

Inspector P. Clark
Planning Inspectorate
Temple Quay House
2 The Square,
Avon
Bristol BS1 6PN

Wednesday, 11 July 2018

Dear Mr Clark,

**Re: Vale of Aylesbury Examination in Public
Session 11: Matter 1 Development Strategy (Spatial Distribution Strategy)**

1.0 Introduction

1.1 This Statement responds to the Inspector's main issues on Matter 1: Development Strategy (Spatial Distribution Strategy) and is in relation to the Examination of the Vale of Aylesbury Local Plan.

1.2 This Statement has been prepared by Ingleton Wood LLP (IW) on behalf of High Barrow Holdings (HBH). HBH have land interests at Calvert Green (ref: CAL002 of the Housing & Economic Land Availability Assessment (May 2016) (HELAA).

2.0 Matters for discussion 1. *Have I [inspector] correctly understood the thrust of the representations?*

2.1 We appreciate that you were satisfied with the answer given by Aylesbury Vale District Council (AVDC) in relation to your **Q1** however we would like you to consider the likely socio-economic impacts likely to result if the sustainability and viability of 'smaller villages' solely relies upon "wealthy incomers" (the phrase used by AVDC in **Q1**). Whilst it is agreed that local shops and pubs (as defined as essential facilities in the wording of **Policy D6**) are facilities used across the socio-economic spectrum, it should also be recognised that the affordability of existing essential services is likely to change as waves of wealthier residents supplant existing residents who typically demand higher quality goods and services which are more expensive.

2.2 Such an event will be at odds with AVDC's overarching 'Spatial Vision' (Paragraph 2.4, Page 24 of the proposed Local Plan) which seeks to create "...*thriving, diverse,*

safe, vibrant place to live, work and visit where **all residents** enjoy a high quality of life”.

- 2.3** A dispersed distribution of growth to smaller settlements would assist in supporting a critical mass for a range of essential facilities aimed at providing for a range of incomes during the plan period. We feel that consideration for the social role that sustainable development must play is absent from AVDC’s spatial strategy and is therefore not consistent with the NPPF’s 12th core planning principle.

*“[Planning should]...take account of and support local strategies to improve health, social and cultural **wellbeing for all**, and deliver **sufficient community and cultural facilities and services to meet local needs**”.* (Page 3)

- 3.0 Matters for discussion 2** *Should the relationship with MK be better recognised?*

3.1 No observation/comment

- 4.0 Matters for discussion 3** *Do the allocations for Buckingham, Winslow and Newton Longville adequately acknowledge the relationship with the MK HMA? (27869) Crest Strategic Projects points out that 24% of allocations are in the north of the district. MK HMA represents 16% of existing population of AVDC)?*

4.1 No observation/comment

- 5.0 Matters for discussion 4** *Was a dispersed settlement strategy given adequate consideration as an alternative?*

5.1 We refer to the Inspector’s **Q86** which asked AVDC to respond to representation reference 1342 (Ingleton Wood). The reference stated that the proposed Local Plan did not consider alternative growth strategies namely those that would support development in smaller settlements and strategies that would meet the future demand for growth in the Oxbridge Corridor.

5.2 In response to **Q86** (uploaded 19/06/2018) AVDC acknowledged that allocated housing sites in the Local Plan were generally concentrated at existing settlements. AVDC thereafter provided a response to which we have provided our comments as follows:

5.3.0 AVDC response to rep: *“Many of the villages have housing allocation in their respective Neighbourhood Plans. These allocations have been tested against the basis conditions, meaning that they have been found to be sustainable through an examination. It also ignores the considerable number of dwellings permitted through planning permissions and the clustering of available sites around strategic settlements in the Housing and Economic Land Availability Assessment (HELAA). The settlement hierarchy also sets out the relative suitability of rural settlements to accommodate development in accordance with Paragraphs 55 of the NPPF. As*

such, it is deemed that the view of the representation is looking at the VALP allocations in isolation and is therefore lacking necessary nuance”.

