

## Inspectors Q78

I would welcome the Council's observations on representations 436, 437, 441 and 448 from Mr Adrian Harford of AOTRA commenting on policies D7 and D8.

### 436 Adrian Harford of AOTRA

1. The first paragraph of Policy D7 deals with the proposed redevelopment site stretching from Exchange Street car park to the Royal Mail sorting office. This area in fact consists of four parts: (a) the Exchange Street car park (also known as Waterside North), (b) the middle High Street, (c) the area between High Street and Upper Hundreds Way and (d) the Royal Mail sorting office.

2. The Waterside North site has been allocated for shopping development for nearly 20 years. Several schemes have come and gone and planning applications have been heralded but not materialised, apart from the block of flats over restaurants currently under construction on part of the site (Phase 1). In the light of the vacant BHS shop in Friars Square, and the announced intention of House of Fraser not to renew the lease after 2018 of their premises, also in Friars Square, it seems that early progress on Phase 2 of the development is unlikely. However, AOTRA agrees that this site should be developed as the next stage in the expansion of Aylesbury's shopping core, but Policy D7 should make it clear that the main frontages here should be Primary Frontages, and that the chestnut trees adjoining Exchange Street should be retained.

3. Middle High Street currently functions well as a secondary shopping area. Whilst some redevelopment of its south side to link with the Waterside North site is essential, its comprehensive redevelopment, even if necessary, is not urgent. In any event it is likely to prove difficult because of the multiplicity of ownerships and the threat of redevelopment is likely to deter owners from making their own investments in improvements, leading to a downward spiral. Earlier attempts to incorporate the Roman Catholic church into the Waterside North site met with strong opposition from the congregation. The development of both sides of middle High Street was considered in HELAA (Reference AYL061 and AYL062). This concluded:-

AYL061 "Unsuitable- Entire site falls within Flood Zone 2/3. The site has very limited scope for a mixed use development although there is no indication the site is currently available for development. The site also has potential access issues to address.

AYL062 "Unsuitable - Site has potential to introduce residential upper layers through conversion (not demolition of 19th Century buildings) of upper units provided that it does not prejudice the operation of the retail units. Site has planning permission (10/01928/APP) for conversion of first floor flat into two flats with additional accommodation in roof space but is below the HELAA threshold. There is no indication the site is being promoted together and is available as a single development site. If there were interest in a

comprehensive development as a single site retaining ground floor retail then a proposal could be suitable in principle."

We therefore suggest that middle High Street should be deleted from the redevelopment proposals in policy D7, apart from essential links to the Waterside North development.

4. Assuming that priority in providing new shopping is given to the Waterside North site then further redevelopment will not be required until late in the Plan period. The Hale Street/Railway street area would undoubtedly be the best location for additional shops and other town centre uses, if required. However, the Plan proposes that Hampden House should be converted to flats (upper floors) (Policy D-ATL063) and redeveloped. Clearly this is not possible and so we suggest that the site of Hampden House should be removed from the redevelopment area but retained as a housing allocation (conversion).

5. We see no current case for redeveloping the modern building occupied by Wilko, which appears to be well-used. The Upper Hundreds car park is unlikely to be needed for redevelopment until very late in the Plan period. It is owned by AVDC and can continue to be used for parking until required for other uses. If and when the Royal Mail sorting office site becomes vacant it should be acquired by AVDC for use in the long term as a possible overflow to accommodate town centre uses which cannot be located within the Inner Relief Road. In the mean time it could be used as a surface car park. Whilst residential use may eventually be appropriate on upper floors of any redevelopment here, we suggest it is premature to allocate this site for housing at this stage (Policy D AYL052).

6. The committed development site AYL056 in Cambridge Street/New Street consists of the Churchill Homes site currently under construction, the long empty office blocks at Sloane House and the former Government Offices, both of which have a permission for conversion to flats which has not yet been implemented, and the Sainsbury's car park. In our view this site (excluding the Churchill development) could be used for a mixed-use redevelopment including retail, parking (beneath or above the shops) and possibly some residential. This would entail the demolition, rather than the conversion, of the empty and semi-derelict office blocks but could be linked very effectively with the Primary Shopping Area via Buckingham Street (and Sainsbury's) and Cambridge Street (with its entrance to M&S) to form a shopping circuit. Indeed this site could become part of the PSA itself. We think this would be a more practical proposition than redeveloping Wilko, the adjoining fitness gym and Upper Hundreds car park, would be better located in relation to the PSA than the PO sorting office and could also be delivered earlier. It may well be that in the long run all of these sites will be needed to meet Aylesbury's shopping needs.

#### AVDC Response:

1. AVDC considers Policy D7 is a summary of the extent of the site and the VALP policy does not identify character areas within it – that level of detail is

more suited to the Aylesbury Town Centre Plan, 2014 which has informed the VALP.

