocation.
- Whilst the production of an SPD is not an unreasonable approach (when seeking a coherent scheme across a large site), securing the support of a myriad of developers and landowners will invariably prove time-consuming
- The AGT1 allocation phased to the end of the plan period due to infrastructure but delivered by 2020, does not justify phasing;
- Does not appropriately plan for Gypsy and Traveller provision

Response:

The AGT1 1,000 unit figure has been based on a 35dph to account for a significant buffer between the strategic site allocation and Stoke Mandeville which reduces the developable site area.

AGT1 will be reliant on the delivery of infrastructure at an early stage in the plan period to ensure the development is mitigating its impacts at appropriate stages.

A key infrastructure requirement for AGT1 is the South East Link Road which has already received funding and a delivery mechanism is currently being worked up with site promoters and, The County Council and the Local Planning Authority. The Viability Study has accounted for the South East Link Road within its methodology and has scored positively in relation to viable policy compliance.

The G+T study and the relevant parts of the Housing Topic Paper show that there is a need for pitches to be provided in Aylesbury Vale. The extensive amount of housing development around Aylesbury provides the opportunity to meet some of this need in sustainable locations. The rationale behind not choosing AGT3 is because of the advanced stages of the planning application and the lack of opportunities to influence the application itself. AGT1 is however at a much earlier stage of development that allows such provisions to be included.

The removal of an SPD would have a negative impact on the delivery of AGT1 as it minimizes the impact piecemeal applications. Without an overarching guide to inform what the development should look like and what phased infrastructure it needs to deliver to mitigate its impacts and meet the requirements of the Garden Town location.

AVDC do not feel there are a number of policy requirement duplicated however, the last requirement could be removed as it could be perceived as being too generic.

Schemes within the ATS have been identified in the IDP and subsequently the viability evidence that supports the proposed submission VALP has tested several specific site allocations including the costs of the link roads. The council is also pursuing external funding to bring forward the infrastructure ahead of the development. Further, the viability of the council's overall approach is demonstrated by the developments which have already been permitted around Aylesbury that deliver elements of the ATS. The green space that is referred to is the farmland surrounding Aylesbury that on balance can be used to deliver sustainable development, as demonstrated by the Sustainability Appraisal, in a garden town format.

The Garden Town has commitments to relation as much character of existing villages and their relationship with each other and as part of the wider Aylesbury area as possible and will ensure buffers are delivered around adjacent villages and a minimum of 50% GI is delivered on individual strategic site allocations.

The statement is still correct and the proposed submission VALP does not allocate sites at either Aston Clinton or Stoke Mandeville due to high levels of existing commitments either within the settlements or site allocations nearby.

Areas within site allocations liable to flood will be included within the site allocation for green infrastructure/landscape buffer purposes and a design led approach incorporating these elements will be required. The implications of the proposed allocations for flood risk have been appropriately considered in the Strategic Flood Risk Assessment which accompanies VALP and individual applications will need to address flood risk in their detailed design.

The Aylesbury Transport Strategy has considered and accounted for all proposed/allocated growth in Aylesbury and tested this with infrastructure requirements to mitigate impacts. The modelling results illustrate that the level of development growth allocated is deliverable. The IDP has identified the required physical infrastructure to support the Garden Town and this work will be further detailed in subsequent Supplementary Planning Documents.

Delivering the site through an SPD can ensure that questions from individual land owners on infrastructure cost and provision and delivery rates are agreed prior to the possibility of lengthy and costly debate at application stages.

The rationale behind the phasing was due to the complexity of the site and ownership as referred to in the representations. There is also a range of committed sites around Aylesbury that will deliver housing in the earlier years of the plan period. This is further justification for this site to be phased later in the plan period. As stated above certain elements of infrastructure need to be delivered in advance of this.

Evidence collated for the site shows there is a demonstrable need in the south of Aylesbury Vale for G&T accommodation and a greater opportunity to deliver on this site than others.

- General Historic England points have been addressed in Q21
- General Water Utility points have been addressed in Q48