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Mr P W Clark
Planning Inspector - Vale of Aylesbury Local Plan
c/o Louise St John Howe
Programme Officer - by email: louise@poservices.co.uk

22 July 2019

Dear Mr Clark,

Maids Moreton Site MMO006 in VALP

I am writing in my personal capacity as a resident of Maids Moreton as well as being a Regulation 19 Objector and the Maids Moreton Parish Councillor leading on planning matters. I do not envy you in your task of having to review such a huge volume of documentation and I do appreciate that this issue, while vitally important for this community, is still a relatively minor part of the overall VALP. Nevertheless, I believe that there are very serious issues of practice surrounding the way in which the site was adjudged suitable and in the subsequent decision making culminating in its approval by SDMC on 20 February 2019.

You already have a number of documents from residents and a very detailed one from the Maids Moreton and Foscoate Action Group. Below I set out a simple summary of the critical parts of the plot in this Tragedy of Errors, which I trust will be of assistance to you.

- The 2017 Settlement Hierarchy Assessment Report (SHAR) defined Maids Moreton as medium village. However, a medium village is supposed to meet 6 to 7 Key Criteria; Maids Moreton does not do so. It was erroneously stated to have an hourly bus service, which it did not. It also only has an infant school, not a full primary. SHAR seems to have been viewed by AVDC as an informal guide and not an objective decision aid. MM is described as “well connected” to Buckingham, which is untrue, especially without an adequate bus service as the distance, and quite steep climb, would be too much for the elderly or those with young children. Public documents with decision guides are by their nature meant to be objective, not malleable, as this is the mechanism used to ensure consistent application.
- One should expect a reasonable proportionality in housing developments across villages; obviously these cannot be a consistent fraction but one might expect limited variation. HELAA 4 allocations for all medium villages would result in an average quota of new housing of 4.6 dwellings per 100 current residents. For MM, the figure is over 20 dwellings, which would increase the current population by 50%. This appears to be excessive.
- Site MMO006 was consistently classified as unsuitable for development through HELAA iterations to HELAA 3 and in the 2016 draft VALP. HELAA 4 reversed this classification and declared the site suitable for 170 houses, which led to its inclusion in the 2017 VALP.

- HELAA 4 was not subjected to any consultation. AVDC have argued that the changes were technical and consultation was not required. Common sense would suggest that a change that increases a community's population by 50% is rather more than technical. Furthermore, the lack of consultation clearly breaches the VALP submission statement on consultation, which requires specific consultation with Parish Councils (there was none) and with individuals. MMPC and individuals only became aware of the change when the revised VALP was presented in 2017.
- In the 2016 draft VALP, MM was allocated 69 new houses. As the then current HELAA 3 included 21 on possible sites and there were 2 completions or commitments, this left 46 to be allocated. This number could have been reasonably easily accommodated and would have resulted in 8 new dwellings per 100 current residents. This is above the average but potentially manageable and acceptable.
- Site MMO006 was withdrawn prior to the local plan hearing in August 2018 but then re-inserted at the last minute; there was no external consultation on these changes. It is not clear why there was this apparent indecision but Freedom of Information requests clearly show that there was correspondence between the developer and the AVDC planning section albeit not directly with those charged specifically with working on the application from the developer.
- Part of the rationale for agreeing that the development of 170 houses on site MMO006 was that the village lacked recreational facilities and the development would assist in remedying this. This is untrue and it is clear from the SHAR that AVDC is aware that MM has recreation facilities/playing fields as this is scored as one of the key services leading to its mis-classification as a medium village.
- The developer for this site held a public meeting in November 2015 at which they presented their proposals to the community. They analysed the responses to the questionnaire handed out. In response to the first question as to whether people considered the site suitable for housing development, 3 out of 42 responses (7%) said yes. From November 2015 to February 2019, the developer had no consultation with either MMPC or the wider public; this would appear to be in clear breach of the Gunning Principles.
- The application was considered at AVDC SDMC on 20 February 2019. The Committee approved it by a vote of 6 to 3. However, there are some very serious issues surrounding this decision. The Planning Officer's brief dated 11 February and the updating corrigendum dated 19 February stated that AVDC had 11.7 years of housing land supply. At the hearing, the AVDC Corporate Planner intervened to advise the Committee that they had had to recalculate this figure using a revised approach and it was now estimated at 5.4 years. This obviously influenced the decision. As the new figure was known to AVDC on 20 January 2019, from an Inspector's hearing on another application, it is unclear why the figure of 11.7 years was not changed earlier. This was certainly not helpful to those who opposed the application.
- After the chairman closed SDMC meeting, which was recorded on a Webcast, he turned to his vice-chair and said, "I thought that we were in danger of having that one unceremoniously thrown out." This does not inspire confidence that the Committee took an open view of the application; it suggests strongly that the decision was pre-determined.
- The issue of increased traffic along Main St, which has 12 Grade 2 listed buildings along its 400 metres, is of great concern. The SDMC corrigendum brief notes that Transport for Buckinghamshire opine that "the impact of the development traffic along the full length of Main Street will be minimal." This directly contradicts the statement from the Planning Officer in the next paragraph that "it is acknowledged that additional traffic would be created and that this would be substantial."

- Increased traffic on Main St, which for much of its length has only one and sometimes no pavement, is a major safety concern. Furthermore, the impact on listed buildings, which lack foundations, appears to have been ignored. The AVDC Heritage and Conservation Officer looked only at the proposed mini-roundabout at the Walnut Dr /Main St junction while ignoring completely the Grade 2 listed building further down Main St as well as the Grade 1 listed church, where proposed widening of Mill Lane from 2.3 to 2.5 m would potentially lead to serious damage. No vibration studies have ever been made despite the clear vulnerability of the historic buildings in MM.
- Transport for Buckinghamshire in their consideration of traffic impacts propose to monitor traffic flows after development to determine whether there are severe impacts that will need remedy. This would appear to rather undermine the primary purpose of planning, which is to identify and remedy potential issues before making changes. It also suggests indecent haste in the decision making process.
- VALP is supposed to be predicated on Sustainable Development. The officer's brief to SDMC included discussion of whether or not the proposal met the criteria for sustainable development in its section 10 b. Several sub-sections of the information presented therein appear to be based on a misunderstanding of what constitutes sustainable development. For example, that on Building a Competitive Economy states that construction would be a major benefit. This is fallacious since it is not site specific. The analysis should be comparative with other sites and consider marginal, not absolute values. This is fundamental to any economic analysis.
- No mention is made in either the officer's brief to SDMC or, indeed, in the 2017 VALP of the very comprehensive Sustainability Assessment commissioned by AVDC and reported in July 2016. This rated site MMO006 as the least sustainable of the options considered. It seems odd that such an expensive commission was not considered worthy of mention and it seems to have been completely ignored.

I appreciate fully that AVDC is under great pressure from Central Government to build houses. However, that alone is not a mandate to ride roughshod over the views and interests of current residents nor, indeed, of good practice guidelines and professional standards, including those defined by AVDC itself. I expect professional personnel in AVDC and BCC to operate to professional standards equivalent to those to which I operate within my own professional field and to which I am required to comply by virtue of my being a fellow of my professional institute. It concerns me greatly that there appear to be too many instances where expected professional standards have been side-lined in the interests of expediency.

Yours sincerely,