

# Vale of Aylesbury Local Plan Regulation 18 - Scoping Summary Report

June 2014



Agent Organisation  Agent Name  Agent Alias

Uniform Ref   Keep\_informed  Duty to Co-operate Body

Customer Alias  Customer Name  Organisation

Customer\_Class

Summary of Comments

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## Summary of Comments

Question 1 – Yes  
Question 2 – Yes. In relation to the "Call for Sites" there should also be an opportunity at this stage of the process to identify sites that should not be developed. For example sites which could lead to communities merging with other local communities, sites to preserve open spaces, to preserve a locally cherished view or area of ecological value that might not be otherwise designated. If doctors, schools and pharmacies are not included in point 6 relating to infrastructure, then these should also be included.  
Question 3 – Yes • The identity of local communities should be protected within these policies. It is important that these are maintained to protect environmental asstes, historical features (natural and built) and preferred amenity value. • The impact on the local community of proposed developments should also be taken into consideration. For example, should a sizeable development be proposed that includes retail facilities, the consequent impact on the viability of shops in nearby local communities should be assessed. • The VALP strategy and policies should not undermine any adopted or emerging Neighbourhood Plans. • Instead of a one size fits all approach, the particular challenges faced by smaller communities when encountering even modest-development should be acknowledged and policies tailored to protect and assist these communities. • Local residents and representatives should be consulted and their opinions taken into account by AVDC where there is no Neighbourhood Plan in place or being planned as they are the ones that know more than most the impact of developments on the local community. • The Community Infrastructure Levy should go to the communities directly affected by the development it relates to.  
Question 4 – No

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## Summary of Comments

Question 1 – Yes  
Question 2 – No  
Question 3 – It is important that the plan is specific and comprehensive and that sufficient strategic sites are identified so as to meet the development needs of the district.  
Question 4 – The plan has been through so many iterations that it is crucial that it now provides a strategic framework for the development needs of the district.

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## Summary of Comments

Question 1 – The policy topic areas are appropriate for inclusion.  
Question 2 – The following development management policies should be considered: rural development, public access and flood risk management. Question 3 – A rural development policy should be included to identify a reasonable approach to establishing farm worker accommodation in rural areas, as well as providing opportunities for farms to diversify operations.  
Question 4 – No Comment

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## Summary of Comments

### Question 1 – Yes

Question 2 – The following should be included: • During the VALP Plan Period the number of over 65s in Aylesbury Vale will increase by over 50%, thus needs to be an overarching strategy included in the plan, it should include: housing, community activities, facilities and public transport etc. • Policy for car parks and car parking is required (for the larger communities in The Vale) to meet current and future demand. • Policy to protect and enhance the High Street offer of the larger communities. Need to prevent a new significant supermarket presence on the outskirts of a community (less than 10,000). Suggests a threshold of lower than 25,000 sq m (suggested in VAP) would prove totally inadequate. • There needs to be some clarity about the arrangement with Community Impact Bucks setting up an overarching Community Land Trust and where that would fit into the VALP. • Consider the creation of Rural Employment Hubs (REH). Smaller communities could be encouraged / obliged to contribute to their delivery. Could also encourage the conversion of disused barns for employment use and potentially providing a REH for smaller businesses. WTC are aware of demand for small employment properties. Policy should consider how to persuade developers of this social need.

Question 3 – Yes, specific suggestions: • All communities, from small villages upwards in size, should provide at least a further 15% more homes from 2011 to 2031 in order to meet the needs of their community and to share the very significant load placed on the District. • Haddenham, designated by AVDC as a Strategic Settlement, should be expected to provide for significantly more housing than just meeting its local needs. It has sufficient facilities and connectivity (railway, employment, close to Thame & retail offer, road links). For the past 30 years, Haddenham's population has barely changed, contrast this with Winslow which has seen a 50% increase it also doesn't have the same facilities and connectivity. Haddenham has the scope and infrastructure to support growth and should therefore be expected to deliver appreciably more new homes to 2031 than Winslow. • Affordable Housing.- Maintain 35% for developments of 15 dwellings and above and 20% for those of 5 to 14 homes, and address the issue of seamless distribution and cluster sizes being relative to the scale of the development. • Housing Mix. Need for clarity in the Policy that it is essential for the mix of market housing in future developments, in accordance with the recommendations of the G L Hearn Housing study, includes a significant proportion of smaller homes (1 and 2 bed) to not only address demand but past shortfall. In addition, WTC also support the 6 points raised by North Bucks Parishes Planning Consortium, as follows: 1) Against community coalescence. Maintaining settlement identity is the most sustainable way to protect environmental assets, historical features (natural and built) and preferred amenity value. 2) An important indicator of sustainable development must be the development's impact on nearby settlements, e.g. should a sizeable development be proposed that includes retail facilities, the consequent

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impact on the viability of shops in nearby market towns should be assessed. 3) The VALP strategy and policies should not undermine any adopted or emerging Neighbourhood Plans. 4) VALP should contain a specific community-led development plan to detail how AVDC will assess planning applications for community-led developments. 5) Instead of a one-size-fits-all approach, the particular challenges faced by smaller communities when encountering even modest-development should be acknowledged, and policies tailored to protect and assist these communities 6) Where there is no Neighbourhood Plan in place or being planned, it is still incumbent on AVDC to take local opinions into account. Local residents and their first-tier representatives know the areas better than anyone.

Question 4 – YES, as follows: In the Glossary of the Local Development Scheme document, defines a Neighbourhood Plan. This definition gives the incorrect impression that a community cannot develop a Neighbourhood Plan unless there is an adopted current up to date Local Plan in existence, which is unnecessarily misleading and could persuade a community to delay starting a Neighbourhood Plan. The reality is, as is made clear in the National Planning Practice Guidance, that a Neighbourhood Plan most certainly can be developed in the absence of such a Local Plan. It would seem appropriate for the VALP Development Management Policies to have a Policy of Neighbourhood Planning. In the Consultation Document in the contents and Scope sections, neither Neighbourhood Plans nor Neighbourhood Planning is mentioned.

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Uniform Ref	<input type="text" value="00091"/>	<input checked="" type="checkbox"/> Keep_informed	<input type="checkbox"/> Duty to Co-operate Body			
Customer Alias	<input type="text" value="Mr G Watts"/>	Customer Name	<input type="text" value="The Wendover Society"/>	Organisation	<input type="text"/>	
Customer_Class	<input type="text" value="Community or Stakeholder group"/>					

## Summary of Comments

Question 1 – Yes

Question 2 – Not that we can identify.

Question 3 – Housing: The number of new homes to be allocated to Wendover should be restricted to a maximum of the 30 windfall developments previously identified. Green Belt: There should be no erosion of, or permitted development within, either the Metropolitan Green Belt or Chilterns AONB (which surround the built footprint of Wendover). Community Facilities: There is an acute shortage in Wendover of town centre parking, now further exacerbated by the additional pressures that the Princes Mary Gate development has occasioned, and this should be rectified.

Question 4 – No

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## Summary of Comments

Question 1 – Yes, subject to the following comments: The Parish Council believes that the spatial strategy and vision should be specific to the needs of the district. Housing and job numbers need to be ambitious but realistic to reflect the need for housing and growth. Parish and Town Councils should be consulted on site allocations within their local communities. Future management of community facilities should be secured at the outset of development.

Question 2 – Yes A transport strategy is needed for the area, to include the impact of HS2 and East West Rail.

Question 3 – Strategic planning should include provision for infrastructure to be put in place before development begins.