2. AVDC is actively looking at the Phase 2 of Waterside North site (now known as The Exchange) and how a mixed-use scheme could be brought forward, taking account of the very dynamic and challenging market conditions, particularly in respect of retail. However, there are no immediate proposals before the Council. As a result the VALP does not set out specific timescale for the development to take place nor of any of the Action Plans referred to in VALP para 4.215.
3. The Middle High Street is important for connections through from The Exchange development site to the High Street and the High Street to Cambridge Street and Aylesbury Shopping Park. Middle High Street is also important for the regeneration of the High Street but there are no current proposals to redevelop the Middle High Street. The quotes in the representation section 3 are from the HELAA report which was a study of sites promoted to the Council for housing development, at least most of the sources of sites that fed into the study were where the Council was aware of a promoted housing development, particularly planning applications, rather than other land uses. It cannot therefore accurately inform consideration of other uses.
4. Hampden House is a key site within the Town Centre and is part of the Town Centre Plan 2014 and part of an Action Plan for redevelopment. There has been interest from the site owner in recent years (a planning application was withdrawn in 2014) to convert Floors 1-4 of the former offices to housing and a permitted development was granted in 2017 for apartments. AVDC is currently in discussions about how best to bring forward the site but there are currently no substantive proposals before the council .
5. AVDC has a signed Site Delivery Statement with the site promoter of AYL052 - Cushman and Wakefield on behalf of Royal Mail Group. A planning application is expected to be submitted in 2018/19 with development under construction by 2020/21. The site is a gateway site to the town, a busy location and another key element of the Aylesbury Town Centre Plan. There is an existing mixed use development with planning permission granted in July 2015 (13/00831/APP) on the land around Sainsburys and its car park. Part of the development i.e. the retirement homes is already under construction and AVDC is keen to see the rest of the development carried out. Beyond that any further implications such as for the future of land at Wilkinsons/Upper Hundreds Way and Cambridge Street are longer term. AVDC doesn't have any detailed views of how land around Wilkinsons could be redeveloped and none of the land is currently in its ownership. All the Town Centre Plan Action Plans are fluid and the Council is open to suggestions via at the Town Centre Plan Steering Group which meets regularly to oversee the delivery of the action plans and review new suggestions submitted by stakeholders.

## 437 Adrian Harford of AOTRA

### Proposed Transport Hub

1 The only justification given for this proposal is "as part of the overall vision for the town and to ensure the town remains accessible". Whilst the existing bus station needs improvement and a co-location with the railway station would facilitate bus/rail interchange, this would in our view be at the expense of making the primary shopping area and other town centre locations less accessible to bus users, despite the promise of connectivity improvements to the rest of the town. What proportion of bus users begin or continue their journey by rail as opposed to using buses to access the town centre?

2 The 2016 Aylesbury Transport Strategy summary (page 13) says:-  
"Upgrade the existing bus station in Aylesbury town - Increase capacity and possible relocation or expansion to a second site in the long term, possible locations need to be considered. Also review accessibility to current site" and also says that the upgrade is to be carried out in the medium term (2020 - 2025). The main Strategy document itself (page 86) says:-

"Upgrade the existing bus station in Aylesbury town - It aims to increase the number of bus passengers by increasing the capacity, comfort and accessibility of Aylesbury bus station. The accessibility improvements would create a proper interchange with the railway station (Aylesbury), and improve links with the cycle and the pedestrian networks. There is a longer term ambition to extend or relocate the bus station, and alternative formats such as a series of mini bus hubs around the town centre could also be considered. Providing that any new provision meets the current and future needs of passengers and bus operators. This should be a key driver of a future public transport strategy."

No evidence is cited in the Local Plan to change this. However the Local Plan proposes a major redevelopment (the Transport Hub) to include, inter alia, a new bus station co-located with the railway station, involving the relocation of Morrisons supermarket, and the possible re-routing of Friarage Road. It is unclear whether this proposal also involves the redevelopment of the the Station Way (Friars Square) multi-storey car park and the station surface car park. No details are given as to where the supermarket will be re-located, nor is any given as to how the relocation of the bus station will meet "the current and future needs of passengers and bus operators" as required by the Transport Strategy quoted above.

3 Altogether, the proposed Transport Hub needs much more justification. Without it, it should be deleted from the Plan.

### **AVDC Response:**

The Aylesbury Transport Hub is informed by the Aylesbury Transport Strategy (CD/TRA/004) and Aylesbury Town Centre Plan (CD/RET/006) which both indicate that public transport access is a priority for the town centre. The hub is justified at para 4.225 and paragraph 3 of Policy D7.

