

Inspector's question 86

My Q1 has already sought the Council's observations on the implications for rural life of the development distribution strategy of policy S2. My Q29 added to that a request for the Council's observations on a number of representations made in respect of the spatial distribution strategy in terms of housing provision. To that, I now add representations 1342 Rebecca Howard of Ingleton Wood LLP on behalf of Ikram Haq of High Barrow Holdings, making a similar point in relation to employment uses.

Representation

Rebecca Howard states that paragraph 1.8 of VALP states that the Local Plan has to take account of "what is expected to happen to the area's population up to 2033", but fails to appropriately consider alternatives and the likely significant developments from the Oxford-Cambridge Corridor and thus wider distribution of growth across the District. The preferred growth strategy concentrates over 75% of all housing development at existing strategic settlements. This strategy is based on the capacity approach and the delivery of such high levels of housing in few locations is not considered to be achievable. The preferred strategy is not considered to distribute growth across the entire district thus starving existing communities of the opportunities to grow and provide the infrastructure and facilities that they need. The distribution of growth to such smaller settlements across the district has failed to be considered as a reasonable alternative. The Sustainability Appraisal (SA) of the Vale of Aylesbury Local Plan (September 2017), states that a more dispersed approach was examined, however this approach was not considered a 'reasonable alternative' given it would require 'further detailed work' (para 3.3.7). No further detail is provided within the SA of such work. It is therefore questioned whether such work has been carried out. If this reasonable alternative has indeed not been properly considered, then the VALP is considered to fail this test of soundness.

AVDC's Response

The Council acknowledges the representations from Rebecca Howard. Whilst it is acknowledged that the allocated housing sites in VALP are generally concentrated at the existing strategic settlements, the representation does not take into account the fact that many of the villages have housing allocations 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 paragraph 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.

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.

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.