Question 4 – Villages should keep their own identities and not be joined to the town or other villages.

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<input type="checkbox"/> Agent	Organisation	<input type="text"/>	Agent Name	<input type="text"/>	Agent Alias	<input type="text"/>
Uniform Ref	<input type="text" value="00462"/>	<input checked="" type="checkbox"/> Keep_informed	<input type="checkbox"/> Duty to Co-operate Body			
Customer Alias	<input type="text" value="Miss S Lindsey"/>	Customer Name	<input type="text" value="Whaddon Parish Council"/>	Organisation	<input type="text"/>	
Customer_Class	<input type="text" value="Parish or Town Council"/>					

## Summary of Comments

### Question 1 – Yes

Question 2 – Yes, although Whaddon Parish Council supports a call for sites, Councillors have a long held view that if developers and land owners can promote sites, then the general public, parish councils etc. should have the same opportunity at the same time to put forward sites that should be given protection status, or should be avoided due to serious constraints (ecology, archaeology etc), landscape designations, historic interest, coalescence etc. This would alert the authorities that serious concerns exist which could be 'flagged up' early perhaps leading to exclusion, constraint notification or at least saving time at a later consultation stage.

Question 3 – Yes 1) Whaddon village is under threat from MK's expanding boundaries. There is a threat from land-owners and developers, despite public enquiry inspectors reports confirming and recommending that certain land is unsuitable for development (ie. Land to the south and west of the Shenley Ridge and North Buckinghamshire Way). Therefore a specific policy on coalescence is essential and within that should be a formula for protecting land that should be protected from development.2) Whilst saved policies RA.13 and RA.14 are hugely important AVDC must come up with a policy that protects against backland development (parallel development in depth) where such development would intrinsically damage the traditional character and layout of settlements. Two definite barriers against back-land development should be where the pattern of existing development is primarily linear in form, and where intrusive development impacts on conservation areas and general neighbourliness.3) it would be helpful to include a policy that defines a settlement edge, infilling gaps between the edge and historic outlying homes is a regular land owner/developer occupation, and due to a lack of sensible definition can often lead to controversy and lack of understanding. It would also give certainty to land which is not likely to get consent under normal planning circumstances, but might provide the opportunity for a subsidised exception site (ie housing association/ social/affordable/rent etc) if a strong sustainable case is presented and the community supports it for the general good of the settlement. 4) Smaller communities such as Whaddon, may have problems providing a Neighbourhood or Community plan, especially in these uncertain times, where a local plan is still 2 years away, and where so much influence is exerted from outside sources (in our case Milton Keynes growth and traffic generation). It would be extremely helpful to have a policy which helps such communities work with the LA's and applicants, rather than have development forced on them.5) Through development of the Local Plan & rural development policies, it would be helpful for parish and town council's to understand the ground rules. After adoption, extra help and guidance to communities.6) Community Led Projects, is an area that Whaddon Parish Council may consider in the future, as our local housing needs should be led by the community rather than speculative developers. It would be helpful to have 'a lead' or guidance from the local plan as to how this might work in practice and how ideas could evolve.

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Question 4 – No

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Uniform Ref	<input type="text" value="06220"/>	<input checked="" type="checkbox"/> Keep_informed	<input type="checkbox"/> Duty to Co-operate Body			
Customer Alias	<input type="text" value="Ms Sarah Heron"/>	Customer Name	<input type="text" value="Rydon Homes"/>	Organisation	<input type="text"/>	
Customer_Class	<input type="text" value="Developer Interest"/>					

## Summary of Comments

Question 1 – All relevant policy topic areas within its Scoping document of the new Vale of Aylesbury Local Plan included. With regard point 2, Housing and job numbers, and lack of clarity and the conclusions reached by the Inspector at the now withdrawn VAP. For the Plan to be considered “sound” it must be positively prepared, justified, effective and consistent with national policy. The NPPF requires local planning authorities to base local plans on adequate, up-to-date and relevant evidence about economic, social and environmental characteristics and prospects of the area. Assessments of and strategies for housing, employment, retail and associated infrastructure should be integrated, taking full account of relevant market and economic signals. The local plan must ensure that it is positively prepared and based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities whether it is reasonable to do so and consistent with achieving sustainable development in order to be found sound by an Inspector at examination.

Question 2 – No Comment

Question 3 – No Comment

Question 4 – No Comment

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## Summary of Comments

Question 1 – Yes  
Question 2 – No Comment  
Question 3 – No Comment  
Question 4 – No Comment

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## Summary of Comments

Question 1 – Yes  
Question 2 – The need to consider the needs of the sub-region under the duty to co-operate.  
Question 3 – More houses than in the previously submitted VALP.  
Question 4 – No Comment

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## Summary of Comments

Question 1 - Yes  
Question 2 - No  
Question 3 - No  
Question 4 - No

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Uniform Ref	<input type="text" value="01630"/>	<input checked="" type="checkbox"/> Keep_informed	<input type="checkbox"/> Duty to Co-operate Body			
Customer Alias	<input type="text" value="Mr D Vowles"/>	Customer Name	<input type="text" value="Mr D Vowles"/>	Organisation	<input type="text"/>	
Customer_Class	<input type="text" value="Member of Public"/>					

## Summary of Comments

### Question 1 - Yes

Question 2 – The spatial strategy should set out the role of settlements as regards (i) jobs and housing growth and (ii) retail and service centres. The jobs and housing roles should distinguish between the following planning policy areas: a) Settlements intended to meet more than 'local' needs ie Greater Aylesbury, Buckingham/Maids Moreton, Haddenham (depending on level of growth proposed), Winslow, any villages where more than 'local' growth is proposed and any peripheral extensions to Milton Keynes and Leighton Buzzard; b) Strategic employment sites (such as College Road North, Silverstone and Westcott); c) Settlements where growth is primarily intended to meet local needs (ie affordable housing needs plus any enabling open-market housing) d) Settlements where growth is to be restricted on account of green belt/AONB constraints (ie Wendover and Dagnall) and where local need may not be met in full. Justified jobs and housing figures should be given for each settlement, housing maxima for the villages (as put forward in VAP) should be avoided. The retail/services centre roles should distinguish between: e) Aylesbury - County town and main district centre. May be desirable to have development management policies relating to edge-of-centre locations (eg Aylesbury Retail Park), out-of-centre locations (eg Broadfields) and local centres (eg Jansell Square and Walton Court); f) Buckingham - University and market town serving the north of the district; g) Wendover and Winslow - small market towns serving surrounding area; h) Haddenham - local centre; i) Service villages which act as local centres for surrounding area, including other nearby villages.

Question 3 – Where specific site allocations have not been included in the Plan it will be necessary to provide a basis for Neighbourhood Plans and development management decisions. Suggested policy in relation to settlements falling within category c) (ie all villages except any falling within categories a) or d)) regarding development being in the scale and keeping of local character, within built up area, priority of previously developed sites, regard to commitments, meeting local needs i.e. affordable housing. On-site provision made for at least 50% affordable housing (site above 1 dwelling) or equivalent off-site provision. If unviable then an appropriate alternative level of on-site provision or payment, A similar policy applying to Wendover and Dagnall but with the references to sites adjoining the built-up area and to open-market housing deleted. The required provision of affordable housing here should be increased to 100%. A similar policy to that for the category c) villages should also be included for Maids Moreton, Bierton, Stoke Mandeville, Stone and Weston Turville unless any of these villages is selected for more-than-local growth; and all developments here should reflect careful integration with any nearby growth areas.