The specific proposal for the Transport Hub has come from the Aylesbury Transport Strategy which has the Project listed in Table 6.9 Town Centre Transport Improvements as Upgrade the existing bus station in Aylesbury town. The supporting text states that “It aims to increase the number of bus passengers by increasing the capacity, comfort and accessibility of Aylesbury bus station. The accessibility improvements would create a proper interchange with the railway station (Aylesbury), and improve links with the cycle and the pedestrian networks. There is a longer term ambition to expand or relocate the bus station, and alternative formats such as a series of mini bus hubs around the town centre could also be considered, providing that any new provision meets the current and future needs of passengers and bus operators. This should be a key driver of a future public transport strategy. Without recognition in VALP of this long term need it is possible that this key opportunity to address a key town centre issue may be lost.

The transport hub proposal is also trying to capitalise on the new opportunities offered by East-West Rail services discussed in the VALP which will serve Aylesbury railway station.

#### 441 Adrian Harford of AOTRA

This policy should be extended to include the gist of the second paragraph of Policy D7 and become the overall general policy for the town centre, ideally placed before policy D7.

Although the Plan contains a policy (E6) relating to Primary and secondary Frontage within the PSA, it does not contain a policy which differentiates between shopping proposals within the PSA and elsewhere in the TC. This does not accord with the NPPF which requires local plans to make clear which uses will be permitted in PSA's and TC's respectively. An appropriate policy should therefore be added to Policy D8. It should also include reference to pedestrian priority and the protection of the amenities of residents.

#### AVDC Response:

The Plan Policy D7 second paragraph and Policy E6 covers the Town Centre shopping frontages whereas D8's purpose is to cover retail and other main town centre uses elsewhere within Aylesbury Town Centre in accord with the NPPF. Policy E6 does state which uses will be permitted within the PSA – they are A1, A2 and A3 uses (at ground floor). Policy E6 goes on to identify that retail uses are supported and also appropriate non-retail uses, as long as a proposal would meet criteria (c), (d) and (e) in the policy.

In terms of a definition of retail and main town centre uses supported in the

Town Centre as a whole (Policy D8) these uses are defined in the NPPF (2012) Annex 2: Glossary.

It is not considered necessary to add a specific reference to pedestrian priority and protection of amenities residents as this is already covered in the VALP at Policy BE3 (Amenity of residents), Policy C4 (Protection of public rights of way) and Policy T6 (Footpaths and cycle routes).

#### 448 from Mr Adrian Harford of AOTRA

There is an urgent need for an adopted plan but the current proposals are unjustified or silent, and therefore unsound, in respect of leisure and entertainment, parking in the town centre and bus service improvements.

Paragraph 4.229 briefly discusses leisure and entertainment but does not lead to any proposals. Paragraph 4.222 promises a parking strategy which will emerge 'shortly'. The Transport Hub proposal is lacking in justification.

To overcome these problems we have put forward in separate detailed representations a cohesive package of interim proposals for the Town Centre which include:-

- a) A revised and expanded Primary Shopping Area;
- b) A revised Town Centre boundary;
- c) A redevelopment site for retail and other uses at Exchange Street car park;
- d) Provision for further redevelopment for retail and other uses on undefined sites in the Hale Street/Railway Street and Cambridge Place/New Street/Cambridge Street areas;
- e) A reserve, mixed use redevelopment site on the Post Office sorting office land;  
and meanwhile
- f) Removal from the plan of the Transport Hub proposal and the redevelopment allocations covering middle High Street and the land to the North.

We believe that the plan would become sound if it were to be amended to incorporate these changes, provided that an early review of the Town Centre is carried out taking account of further studies on leisure and entertainment, parking and bus service requirements and various practicability issues.

#### AVDC Response:

Para 4.229 is a statement in the plan seeking to safeguard the town centre community facilities and assets of community value. The actual policy where this statement is taken forward (though referring to all community facilities in the district) is Policy I3. Therefore it is this policy that gives the objective in para 4.229 more weight.

There is a separate Aylesbury Town Centre Plan from 2014 (CD/RET/006).

What the VALP is trying to do is take elements from that plan that have yet to be delivered and are in need planning policy to help deliver the proposals. It is not the purpose of the VALP to replace the Town Centre Plan with an unjustified and speculative alternative unrelated to the existing Town Centre Plan. Paragraph 4.215 of the VALP sets out Action Plans (from the Aylesbury Town Centre Plan) for areas in the town centre.

The Aylesbury Transport Hub is informed by the Aylesbury Transport Strategy (CD/TRA/004) and Aylesbury Town Centre Plan (CD/RET/006). The hub is justified at para 4.225 and paragraph 3 of Policy D7.

The town centre boundary has taken forward the recommended boundary from page 78 of the Aylesbury Vale Retail Study (2015) (CD/RET/001a).

Policy D8 is a supportive policy to encourage retail and other town centre uses as defined in the NPPF to locate elsewhere in Aylesbury Town Centre. The VALP Policy S2 sets out the retail/other land uses needed for the district and where this should be located and allocates land for retail in and around the town centre at AYL052 (PO Sorting Office, Cambridge Street) and also in the Garden Town site allocations. The floor space requirements (comparison and convenience retail) are set out in VALP 4.217-4.224.