

## VALE OF AYLESBURY LOCAL PLAN EXAMINATION

**Inspector: Paul Clark BA MA MRTPI**

**Inspector's Questions to the Council:**

**Q43-53**

Q43 Would the Council please confirm whether any of the alleged errors reported by Mr David Vowles in his representation 1684 require either a minor change to the plan or a Modification?

Q44 I am somewhat concerned by the following passage in the paragraph 14 of the representation made by John Disley on behalf of Oxfordshire County Council (I have added underlining);

"In our response to consultation at the VALP Preferred Options stage, OCC requested that it be invited to work with AVDC and Buckinghamshire Councils under the duty to cooperate as the Local Plan evidence base is developed, to ensure that transport work takes account of significant growth proposals within Oxfordshire and the strategic infrastructure schemes identified or being explored to support it, particularly growth at Bicester and Thame. However, we have not been involved in modelling and related transport discussions and are concerned that insufficient attention has been paid to our comments submitted in response to consultation on the Aylesbury and Buckingham Transport Strategies."

Although this is somewhat contradicted by the passage in paragraph 28 of the same representation which refers to a cross-boundary transport impacts meeting on 04/12/17 and the statement in paragraph 30 "that following the cross-border transport impacts meeting, a programme of additional work has been agreed in principle and will be progressed alongside a Memorandum of Understanding between Aylesbury Vale, Cherwell, Buckinghamshire CC, and OCC", the statement reflects similar concerns expressed in the representation by Lewis Claridge on behalf of Hertfordshire County Council which comments that "the location of Aylesbury close to the boundaries of Hertfordshire, the direct road links, and the close cross-boundary connections and commuter flows between Aylesbury, south west Hertfordshire and Luton / Dunstable for instance, means that there needs to be an understanding of the likely cross boundary, cumulative impacts on the highway and transport networks of planned growth in all of these areas. Joint working with neighbouring LPAs and LHAs to understand and address these challenges may be needed in some areas in particular". It goes on to remark "We note the Cumulative Impact Assessment that has been undertaken and considers all of the development sites around Aylesbury.

However, we are concerned that it does not appear to consider impacts that may result outside of the border of the Vale of Aylesbury Local Plan. We also note the Aylesbury Transport Strategy commissioned by Bucks County Council and that transport modelling work has been undertaken – again, we have some concerns about how cross boundary impacts and cumulative growth is factored in.” It concludes by saying “HCC would welcome closer engagement with AVDC / BCC to better understand transport and highway implications of growth and planned development, infrastructure needs and transport proposals in our respective authority areas.”

In addition to these two comments from neighbouring highway authorities throwing doubt on AVDC’s discharge of its Duty to Cooperate a number of public representations comment on AVDC’s alleged lack of consideration of the effects on its plan on transport implications in Milton Keynes (examples include the representations from Jane Gardner of Marrons Planning and from Heather Pugh of David Lock Associates on behalf of O&H Properties referring to the Bletchley Southern Bypass).

A common theme to these representations is that they all concern the transport implications of the VALP, though there is also the relatively gentle comment contained in the representation from Hunt Ryan on behalf of South Oxfordshire concerning the impact on that authority’s playing pitch provision arising from development proposals within VALP and stating that “We would welcome dialogue with AV on the implications of this and the potential for sharing developer contributions to address the impacts of increased demand for these pitches and their associated facilities as a result of significant growth in Aylesbury Vale.” A similar comment in respect of Thame is made by Mr Graeme Markland in his representation on behalf of Thame Town Council; proposals in VALP “means that 1,205 dwellings identified within the Proposed Submission Plan will rely on Thame for their services. Yet there has been no conversation sought by the Vale Council with the Town Council, who, with its neighbourhood plan remit, have the greater local responsibility in providing infrastructure and supporting service facilities. This includes new GP/Health Hub facilities, a community centre, the movement of a primary school and the provision of further secondary school facilities; new sports facilities, parking, employment and public transport infrastructure. No evidence exists either that AVDC have been in conversation with South Oxfordshire District Council regarding cross-border impact on Thame, or its services and facilities.”

I would welcome the Council’s response to these observations on the discharge of its Duty to Cooperate, particularly in respect of the transport matters raised.

Q45 I would welcome the Council’s response to the representation (1823) by Mark Longworth of DPD Architects to the effect that the place of Weston Turville in the settlement hierarchy is unjustified and incorrect.

Q46 I would welcome the Council's observations on the representation (1081) from Ashley Maltman of West Waddy ADP on behalf of Pye Homes to the effect that site allocation QUA 014 cannot be delivered because of the HS2 proposal.

Q47 I would welcome the Council's observations on the representation (1730) from Mr Christopher Roberts of Turley Associates on behalf of Persimmon Homes Ltd and CALA homes ltd to the effect that 315 units are undeliverable on allocation DHAD 007.

