

Inspectors Q38:

The Inspector would welcome the Council's observations on the representations from Mr Michael Wood of Indigo planning Ltd on behalf of Lands Improvement Holdings and from Andrew Blackwell of Wessex Environmental Planning on behalf of Vanderbilt Strategic and Redrow Homes concerning the justification for the specific provisions of allocation AGT1.

Representation:

(Lands Improvements Plc/Indigo Planning):

South Aylesbury (D-AGT1):

The proposed allocation at South Aylesbury seeks the development of 1,000 dwellings, a primary school, a local centre, green infrastructure, a link road between Lower Road and Wendover Road and an 'Aylesbury South East Link Road' between the A413 and B4443.

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 in order to avoid (as the Plan indicates at paragraph 4.32) a piecemeal outcome that would flow for a site-by-site approach. 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.

It is also notable that the allocation is dependent upon the delivery of HS2 and infrastructure associated with it, with such localised impacts derived from HS2 not yet being fully understood. Accordingly, the developable area of the site cannot be regarded as completely certain. Furthermore, whilst Royal Assent has now been granted to the HS2 bill, such that its eventual implementation is all but guaranteed, there is clearly potential for a project of this scale to experience significant and unexpected delays.

We note that draft Plan Policy D-AGT1 recognises that the South Aylesbury Allocation will come forward during the latter part of the Plan period and "only once a Masterplan SPD for the allocation has been prepared and adopted by the Council". Likewise it is noted that two parts of the allocation do already benefit from outline consents ('Land South of Stoke Mandeville' and 'Land Straddling the Railway Line North of Stoke Mandeville'). However it is nevertheless the case that a comprehensive masterplan must be prepared before the greater proportion of the proposed dwellings can be delivered. Accordingly, whilst there are merits to allocating land at South Aylesbury and the site does appear to be largely developable, there are clearly some risks of delayed delivery on those parts of the site which are particularly likely to be affected by HS2. This external influence is not within the control of the developer interests or the Council. Taking this into account, it should be recognised that some of the planned 1,000 dwellings may not come forward within the Plan period.

AVDC Response:

The requirement of an SPD supports the rationale for a masterplan led approach to the development of the allocated site which will consider all land ownership interests and a defined delivery mechanism. The consultation required for an SPD will allow all interests to take part in the development of the SPD and the council is required to take account of representations under the relevant regulations.

AVDC have undertaken an exercise to identify the specific site owners and promoters of AGT1 and have entered into discussions about committing to the provisions contained within a Site Delivery Statement which will confirm the intentions to submit, start and complete the proposed development identifying the delivery rates and construction timings. This commitment also acknowledges the infrastructure requirements.

An added reason to identify the additional land is to ensure it is available for the construction of the South East Aylesbury Link road which is a critical link identified to ensure the orbital network. Should the land not be offered for development the council will need to consider the utilisation of powers to acquire the land.

It should be noted that in paragraph 47 the NPPF only requires five years worth of deliverable sites to be identified. For later years sites only need to be developable and it is considered that this site meets that definition and is therefore a suitable allocation. Any slippage in expected delivery can be addressed through the buffer set out in the VALP housing provision or through the proposed early review of the plan.

Representation

South West Aylesbury (D-AGT2):

This proposed allocation comprises circa 112 hectares of land, consisting of three sites, which are cumulatively intended to deliver approximately 1,550 dwellings, a primary school, green infrastructure, strategic flood defences. Furthermore, the allocation is intended to provide a South West Link Road between the Stoke Mandeville A4010 realignment and the A418, with junction improvements at the A413 and A418.

The southern boundary of the site will be formed by the HS2 route and there is a requirement to include an appropriate buffer. The site is also constrained by areas of flood risk, with new road and rail infrastructure being likely to displace existing areas of flood plain. It is unclear how the cumulative impacts of securing a HS2 buffer and addressing matters of flood risk and drainage (requiring future modelling to account for climate change) will affect the overall developable area of the allocation. This is a salient point, as the draft policy indicates that built form should be restricted to Flood Zone 1.

Significant new road infrastructure is required together with strategic-level flood defences, and (as previously stated) there remain concerns as to how such infrastructure is to be financed. Draft Policy D-AGT2 indicates that a Masterplan and Delivery SPD will be required before the allocation can come forward, with the delivery of the site being anticipated to occur at the end of the Plan period.

The uncertainty surrounding the impact of HS2, and the complex flood risk issues that affect the site, is such that the delivery of approximately 1,550 dwellings cannot be guaranteed;

particularly as the policy advocates that development of the site should follow the extensive and arguably proscriptive Aylesbury Garden Town Principles set out in draft Policy D1.

AVDC Response:

D-AGT2 has been subject to a full site assessment including traffic modelling and SA screening. AVDC have also been engaging with the site promoters in terms of agreeing a Site Delivery Statement confirming when the site will come forward and be delivered including the required infrastructure to mitigate its impacts. The site promoters have also been in liaison with HS2 and are fully informed of the programme of works related to HS2 operations.

Also, as set out in paragraph 4.45 of VALP, only one part of the site for 190 houses is to deliver in the next five years with later phases delivered later in the plan period. The sites therefore only need to be developable to accord with national planning policy and it is considered that the allocation meets this requirement. Further the housing provision within the plan contains a buffer to address any slippage in delivery and the proposed early review of the plan will allow slippages to be addressed by including new site allocations.

Representation

Rabans Lane, Aylesbury (D-AYL115)

5.29 This employment site is identified as potentially available for redevelopment, with a capacity of 200 dwellings being indicated. The policy for this proposed allocation suggests delivery could occur within “1-5 years of VALP adoption”. However, the Housing Economic Land Availability Assessment (October 2017) indicates that 100 dwellings could be delivered in years 1 to 5, with a further 100 in years 6-10. It is also noted that the site remains suitable for commercial use. Accordingly, we consider that the projected delivery rates for this site are unrealistic and not justified by the Council’s evidence base. Furthermore, in the absence of a planning application, there is necessary doubt as to the likelihood of delivery, particularly as the commercial occupier remains on site.

AVDC Response:

AVDC have entered in to negotiations with the site promoter in the context of a signed Site Delivery Statement and have received confirmation on delivery rates and start and completion timeframes. It is important to note that the HELAA is only an estimation of delivery rates and more detailed information available since its production confirms that the expectations within VALP are realistic. One such piece of information is that the units on the site are bespoke to the current operation and the lease on the property will not be extended so the operation will cease and the units are not viable for other commercial uses. It is therefore considered that the site is not suitable for protection as an employment site in the long term in conformity with paragraph 22 of the NPPF.

Representation

Allocations at Milton Keynes

Land at Salden Chase is subject to planning application ref. 15/00314/AOP. This seeks outline permission for 1,855 dwellings, with all matters reserved save for access. The

application benefits from a resolution to grant, as agreed by Committee in June 2017. However (at the time of writing) permission has not yet been granted and (accordingly) no reserved matters or discharge of conditions submissions have been made. Likewise, the paragraph 4.118 of the Proposed Submission Local Plan indicates that a Masterplan SPD will be required to establish the disposition of land uses should a scheme for redevelopment be progressed. It then doubtful that 60 units will be completed in 2020/21, which is when the Housing Land Supply Soundness Document (2017) envisages the first tranche of dwellings will be built out.

AVDC Response:

Due to the advanced nature of negotiations between SWMK consortium and AVDC it is envisaged that that the s106 will be signed and a Reserved Matters consented in time for the first 60 units to be completed before 2021.

- General Historic England points are to be addressed in the answer to Q21
- General Water Utility points are to be addressed in the answer to Q48