Question 4 – Phasing - Phasing of housing development should be specified where necessary to secure the co-ordinated provision of particular infrastructure or services, or where, as in the case of green belt settlements, it is necessary to husband scarce sites in order to meet future local needs. Other wise phasing should be left to market forces. It should not be based on arbitrary, theoretical building rates, as in the

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withdrawn VAP. Housing market sub-areas - The VAP defined 4 housing market sub-areas within the district and gave housing growth figures for each. These were not based on any justified assessment of the needs arising in each area and led to no specific planning policies. The definition of these sub-areas was artificial and added nothing to the Plan, other than unnecessary complication based on unjustifiable figures. The sub-areas should not be used in the VALP, the VALP should be based on planning policy areas. The Strategic Housing Market Area Assessment (or Assessments – it seems likely that the district falls within more than one SHMA) should be used to produce a housing growth figure for the district as a whole. This figure shall then be allocated between the planning policy areas (suggested above) taking into account existing commitments and the local need arising in individual settlements. In the case of settlements selected for growth beyond local needs, the number of dwellings required to meet the needs arising from neighbouring districts (or even further afield) should be carefully distributed taking into account, inter alia, physical and cultural connections within and beyond the relevant SHMA.

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## Summary of Comments

Question 1 - No comment.  
Question 2 – No comment.  
Question 3 – No comment.  
Question 4 – Tingewick Parish Council confirms their policy as submitted in the previous consultation on Development Management policies and would also wish to support inclusion of Policy VS2© of the (now withdrawn) Vale of Aylesbury Plan regarding the criteria applied to housing development in large villages.

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## Summary of Comments

Question 1 - Yes

Question 2 – Yes. On 3 (Site allocations for housing etc) While we support this content, we believe there should also be the opportunity at this stage of the process to identify sites that should NOT be developed: e.g. to preserve open space(s) in settlements; to prevent community coalescence; to preserve a locally cherished view or area of ecological value that might not be otherwise designated.

Question 3 – Yes; • Spatial Strategy and Vision for the District - Should villages be identified as 'smaller' or 'larger' as they were for VAP, then the criteria should be clear, comprehensive and reasonable, and should be respected. This request stems from the arbitrary and inconsistent re-classification of Stewkley as a 'larger' village in the VAP when it clearly did not satisfy the criteria. It appears the change of classification was decided by officers after AVDC members had 'approved' the draft VAP without additional member or Parish Council consultation. • The Spatial Strategy should be supported by a transport / traffic modelling assessment that takes into account development in neighbouring areas (for example: Milton Keynes and Luton, including the airport), and the consequent impact on all relevant communities, not just those captured by an arbitrary radius from Aylesbury. This request stems from the inadequacies of the previous draft Core Strategy, the traffic modelling for which ignored significant proposed expansion at Milton Keynes, and any traffic impact north of Hardwick and Wingrave. • Development Management Policies. We have reviewed our response to the Development Management Policy consultation for VAP and wish all our comments to be taken forward for VALP.

Question 4 – No

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## Summary of Comments

Question 1 - Yes  
Question 2 – Specific sites should clarify the likely numbers of dwellings a site could realistically accommodate given factors such as utilities, road access and infrastructure.  
Question 3 – Specific site designations, likely time frames for coming forward and the number of units anticipated.  
Question 4 – No

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## Summary of Comments

Question 1 - Yes  
Question 2 - We should also identify areas / locations / sites that should be protected from housing, employment, retail, and gypsy / traveller sites. These should have credible reasons for protection.  
Question 3 – Where site allocations for development are identified then limits or regulations should be attached rather than allow developers to decide the volumes per site.  
Question 4 – No Comment

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## Summary of Comments

Question 1 - The Trust agree that these policy topic areas are appropriate for inclusion.

Question 2 - The Trust submit that Community facilities should also include places of worship.

Question 3 – The Trust offer the following suggestions for policies: • Proposals for the provision of new premises, or the change of use of existing premises, for community needs, or for the needs of ethnic or religious groups, be permitted within or adjacent to settlements. •

Proposals for new or improved community facilities will be permitted within development boundaries where they accord with the criteria. •

Facilities will be permitted outside development boundaries where there is a demonstrable local need; no scope for the need being met within the development boundary; significant community benefits; readily accessible by the community; and there is no significant harm to the countryside setting. • Re-use and adaptation of buildings in the countryside for employment purposes where they are permanent and substantial construction; capable of conversion; in keeping with their surroundings; not detract from the character of the building or its setting; potentially harmful impacts can be dealt with by conditions; and complies with other relevant policies in the Plan.

Question 4 – No Comment

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## Summary of Comments

Question 1 - Yes  
Question 2 - Yes; • Transport Policy - See the comments in our email of 06/09/13 on the VAP Consultation. The AVDC area is poorly served by public transport, particularly rail. A strategic policy is required to prevent more cars on our roads with the increased workforce etc; • Protection of Environmental & Heritage Assets - No mention of this which was included in the VAP consultation; • A.O.N.B. - No mention of any policy in VALP which should cover this; • Green Belt Protection - A very important issue which demands a separate policy, not just a minor reference re planning applications.  
Question 3 – No. In our view this is a matter for AVDC planners to prepare and submit for consultation.  
Question 4 – No

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Summary of Comments

Question 1 - Yes  
Question 2 – Healthcare Facilities  
Question 3 – No  
Question 4 – No

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Uniform Ref	<input type="text" value="06463"/>	<input checked="" type="checkbox"/> Keep_informed	<input type="checkbox"/> Duty to Co-operate Body			
Customer Alias	<input type="text" value="Beth Entwistle"/>	Customer Name	<input type="text" value="Barwood Development Securities Limited"/>	Organisation	<input type="text"/>	
Customer_Class	<input type="text" value="Developer Interest"/>					

## Summary of Comments

Question 1 – No Comment

Question 2 – Planning strategically across local boundaries: Local authorities have a legal duty to co-operate on planning issues that cross administrative boundaries and this includes meeting housing needs. Such joint working is to be diligently undertaken for the mutual benefit of neighbouring authorities (NPPF para 178) and Local Authorities are required to work collaboratively in order to identify and meet their development needs (NPPF para 179). It is highlighted that co-operation should be a continuous process of engagement (NPPF para 181). Previously, in response to the Vale of Aylesbury Plan Strategy (VAP) the Inspector concluded the duty to co-operate had not been discharged. He noted the strong relationship with the neighbouring urban area of Milton Keynes, highlighting that Milton Keynes would continue to be a focus of housing growth and employment (paragraph 9). He noted the relationship between Aylesbury Vale and the growth of Milton Keynes has long been recognised as a key issue and in particular the potential for future growth of the urban area, partly or wholly within Aylesbury Vale (paragraph 9). The Inspector also referred to Inspector's Report on the Milton Keynes Core Strategy (May 2013) and in the Core Strategy itself (Policy CS6) adopted in July 2013 which cite the need for joint working and effective co-operation on this matter (paragraph 9). In paragraph 10 of his report on the VAP, the Inspector notes that based on the Validation Study, the Council acknowledges that Aylesbury Vale forms part of a wider Housing Market Area along with Milton Keynes, Central Bedfordshire, Bedford and Luton and accepts that there are interrelationships with other areas and is aware of concerns that due to environmental constraints, a number of authorities may not be able to accommodate all of their identified housing needs and may be looking to Aylesbury Vale to accommodate some additional growth. Recognising that Aylesbury Vale forms part of a wider Housing Market Area that is not confined to its own administrative boundary, it is crucial that AVDC seeks to work with neighbouring authorities such as Milton Keynes from the outset, to gain a full understanding of housing needs.

