

### **Inspectors Question 30**

My earlier Q6 raised the question of the soundness of delegating substantial provisions of the plan to Supplementary Planning Documents. In addition to the examples listed in that question, representations made have brought me to the realisation that policies T1 and T3 may effectively delegate the formulation of transport policies and proposals to the Buckinghamshire Local Transport Plan and impose a planning requirement for development proposals to comply with that plan and so, in effect by-pass the statutory requirements for affording the opportunity to make representations on the policies and proposals concerned. I would therefore appreciate receiving the Council's observations on the soundness of this approach.

#### **AVDC Response:**

For the purposes of consistency the Buckinghamshire Local Transport Plan or LTP will be referred to as the LTP4 for the purposes of this response and in the VALP.

The Buckinghamshire Local Transport Plan 4 (LTP4) contains policies for specific issues concerning maximizing the usage of public transport, car sharing, cycling, walking and ensuring the reliability and safety of the counties' roads. The LTP4 does not impose any specific planning requirements or restrictions on development. Rather, it identifies general objectives that are designed to encourage better and more sustainable use of transport through working with partners such as AVDC. LTP4 is not currently part of the development plan and it is not suggested that this should change. Likewise, LTP4 is not a supplementary planning document designed to flesh out the development plan. Instead, it is a material consideration to be taken into account as part of the normal planning decision-making process.

The intention of VALP policies T1 and T3 is simply to ensure that development proposals consider the transport objectives in LTP4 agreed between Buckinghamshire County Council and AVDC (as is standard practice in a 2 tier authority).

However, it is accepted that policies T1 and T3 could be better worded to achieve this aim and avoid any confusion in respect of the status of LTP4.

It is therefore proposed that the first sentence of the first paragraph of T1 is amended so that it provides: "Development proposals must have regard to the transport policies and objectives set out in the Buckinghamshire Local Transport Plan 4". The second paragraph should be amended to read "The Council will have regard to the improvements identified in the transport studies that underpin the LTP 4 in considering development proposals to ensure .....". The third paragraph should be amended to read "The Council will assist in delivering pedestrian, cycle, public transportation and public realm improvements in Aylesbury Town Centre by having regard to the Aylesbury Garden Town initiative and Aylesbury Transport Strategy as well as ....."

For clarity T3 could be amended so that it provides: "In deciding which transport proposals to support, the Council will have regard to those identified in the Aylesbury Transport Strategy and Buckingham Transport Strategy."