Q48 In the light of the representation (455) from Savills Reading on behalf of Thames Water Utilities and from Anglian Water services Ltd (1046) , I would welcome the Council's comments on the deliverability of the site allocations AGT -1, 2, 3 and 4, AYL 032, 052, 059, 063 and 115, BUC 043, 046 and 051, SCD 0003 and 8 and MMO 006.

Q49 I would welcome the Council's observations on representations 350 and 733 from Mr Lawrence Odell personally and on behalf Boarstall Parish, 358 from Janet Marie MacTavish, 359 from Mr Pierse Odell, 457 and 458 from Mr James D Stallard of Leafgrove Ltd, 563 from Mrs Kelly Stallard, 829 from Sue Rudman, 986 from Anne Davies on behalf of Arncott Parish Council and 2390 from Michelle Kidd on behalf of the Environment Agency arguing that allocation of a Gypsy and Traveller site at Oaksvie Park Boarstall is not justified.

Q50 I would welcome the Council's observations on representation 2643 from Mr Steven Doel of Nexus planning Ltd on behalf of Gleeson Strategic Land arguing that policy S6 is unjustified.

Q51 In my Question 29, I asked for the Council's response to eight issues (concerning Housing Market Area, unmet needs, demographic base, market uplift, delivery rates, settlement capacity, affordable housing and special needs housing) derived from 19 representations, remarking that six were particularly strongly argued.

To the nineteen representations giving rise to those eight issues on which I seek the Council's response, I now add the following representations making some or all of the same points: (1119) Reece Lemon of Savills Oxford and Michael Wood of Indigo Planning, both on behalf of Land Improvement Holdings, (251) N Freer of David Lock Associates on behalf of Hallam Land Management, (1031) Tim Northey of Rectory Homes, (1013) Nicole Penfold for Gladman Developments, (1091) Robert Love of Bidwells on behalf of Persimmon Homes Midlands, Camilla Fisher of RPS on behalf of Halsbury Homes Ltd, Steve Browne of Persimmon, (468) Geoff Gardner of Gardner Planning Ltd on behalf of Arnold White Estates, Cameron Austin-Fell of RPS planning on behalf of Richborough Estates, D Veasey of Nexus Planning on behalf of Inland Homes and Western Mead Farms, Stephen Doel of Nexus

Planning on behalf of Gleeson Strategic Land, Mike Taylor of Chilmark Consulting Ltd on behalf of Barwood Land and Estates, David Vowles .

To the six particularly strongly argued papers I add; the paper by Roland Bolton of the Strategic Planning Research Unit submitted by N Freer of David Lock Associates and the work by Regeneris Consulting commissioned by Gladman Developments.

Amongst the eight issues identified was (iii) which included points made concerning migration rates and UPC rates. I note that in paragraph 35 of his report of January 2014, Inspector Kevin Ward found that whilst an over-estimation of migration may play a significant part in the unattributable component of change in the mid-year estimates, there is insufficient basis to conclude that it accounts for 100% of this figure. He found that whilst the Council has concerns as to the assumptions which underpin the projections, there was insufficient evidence to conclude that they are inaccurate to the extent suggested. My understanding is that the Council has made the same kind of adjustment to the (now different) population projections underpinning the presently submitted plan's housing requirements. I need to understand what has changed since 2014 which would lead me to come to a different conclusion to that of Kevin Ward on the soundness of this adjustment to the demographic base for the housing figures.

To the eight issues identified I add; (ix) Whether, upon adoption, the allocations identified in the plan would be capable of supplying sufficient specific deliverable sites to provide five years' worth of housing against the housing requirements of the plan, (x) whether it is justified to pray in aid the potential effects of the Oxford-Cambridge expressway for retaining a greater quantity of employment land than economic forecasts suggest is necessary, whilst not identifying a greater quantity of housing allocations to meet the housing demand expected to result from the Oxford-Cambridge expressway.

Q52 I would welcome the Council's observations on the representations by (422) Dr Glynn White of the Hampden Fields Action Group, (1154) by N Freer of David Lock Associates on behalf of Hallam Land Management attaching a Review of the Transport Evidence Base by Markides Associates and (347) by Phil Yerby attaching reports by the Transport Planning Practice on the operation of the Walton Street gyratory and on the Draft Aylesbury Transport Strategy and on the County Council's Transport Modelling and Assessment which suggest that the transport strategy and proposals of the plan may not be soundly justified, with particular reference to the representations made (i) on the capability of key elements of the network, such as the Walton Street gyratory, to handle the traffic resulting from the chosen development strategy (ii) on the poor validation score of the county's model and (iii) on the identification and quantification of effects which the road proposals are intended to deal with.

Q53 I would welcome the Council's observations on the representations by Tim Burden of Turley on behalf of SEGRO PLC and Matthew Dauber of Savills on behalf of the Berryfields Consortium on employment land provision.

10.4.18