Question 3 – No Comment

Question 4 – No Comment

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Uniform Ref	<input type="text" value="06145"/>	<input checked="" type="checkbox"/> Keep_informed	<input type="checkbox"/> Duty to Co-operate Body			
Customer Alias	<input type="text" value="Mr Khan"/>	Customer Name	<input type="text" value="Qamar Khan"/>	Organisation	<input type="text"/>	
Customer_Class	<input type="text" value="Developer Interest"/>					

## Summary of Comments

Question 1 - Yes

Question 2 – No

Question 3 – Although overall policy document (VAP) does mention about impact of growth and development due to migration into the area but policies such as VS8, VS9 and VS10 are very locally focused & influenced by local people that in my view are barrier to development.

These policies do not sufficiently cover contributions, rights and interests of other stakeholders i.e. developers, future migrants into Vale, landlords and people who want to invest and settle in the area for economic growth and prosperity.

Question 4 – 50 New homes are allocated for bigger villages in Southern Vale and Northern Vale (VAP) but they should not be constrained only to "within adjoining settlements boundaries" but other criterion should also be considered such as access to transport, roads, rail links and existing access rights so that benefits of growth are equally shared by local resident, developers and other stakeholders.

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## Summary of Comments

Question 1 - No Comment  
Question 2 - No Comment  
Question 3 - No Comment  
Question 4 - I would urge brownfield sites to be redeveloped for housing rather than the beautiful countryside of this area.

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## Summary of Comments

Question 1 - Yes  
Question 2 - Not that I can think of  
Question 3 - No  
Question 4 - Would like to see the old Aylesbury United Football Ground developed - preferably back into a football/sports facility for the club(s) in the town.

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## Summary of Comments

Question 1 - No Comment  
Question 2 - No Comment  
Question 3 – Localism is talked about but there needs to be laid down criteria for attaching weights to the views of people within an area. Not all small Parishes will want to develop a neighbourhood plan, and therefore there needs to be another recognised means of taking the local views into account.  
Question 4 – No Comment

# Vale of Aylesbury Local Plan Regulation 18 - Scoping Summary Report

June 2014



Agent Organisation  Agent Name  Agent Alias

Uniform Ref   Keep\_informed  Duty to Co-operate Body

Customer Alias  Customer Name  Organisation

Customer\_Class

Summary of Comments

# Vale of Aylesbury Local Plan Regulation 18 - Scoping Summary Report

June 2014



<input type="checkbox"/> Agent	Organisation	<input type="text"/>	Agent Name	<input type="text"/>	Agent Alias	<input type="text"/>
Uniform Ref	<input type="text" value="06191"/>	<input checked="" type="checkbox"/> Keep_informed	<input type="checkbox"/> Duty to Co-operate Body			
Customer Alias	<input type="text" value="Mr A Sherwell"/>	Customer Name	<input type="text" value="Alan Sherwell"/>	Organisation	<input type="text"/>	
Customer_Class	<input type="text" value="Member of Public"/>					

## Summary of Comments

Question 1 – Yes

Question 2 – Not sure that it should be formally in the list, but the impact of HS2 I a relevant factor since the last consultation.

Question 3 – The two other changes since the last consultation are the revival of house price growth and the impending shortage of primary places. The former is driven by housing shortage and, if sons and daughters of local people (or, indeed, young people at all) are to be able to live in our County, then the increase in housing supply must be sufficient to stabilise house prices at least in real terms. Secondly, policy must allow the provision of new primary places both through the building of new schools and the expansion of existing ones.

Question 4 – No Comment

# Vale of Aylesbury Local Plan Regulation 18 - Scoping Summary Report

June 2014



Agent Organisation  Agent Name  Agent Alias

Uniform Ref   Keep\_informed  Duty to Co-operate Body

Customer Alias  Customer Name  Organisation

Customer\_Class

Summary of Comments

# Vale of Aylesbury Local Plan Regulation 18 - Scoping Summary Report

June 2014



Agent Organisation  Agent Name  Agent Alias

Uniform Ref   Keep\_informed  Duty to Co-operate Body

Customer Alias  Customer Name  Organisation

Customer\_Class

## Summary of Comments

Question 1 – Yes  
Question 2 – Would like to see infrastructure and its maintenance as well as facilities such as shops, surgeries etc. explicitly stated in the plan if not inferred by section 6 (Infrastructure Delivery Plan).  
Question 3 – No  
Question 4 – Make sure this time that the tie in with adjoining plans is bulletproof and above query. Also reach out to the groups producing Local Plans (i.e. Winslow) so they are as supportive as possible rather than slinging brickbats.

# Vale of Aylesbury Local Plan Regulation 18 - Scoping Summary Report

June 2014



<input type="checkbox"/> Agent	Organisation	<input type="text"/>	Agent Name	<input type="text"/>	Agent Alias	<input type="text"/>
Uniform Ref	<input type="text" value="06178"/>	<input checked="" type="checkbox"/> Keep_informed	<input type="checkbox"/> Duty to Co-operate Body			
Customer Alias	<input type="text" value="Ms C Andrews"/>	Customer Name	<input type="text" value="Camilla Andrews"/>	Organisation	<input type="text"/>	
Customer_Class	<input type="text" value="Member of Public"/>					

## Summary of Comments

Question 1 – Unable to access consultation document on AVDC Website.

Question 2 – Self build opportunities should be included as this is the only way I can think of for young people, on modest incomes will be able to live in a house that is of a sensible size in which to bring up a family. Also one that does not cost too much to run so is well insulated and sustainable. A ring road needed for Aylesbury.

Question 3 – Concerns that AVDC, are looking to house people that may work in Hemel Hempstead or Milton Keynes, as that does not make sense with our current infrastructure and for sustainability. Aylesbury's roads are already heaving with traffic, no sensible route through Aylesbury either North to South or East to West, we need a ring road now. Need more local jobs to accompany housing and need to pay enough to live on and in proportion with cost of houses. Land costs are prohibitive survey, CIL & other charges that are required have consequences on the costs of house. Often houses are built at 3 storeys to make the most economic use of the land. AVDC should make available smaller areas of land for small groups of people to get together to build their own houses (as Bicester are doing with Graven Hill for example).

Question 4 – See question 3, the main road running through Aylesbury goes through a pedestrian area, how can that be right?! We desperately need a ring road. This also should not be an estate road, for the same reasons.

# Vale of Aylesbury Local Plan Regulation 18 - Scoping Summary Report

June 2014



Agent Organisation  Agent Name  Agent Alias

Uniform Ref   Keep\_informed  Duty to Co-operate Body

Customer Alias  Customer Name  Organisation

Customer\_Class

## Summary of Comments

Question 1 - Yes  
Question 2 – Schools and schools places - what is the policy for providing these facilities when extra housing is built?  
Question 3 – No  
Question 4 – No

# Vale of Aylesbury Local Plan Regulation 18 - Scoping Summary Report

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Agent Organisation  Agent Name  Agent Alias

Uniform Ref   Keep\_informed  Duty to Co-operate Body

Customer Alias  Customer Name  Organisation

Customer\_Class

## Summary of Comments

Question 1 – Yes  
Question 2 – Not as far as I can see  
Question 3 – They should reflect 'localism' and take account of the views of existing residents, key stakeholders and in particular businesses who will be, hopefully, be responsible for employment provision.  
Question 4 – I welcome the chance to contribute and trust that the Government interference experienced to date will allow AVDC to create a plan, with its own stakeholders, which will be for the long-term benefit of the area first and foremost, as others will be doing.