5.3.1 Ingleton Wood/High Barrow Holdings response to AVDC: The table below shows ‘smaller villages’ where an application has been made to designate a Neighbourhood Area.

Figure 1: ‘Smaller Villages’ with proposed Neighbourhood Area designations

https://www.aylesburyvaledc.gov.uk/neighbourhood-planning-summary-and-live-consultations accessed: 10/07/2018						
Designated Small Village	Neighbourhood Area Application	Pre submission consultation (Reg 14)	Public Consultation (Reg 16)	Examiners Report	Referendum held	Made
Adstock	None					
Akeley	None					
Ashendon	None					
Aston Abbotts	Approved on 08/07/15					
Beachampton	None					
Bishopstone	None					
Buckland	Approved on 30/01/2014	COMPLETE 26/06/15	COMPLETE 26/10/15	Yes	Yes	04/03/16
Calvert Green	None					
Chackmore	None					
Chardon	None					
Chearsley	None					
Chilton	Approved on 24/02/2014					
Cublington	None					
Dinton with Ford and Upton *	Approved on 04/02/2013					
Dagnall	None					
Drayton Parslow	Approved on 18/07/2016					
East Claydon	None					
Granborough	None					
Greatbrick Hill	None					
Halton	Approved on 04/10/2016					
Hardwick	None					
Ivinghoe Aston	Approved on 06/01/2015	COMPLETE				
Little Horwood	None					
<i>* Ford and Dinton designated as separate ‘smaller villages’ i.e. they count for two villages.</i>						
Designated Small Village	Neighbourhood Area Application	Pre submission consultation (Reg 14)	Public Consultation (Reg 16)	Examiners Report	Referendum held	Made

Ludgershall	None					
Mentmore and Ledburn	None					
Mursley	Approved on 12/07/2017					
Nash	Approved on 06/06/2016					
Northall	None					
Oakley	None					
Oving (including Pitchcott)	None					
Preston Bissett	None					
Shabbington	None					
Slapton	Approved on 06/01/2015	COMPLETE 13/03/17	COMPLETE 09/02/18	Yes		
Soulbury	None					
Stowe and Dadford	None					
Swanbourne	None					
Thornborough	None					
Turweston	None					
Twyford	None					
Westcott	None					
Weedon	None					
Westbury	None					
Whaddon	None					
Worminghall	Approved on 19/09/2016	COMPLETE 17/11/17	COMPLETE 28/02/18	Yes		

5.3.2 Table 2 of the proposed settlement hierarchy on page 38 of the Local Plan states that in the smaller villages the amount of housing development will....

“....come forward through neighbourhood plans or through the development management process considered against relevant policies in the Plan”

5.3.3 Of the 45 total ‘smaller villages’ only 10 have made applications to designate Neighbourhood Areas (22%). It is our view that relying on Neighbourhood Plans to deliver growth in smaller settlements poses a risk particularly where at present there does not appear to be an appetite to designate Neighbourhood Areas within ‘Smaller Villages’ and therefore no way to positively plan for local development. In the absence of an NP or a more dispersed strategy, proposals for development needed to meet demand will be constrained by proposed **Policy D3** ‘Housing development at ‘smaller villages’. We reiterate that **Policy D3** and AVDC’s proposed spatial strategy will not meet the demand for the development needed to deliver the objectives of the Oxford-Cambridge Corridor nor the proposed Government’s indicative assessment of housing need (2016 to 2026) which states that 1,499 dwellings per annum (DPA) will be required in the district (up from AVDC’s Objectively Assessed Need of 965 dpa).