# Vale of Aylesbury Local Plan Regulation 18 - Scoping Summary Report

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Agent Organisation  Agent Name  Agent Alias

Uniform Ref   Keep\_informed  Duty to Co-operate Body

Customer Alias  Customer Name  Organisation

Customer\_Class

## Summary of Comments

Question 1 – Yes  
Question 2 – Scoping point 5 should also identify Green Infrastructure which may differ from green belt.  
Question 3 - No comment.  
Question 4 – No comment.

# Vale of Aylesbury Local Plan Regulation 18 - Scoping Summary Report

June 2014



Agent Organisation  Agent Name  Agent Alias

Uniform Ref   Keep\_informed  Duty to Co-operate Body

Customer Alias  Customer Name  Organisation

Customer\_Class

## Summary of Comments

Question 1 – Yes  
Question 2 - need for definitive statement on rural communities and not allowing parish boundaries to be eroded for development sites.  
Question 3 - Local plan must commit to proper use of localism act and ensure that communities are made fully aware and have their views recognised. Local plans should be integrated in with avdc - especially on development, environmental projects, green belt protection and traffic management.  
Question 4 – No Comment.

# Vale of Aylesbury Local Plan Regulation 18 - Scoping Summary Report

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Agent Organisation  Agent Name  Agent Alias

Uniform Ref   Keep\_informed  Duty to Co-operate Body

Customer Alias  Customer Name  Organisation

Customer\_Class

Summary of Comments

# Vale of Aylesbury Local Plan Regulation 18 - Scoping Summary Report

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Agent Organisation  Agent Name  Agent Alias

Uniform Ref   Keep\_informed  Duty to Co-operate Body

Customer Alias  Customer Name  Organisation

Customer\_Class

## Summary of Comments

Question 1 – Yes  
Question 2 – Yes, some plan for sequencing. Aylesbury town is over congested now, so we need to know that infrastructure, roads, rail, hospitals will be undertaken early in any development for housing and business. Other infrastructure, such as schools, doctors surgeries will follow population by families and business. A plan for the plan would be most helpful.  
Question 3 – No comment.  
Question 4 - No comment.

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<input type="checkbox"/> Agent	Organisation	<input type="text"/>	Agent Name	<input type="text"/>	Agent Alias	<input type="text"/>
Uniform Ref	<input type="text" value="00505"/>	<input type="checkbox"/> Keep_informed	<input type="checkbox"/> Duty to Co-operate Body			
Customer Alias	<input type="text" value="Councillor&lt;br/&gt;Cashman"/>	Customer Name	<input type="text" value="Councillor C&lt;br/&gt;Cashman"/>	Organisation	<input type="text"/>	
Customer_Class	<input type="text" value="AVDC Councillor"/>					

## Summary of Comments

Question 1 – No comments.

Question 2 – No comments.

Question 3 - Clear, discrete, detailed and comprehensive policies for heritage and the historic environment need to be set out within the plan (rather than being consigned to Development Management policies). References Paragraph 126 of the NPPF. Such a pro-active strategy requires that Aylesbury Vale should respond energetically in its Local Plan to the guidance in the NPPF and, additionally, the recently introduced PPG to ensure a truly “positive strategy”. Specific points: A. Heritage Assets (i) Recognising the importance of local heritage, AVDC should maintain a list of non-designated heritage assets. (ii) AVDC should be ready to offer free advice to communities involved in neighbourhood planning, and otherwise, to enhance and sustain the significance of heritage assets. B.Design (iii) Clear, discrete, detailed and comprehensive policies for “good design” (para 56) need to be produced within the plan (rather than being consigned to Development Management policies). (iv) To achieve “high quality and inclusive design for all developments” (NPPF para 57) AVDC should respond energetically to the guidance in the NPPF and, additionally, the recently introduced PPG to ensure such an outcome. (v) Recognising the importance of “robust and comprehensive policies” (para 58) for local and neighbourhood plans, AVDC should be ready to offer free advice to communities involved in developing neighbourhood plans, and otherwise, to help deliver high quality outcomes in design.

Question 4 – No comments.

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June 2014



Agent Organisation  Agent Name  Agent Alias

Uniform Ref   Keep\_informed  Duty to Co-operate Body

Customer Alias  Customer Name  Organisation

Customer\_Class

## Summary of Comments

Question 1 – We have no comments to make on the scope or content of the Plan.

Question 2 – No comments.

Question 3 - No comments.

Question 4 - Sufficient capacity is identified within the Milton Keynes Core Strategy (2013) for the current plan period to 2026. While Plan:MK currently being prepared will extend the planning horizon for Milton Keynes from 2026 to 2031, it is clear that sufficient land has already been identified within the Strategic Housing Land Availability Assessment (SHLAA) for Milton Keynes (December 2012) to accommodate all reasonable growth in the extended period. This is shown in the SHLAA Appendix A Table 3 and Appendix C Potential Further Growth Sites plan, with sites for over 15,000 new homes and further windfall sites would add to this total. While not all sites will necessarily be suitable, there is more than enough capacity identified within Milton Keynes to accommodate the expected growth to at least 2031. There is no need to identify land alongside this parish for growth of Milton Keynes into Aylesbury Vale. The authority should resist these prospective incursions. Growth generated within Aylesbury Vale is met best by towns and villages in the Vale.

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Agent Organisation  Agent Name  Agent Alias

Uniform Ref   Keep\_informed  Duty to Co-operate Body

Customer Alias  Customer Name  Organisation

Customer\_Class

## Summary of Comments

Question 1 – Our committee has met and are generally happy with the scope of the Local Plan.  
Question 2 – We feel that if appropriate the following topics should be included either seperately or as part of a wider topic; 1) HS2 particularly its impact on the environment of the western edges of Aylesbury and Stoke Mandeville. 2) Infrastructure provision in particular linking development closely with the availability of infrastructure. As an interesting possibility has any consideration been given to waiving any form of contribution/levy for employment uses and increasing it on residential uses which are in reality basis for infrastructure demand (i.e. schools, water, gas, transport, doctors, dentist, hospital capacity). Sainsbury's had a point recently when querying their 'contribution'. 3) The town centre and the old town are two distinct areas which, in our opinion require separate district policies.  
Question 3 - No comments.  
Question 4 – No comments.

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<input type="checkbox"/> Agent	Organisation	<input type="text"/>	Agent Name	<input type="text"/>	Agent Alias	<input type="text"/>
Uniform Ref	<input type="text" value="00803"/>	<input checked="" type="checkbox"/> Keep_informed	<input type="checkbox"/> Duty to Co-operate Body			
Customer Alias	<input type="text" value="Ms Rose Freeman"/>	Customer Name	<input type="text" value="The Theatres Trust"/>	Organisation	<input type="text"/>	
Customer_Class	<input type="text" value="National Advisory Public Body for Theatres in UK"/>					

## Summary of Comments

Question 1 – Yes, they are all appropriate, but we do not recommend including your retail offer as a community facility as this is strictly commercial and not provided by the public purse, and therefore should require different criteria for location and accessibility.

Question 2 – The word ‘cultural’ is missing. The NPPF and the NPPG both use the term social and cultural well-being. We suggest that to reflect the NPPG the new Local Plan should include cultural well-being through the maintenance and provision of facilities for cultural and leisure activities. We suggest that well-being is having a sense of satisfaction with life. Social and cultural well-being includes the un-measurable personal experiences that make us happy and content. The provision of a variety of community infrastructure for tourism (cultural heritage) and town centre vitality (cultural facilities) etc are vital for their contribution to residents’ and visitors’ life satisfaction.

Question 3 –

- Your community facilities should be defined in the Glossary and within the accompanying text to a policy so that guidelines are clear and consistent. A succinct all-inclusive description which would obviate the need to provide examples: Community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community.
- It would make sense if a higher value were placed on activities which create a reason to visit a town centre in the evening so attention should be given to facilities that enhance the evening economy so that town centres remain lively after shops and offices have closed.
- All development policies should begin with the assumption to protect and enhance before moving onto criteria for new development.
- It is important to ensure that there is a robust policy requiring the replacement of an existing community facility where development would result in their loss. This is particularly so where land values could be much higher for other uses, especially in town centres.
- Access to community, culture and social activities should be set out in a development management policy to ensure any appropriate development proposals are controlled in a manner that would not result in a negative impact on the local area or community, by directing new community, cultural and arts venues to the most sustainable locations within the District. The policy should seek to protect existing culture and social activities and encourage more cultural and arts development where required. This relates to ‘social and cultural well-being’ as above in Question 2. Not to be confused with ‘cultural heritage’ which are ancient monuments, landscapes, parks and gardens – your cultural facilities include theatres (sui generis), cinema (D2), concert halls, music venues (usually in pubs), museums, libraries and art galleries, and you may wish to provide a description for these also for clarity.

Question 4 – Item 70 in the NPPF (page 17) states that to deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should plan for the use of shared space and guard against unnecessary loss of valued facilities. Also to ensure that established facilities and services are retained and able to develop for the benefit of the community. Item 156 of the NPPF states

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that local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver the provision of health, security, community and cultural infrastructure and other local facilities.

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<input type="checkbox"/> Agent	Organisation	<input type="text"/>	Agent Name	<input type="text"/>	Agent Alias	<input type="text"/>
Uniform Ref	<input type="text" value="01021"/>	<input checked="" type="checkbox"/> Keep_informed	<input type="checkbox"/> Duty to Co-operate Body			
Customer Alias	<input type="text" value="Ms R Webb"/>	Customer Name	<input type="text" value="North Bucks Parishes Planning Consortium"/>	Organisation	<input type="text"/>	
Customer_Class	<input type="text" value="Community Group"/>					

## Summary of Comments

Question 1 – Yes.

Question 2 – Regarding the call for sites/allocations: While we support this content, there should also be the opportunity at this stage of the process to identify sites that should NOT be developed: e.g. to preserve open space(s) in settlements; to prevent community coalescence; to preserve a locally cherished view or area of ecological value that might not be otherwise designated.

Question 3 – • Our members have always been against community coalescence. Maintaining settlement identity is the most sustainable way to protect environmental assets, historical features (natural and built) and preferred amenity value. We acknowledge the presumption in favour of sustainable development per the NPPF; one crucial indicator of sustainable development must be the development's impact, and developments' cumulative impact, on nearby settlements. For example, should a sizeable development be proposed that includes retail facilities, the consequent impact on the viability of shops in nearby market towns should be assessed. • The VALP strategy and policies should not undermine any adopted or emerging Neighbourhood Plans. VALP should contain a specific community-led development plan to detail how AVDC will assess planning applications for community-led developments. Please refer to East Cambridgeshire's interim policy at: <http://www.eastcambs.gov.uk/sites/default/files/SPD19%20Interim%20policy%20guidance%20on%20community%20led%20dev%20Dec13.pdf>. • Instead of a one-size-fits-all approach, the particular challenges faced by smaller communities when encountering even modest-development should be acknowledged, and policies tailored to protect and assist these communities. • AVDC need to formalise a process for small villages where no Neighbourhood Plan is in place or intended: planners must evidence and justify how they have assessed and considered local opinion in formulating their decisions, to fulfil their Localism remit. Please refer to our response to the VAP Delivery Policies of October 2013 that remain pertinent for VALP.

Question 4 – No.

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Agent Organisation  Agent Name  Agent Alias

Uniform Ref   Keep\_informed  Duty to Co-operate Body

Customer Alias  Customer Name  Organisation

Customer\_Class

## Summary of Comments

Question 1 – No comments.

Question 2 – No comments.

Question 3 - In response to Question 3, this Consultation Response seeks to highlight the potential for the land to the south of Aylesbury to be included in the emerging Plan as a housing allocation. The Consultation Response contains the following information: • Site and Surrounding Area – a description of the site and context of the surrounding area; • The Proposal – details of the proposed allocation; • Planning Policy – an assessment of the planning policy position in relation to the site; and • Conclusion

Question 4 – Aylesbury Vale District Council is required to identify sites for residential development in the new development plan period. It is proposed that the land south of Aylesbury should be allocated for residential development to help meet the District's updated objectively assessed housing need. This point is particularly pertinent in light of the District's likely need to accommodate the housing need of neighbouring districts in the forthcoming plan period. The site is located in an inherently sustainable location, in close proximity to the service provision within Aylesbury, public transport connections and employment opportunities. It is therefore concluded that land south of Aylesbury represents an excellent opportunity for sustainable residential development which will assist the Council in addressing their market and affordable housing needs early on in the Plan period. Therefore it is proposed that the site should be allocated for residential development in the emerging Local Plan.

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Agent Organisation  Agent Name  Agent Alias

Uniform Ref   Keep\_informed  Duty to Co-operate Body

Customer Alias  Customer Name  Organisation

Customer\_Class

## Summary of Comments

Question 1 – Thank you for consulting Central Bedfordshire on the above. We have no comments to make at this stage.  
Question 2 – No comments.  
Question 3 - No comments.  
Question 4 – No comments.

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Agent Organisation  Agent Name  Agent Alias

Uniform Ref   Keep\_informed  Duty to Co-operate Body

Customer Alias  Customer Name  Organisation

Customer\_Class

## Summary of Comments

Question 1 – No comments.  
Question 2 – No comments.  
Question 3 - It's not clear how the new VALP will deal with the issues raised by the Localism Act and in particular the relationship between VALP and Neighbourhood Plans.  
Question 4 – No comments.

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Agent Organisation  Agent Name  Agent Alias

Uniform Ref   Keep\_informed  Duty to Co-operate Body

Customer Alias  Customer Name  Organisation

Customer\_Class

## Summary of Comments

Question 1 – Yes.  
Question 2 – There is no reference in the scope to biodiversity, green infrastructure or landscape issues. The Joint Planning Unit would expect these matters to be addressed in accordance with the NPPF. For example, para 114 of the NPPF expects Local Plans to set out a strategic approach for the creation and protection of networks of biodiversity and green infrastructure. This should include the consideration of cross boundary issues as recognised in NPPF para 117. The West Northamptonshire Joint Core Strategy identifies a series of sub-regional and local green infrastructure corridors a number of which extend into Aylesbury Vale. (see Figure 6 attached).  
Question 3 – See Question 2.  
Question 4 – We welcome the opportunity to continue to work closely with the Council to address the key issues with potential cross boundary implications including: • Objectively assessed housing needs and the associated requirements for jobs, • Proposals for the expansion of Silverstone Circuit, and • The implications of growth at Towcester and Brackley and appropriate mitigation measures such as improvements to the A43 and the management of flood risk.

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Agent Organisation  Agent Name  Agent Alias

Uniform Ref   Keep\_informed  Duty to Co-operate Body

Customer Alias  Customer Name  Organisation

Oxfordshire  
Wildlife Trust

Customer\_Class

## Summary of Comments

Question 1 – Welcome the inclusion of biodiversity within the ‘Protection of environmental and heritage assets’ section.