5.4.0 AVDC response to rep: *“The Sustainability Appraisal of the Vale of Aylesbury Local Plan (September 2017) does not contain a paragraph 3.3.7. It is assumed that the representor meant to refer to paragraph 6.3.7. This states **“The consultation document concluded that: “It is unknown whether a dispersed option (Options F to I) could deliver the housing requirement. Assessing these would require further detailed work to identify land with potential in smaller villages and other locations currently considered unsuitable, and consider sustainability aspects, such as transport, access to services and jobs, provision of infrastructure – key considerations which inform where new development should take place.”** The report essentially presented Options A to E as the ‘reasonable’ alternatives (the decision as to which alternatives are “reasonable” being one for AVDC to make), albeit Options F to I were not ruled out entirely, pending further work.”* It is clear from reading the paragraph in its entirety that it is not the case that the more dispersed approach was not considered a reasonable alternative due to it requiring further detailed work”.

5.4.1 Ingleton Wood/High Barrow Holdings response to AVDC: We confirm that the representation refers to paragraph 6.3.7 of the ‘Sustainability Appraisal (SA) of the Vale of Aylesbury Local Plan’ (2017) (page 18). Further work to support or discount a dispersed option (Option F) should be carried out in light of the expected completion of major infrastructure projects namely East West Rail, HS2 and Oxford-Cambridge Expressway all within the plan period (2023, 2026, and 2030 respectively).

5.5.0 AVDC response to rep: *“Further, the HELAA found that there are not enough dispersed sustainable sites that can deliver the housing needs of the district. In addition, it would be inappropriate to have dispersed distribution as it would require dispersed infrastructure provision which would not be an effective or sustainable*

approach. Rather, the approach of concentrating growth would mean that infrastructure could be more concentrated which ensures deliverability and effectiveness. Dispersal of growth would also mean dispersal of and increase in travel movements to access essential services. It is against this background that the Council chose to go for the capacity-led approach which is in line with that set out in settlement hierarchy.

The impact of the Oxford Cambridge Expressway cannot be determined at present so it is not possible to plan for its impacts. The early review of the local plan that is committed to by the council will address the impact of such matters when they are more clearly defined”.

5.5.1 Ingleton Wood/High Barrow Holdings response to AVDC: We refer you to 5.5.0 in regards to planned major infrastructure located outside of the main settlements.

6.0 Matters for discussion 5 *Is the distinction between larger and medium villages justified?*

6.1 No observation/comment

7.0 Matters for discussion 6 *The correct identification of settlements within the hierarchy; based on actuality and on potential?*

7.1 Settlements must not only provide for housing, work and facilities for existing residents but must also be recognised for their potential to provide for new homes and economic development across the Oxford-Milton Keynes-Cambridge corridor. Allocations for employment and homes should be based on the settlement’s proximity to planned infrastructure, namely the East West Rail, Oxford Cambridge Expressway and HS2.

8.0 Matters for discussion 7 *The correct identification of settlements’ capacity; minimum or cap?*

8.1 In view of the planned infrastructure mentioned in 7.1 the proposed Local Plan has not considered future demand for housing and employment land and therefore development at settlements should not be capped.

9.0 Matters for discussion 8 *Should there be reserve sites?*

9.1 There should be reserved sites to meet the demand for economic development and housing. The allocation of reserved sites should be based on proximity to planned infrastructure, namely the East West Rail, Oxford Cambridge Expressway and HS2.

10.0 Matters for discussion 9 *Would there be coalescence and does it matter?*

10.1 Given the Local Plan seeks to concentrate the majority of development within existing settlements, those located near Aylesbury are likely to coalesce. Whether or

not coalescence is or is not desirable needs to be made on a case by case assessment.

11.0 Matters for discussion 10 The Core Strategy Inspector's 2010 concerns about growth around Aylesbury?

11.1 No observation/comment

12.0 Matters for discussion 11 *The protection of the countryside?*

12.1 Considerations as to whether the countryside (or part of the countryside) should be protected must be made on the merits of an application/site allocation coming forward. Opportunities to plan for economic development should be taken particularly in locations in proximity to planned future infrastructure.

Yours sincerely



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