Question 2 – No comments.

Question 3 - Biodiversity is subject to both statutory and policy protection. Answer to this question provided clarification on the legislation or policy which is relevant to comments. Core planning principles - The enhancement of biodiversity through planning decisions is therefore enshrined within the core principles of the National Planning Policy Framework (Paras 6, 7 & 9). VALP planning policies should therefore have as a key aim, to ensure that planning decisions lead to a net gain for nature, not simply ensuring no net loss. Statutory Biodiversity Duty – AVDC have a statutory duty towards the conservation of biodiversity. VALP planning policies should therefore demonstrate that AVDC is actively implementing this Biodiversity Duty by; for example, supporting the Local Records Centre; uses up to date information that the Records Centre provides; Ensures planning decisions are informed by adequate sound professional ecological advice. The Mitigation Hierarchy - Determination of planning decisions should make a clear distinction between avoidance, mitigation and compensation measures ensuring that decisions are supported by an appropriate biodiversity evidence base (NPPF para 118). VAP planning policy should ensure that this hierarchy is appropriately implemented within all decisions. Information requirements - VAP planning policies should therefore ensure that all necessary protected species surveys are undertaken, submitted and appropriately evaluated before planning permission is granted and not included as a condition appended to the planning permission once granted. Where it is likely that a proposal will impact upon any of these features, up to date information on the nature of the biodiversity features and extent of likely impact should be provided with the planning application. VAP planning policies should ensure that planning applications are accompanied by appropriately extensive, up to date and reputable biodiversity information. VAP policies should therefore encourage an early dialogue with applicants to ensure that the need and scope of appropriate biodiversity information is required at the pre-application stage wherever possible. Internationally designated sites - Planning applications should be accompanied by an appropriate level of biodiversity information evaluating any likely adverse impacts and avoiding, mitigating or compensating for these impacts in line with the mitigation hierarchy outlined above. VAP planning policies must comply with the requirements of The Conservation of Habitats and Species Regulations (as amended). Nationally designated sites - Planning applications should be accompanied by an appropriate level of biodiversity information evaluating any likely adverse impacts and avoiding, mitigating or compensating for these impacts in line with the mitigation hierarchy outlined above. VAP planning policies must comply with the

# Vale of Aylesbury Local Plan

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requirements of the Wildlife and Countryside Act 1981 (as amended). Locally designated sites - VAP planning policies should therefore ensure a presumption against permitting planning applications on Locally designated sites. Ancient woodland - VAP planning policies should therefore state the refusal of permission for all planning applications resulting in loss or deterioration of these irreplaceable habitats and trees. Legally protected species - VAP planning policies should ensure that planning applications are accompanied by appropriately extensive, up to date and reputable species biodiversity information. Other Protected Species and Protected Habitats - VAP planning policies must therefore set a framework for the clear recording and reporting on the condition of priority species and habitats, with quantified measures to ensure recovery. Coherent ecological networks - VAP planning policies should therefore encourage, as best practice, communication with and consultation of the Buckinghamshire Local Nature Partnership in order to identify and promote coherent ecological networks across Aylesbury Vale. VAP planning policies should therefore set a framework for the clear recording and reporting on measures to be taken for the positive management of networks of biodiversity, with clearly quantifiable metrics, based on the BOA network. VAP planning policies should also ensure that appropriate communications are undertaken with the Local nature Partnership. network. Building in biodiversity - VAP planning policies should ensure that planning applications lead to a net gain for biodiversity by building biodiversity into the design of the development

Question 4 – No comments.

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<input type="checkbox"/> Agent	Organisation	<input type="text" value="Terence O'Rourke Ltd"/>	Agent Name	<input type="text" value="Terence O'Rourke Ltd"/>	Agent Alias	<input type="text" value="Willi Colbey"/>
Uniform Ref	<input type="text" value="05303"/>	<input checked="" type="checkbox"/> Keep_informed	<input type="checkbox"/> Duty to Co-operate Body			
Customer Alias	<input type="text" value="Ms Pippa Cheetham"/>	Customer Name	<input type="text" value="O&amp;H Properties Limited"/>	Organisation	<input type="text" value="Terence O'Rourke Ltd"/>	
Customer_Class	<input type="text" value="Developer Interest"/>					

## Summary of Comments

Question 1 – The broad range of topic areas listed are appropriate, but consider that item 1 (Spatial Strategy) needs to be expanded to make specific reference to the influence of key settlements in neighbouring authorities such as Milton Keynes. The currently proposed focus of the strategy on Aylesbury and Buckingham would potentially limit the scope to achieve development in other sustainable locations within the district. Item 3. Site Allocations, is an essential component of the plan, which must be included to ensure effective housing delivery. We consider that a fundamental component of meeting these tests (paragraphs 47 & 182 of the NPPF) is an ability to show how the identified housing need will be realistically met. Question 2 – As stated above, specific reference needs to be made to the influence of neighbouring authorities in terms appropriate locations for development, housing need and travel patterns. Paragraph 157 of the NPPF emphasizes the importance of working with neighbouring authorities to ensure the plan reflects any wider development needs.

Question 3 - See responses to questions 1 and 2.

Question 4 – See responses to questions 1 and 2.

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<input type="checkbox"/> Agent	Organisation	<input type="text"/>	Agent Name	<input type="text"/>	Agent Alias	<input type="text"/>
Uniform Ref	<input type="text" value="05673"/>	<input type="checkbox"/> Keep_informed	<input checked="" type="checkbox"/> Duty to Co-operate Body			
Customer Alias	<input type="text" value="Charles Routh"/>	Customer Name	<input type="text" value="Natural England"/>	Organisation	<input type="text"/>	
Customer_Class	<input type="text" value="Environmental Organisation"/>					

## Summary of Comments

Question 1 – We responded to the similar Regulation 18 consultation about development management policies for VAP, which included a number of detailed comments which we wish to be carried forward into this consultation.

Question 2 – No comments.

Question 3 - In addition, we advise that the plan should include a strategic approach to enhancing the natural environment as per NPPF para 114. We also note that there are a number of environmental assets in or liable to be affected by the plan, and these need to be considered in the plan making process. These include the Chilterns AONB, European Sites, Sites of Special Scientific Interest, and more local features of wildlife value.

Question 4 – No comments.

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June 2014



Agent Organisation  Agent Name  Agent Alias

Uniform Ref   Keep\_informed  Duty to Co-operate Body

Customer Alias  Customer Name  Organisation

Customer\_Class

## Summary of Comments

Question 1 – No comments.

Question 2 – No comments.

Question 3 – Policy RA should be revised to take into account very small (i.e one house – developments), should be more lenient when we are looking at one house developments, particularly where the local community are in favour, and where developments are on the edge of the village, they do not extend the built up area on the opposite side of the road. Houses on the edge of villages are allowed to extend into their gardens, or build new developments in their garden, but an application for a house on the opposite side of the road, that is further into the village and less into the countryside is rejected because it is not bordered on three sides. I do think we should retain RA14 for developments over one house, and that extend the village boundary.

Question 4 – No comments.

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<input type="checkbox"/> Agent	Organisation	<input type="text"/>	Agent Name	<input type="text"/>	Agent Alias	<input type="text"/>
Uniform Ref	<input type="text" value="06036"/>	<input checked="" type="checkbox"/> Keep_informed	<input type="checkbox"/> Duty to Co-operate Body			
Customer Alias	<input type="text" value="Mr Neil Cottrell"/>	Customer Name	<input type="text" value="Banner Homes"/>	Organisation	<input type="text"/>	
Customer_Class	<input type="text" value="Developer Interest"/>					

## Summary of Comments

Question 1 – Yes. However, it is vital that all work streams, including residential development are underpinned by effective cross boundary workings with other LPAs. In particular, the LPA must assemble a robust evidence base to ensure that the Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area (paragraph 47 of NPPF refers). This work must also encompass matters such as mix or affordability.

Question 2 – No comments.

Question 3 - No comments.

Question 4 – Given the existing policy vacuum , we would respectfully request that the LPA responds positively to schemes which deliver housing, particularly in and around sustainable rural settlements.

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Agent Organisation  Agent Name  Agent Alias

Uniform Ref   Keep\_informed  Duty to Co-operate Body

Customer Alias  Customer Name  Organisation

Customer\_Class

## Summary of Comments

Question 1 – Yes.  
Question 2 – Development management policies should include criteria for assessing retail proposals – both within and outside town centres; ensuring assessed retail needs are provided for in full. Policies should also cover heritage matters.  
Question 3 – None.  
Question 4 – None.

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<input checked="" type="checkbox"/> Agent	Organisation	<input type="text" value="Chilmark Consulting"/>	Agent Name	<input type="text" value="Chilmark Consulting"/>	Agent Alias	<input type="text" value="Mr Mike Taylor"/>
Uniform Ref	<input type="text" value="06063"/>	<input checked="" type="checkbox"/> Keep_informed	<input type="checkbox"/> Duty to Co-operate Body			
Customer Alias	<input type="text" value="Jonathon Dawes"/>	Customer Name	<input type="text" value="Barwood Land And Estates Limited"/>	Organisation	<input type="text" value="Chilmark Consulting"/>	
Customer_Class	<input type="text" value="Developer Interest"/>					

## Summary of Comments

Question 1 – The VALP consultation document offers very little by way of detail on the content that AVDC proposes to include and pursue. Nothing included in the consultation that allows insight into the Plan's actual draft vision, strategic objectives, policy issues/options or indeed alternative choices. The list of policy topic areas appears appropriate but it will be the extent, coverage, approach and scope of each policy as it emerges that will be of concern to our client. This lack of detail contained in the VALP consultation document therefore limits the extent of consideration, review and comments that our client, Barwood Land and Estates Ltd (Barwood Land) can offer at this point on the VALP. Barwood Land therefore reserves the right to make further, detailed representations in due course.

Question 2 – The list of policy topic areas does not appear to be missing policy theme, but as set out above in response to Question 1, it will be the extent, coverage, approach and scope of each policy as it emerges that will be of concern to our client.

Question 3 – Barwood Land are concerned that the VALP does not repeat the past, systematic failures in plan making for Aylesbury Vale as the withdrawn former Core Strategy and former VAP both demonstrated. It is imperative that the VALP makes provision for the full, objectively assessed housing needs and economic growth objectives of the District. In so doing, AVDC must effectively identify, analyse, test and evaluate the housing supply and demand issues arising across the Housing Market Area and plan in a positive manner to meet needs that is wholly consistent with the requirements of S33A of the Localism Act (concerning the Duty to Cooperate); the National Planning Policy Framework (paras 14,17,47-50,156-159 and 173) and the relevant parts of the National Planning Practice Guidance (including section 2a covering Housing and Economic Development Needs Assessments). New analysis should be undertaken and the evidence base updated accordingly. The Local Development Scheme that indicates the time period and key milestones for the preparation of VALP should be updated and amended to include additional time for evidence preparation and analysis before the publication of the VALP Issues and Options draft Local Plan. This is in order to allow an appropriate time period for the preparation of a comprehensive suite of supporting evidence for the VALP, working in conjunction with neighbouring authorities, that is capable of underpinning a sound, effective and achievable Local Plan for the District.

Question 4 – This is a very early stage in the VALP plan preparation process and given the lack of details now consulted upon, Barwood Land reserves the right to make further, detailed representations in due course. The absence of any comment now does not indicate any agreement to the potential policy topics or themes consulted upon.

# Vale of Aylesbury Local Plan Regulation 18 - Scoping Summary Report

June 2014



<input type="checkbox"/> Agent	Organisation	<input type="text" value="Barton Willmore"/>	Agent Name	<input type="text" value="Barton Willmore"/>	Agent Alias	<input type="text" value="Michael Knott"/>
Uniform Ref	<input type="text" value="06070"/>	<input type="checkbox"/> Keep_informed	<input type="checkbox"/> Duty to Co-operate Body			
Customer Alias	<input type="text" value="Sir/Madam"/>	Customer Name	<input type="text" value="Gallagher Estates"/>	Organisation	<input type="text" value="Barton Willmore"/>	
Customer_Class	<input type="text" value="Developer Interest"/>					

## Summary of Comments

Question 1 – The VAP Inspector in his letter to the Council advised that the Duty Cooperate has not been fulfilled and referenced potential unmet needs from other authorities and how they will be accommodated, in particular concerning the relationship of Aylesbury Vale to Milton Keynes and it's future growth (Para 27 Inspectors Report). In respect of housing provision the Inspector considered that significant strategic housing issues need to be effectively resolved as soon as possible through the plan making process following genuine cooperation and collaboration with other authorities and concluded that the Plan had not been positively prepared, justified or effective, not consistent with national policy and therefore not sound. (Para 41-42). The scope for accommodating Milton Keynes related growth within Aylesbury Vale District should be the subject of specific assessment and consideration by the Council. It should be informed by discussions with Milton Keynes Council. We understand that MKC has commissioned its own Strategic Housing Market Assessment (SHMA. Starting point should be constructive, active and positive cooperation between authorities to establish the scale of any unmet needs arising from the growth of Milton Keynes. Meeting the full objectively assessed needs of this Housing Market Area, including Milton Keynes will require such cross boundary growth into Aylesbury Vale District. This should be planned for as part of the VALP in terms of the following content: the Spatial Strategy and Vision for the District; the housing and jobs numbers over the Plan period; the inclusion of any site allocations associated with helping to meet the growth needs of Milton Keynes; and the consideration of infrastructure needs associated with growth. Essential that both authorities commence constructive and active cooperation as they progress new Local Plans for their area (or indeed consider the appropriateness of joint policies). In terms of potential site allocations, a separate submission has been made to the Council on behalf of Gallagher Estates with details of land at Eaton Leys. This includes an initial appraisal of the site and its suitability for new development. Land at Eaton Leys represents a sustainable location for new development and could deliver a new sustainable community crossing the administrative areas of Milton Keynes and Aylesbury Vale. It is the most appropriate location for growth and it capable of delivering a range of benefits, as explained further within the separate 'Call for Sites' submission.

Question 2 – No Comments.

Question 3 – No Comments.

Question 4 – This initial consultation on the Vale of Aylesbury Local Plan (VALP) provides little reassurance that past failures to adequately address the cross-boundary issues relating to growth of Milton Keynes will be dealt with through this new plan. This is a fundamental strategic planning matter for this area and failure to plan for the development needs of the wider area seriously risks a repeat of past unsuccessful attempts to put an up to date Local Plan in place.

# Vale of Aylesbury Local Plan Regulation 18 - Scoping Summary Report

June 2014



<input checked="" type="checkbox"/> Agent	Organisation	Marrons Planning	Agent Name	Marrons Planning	Agent Alias	Jane Gardner
Uniform Ref	06078	<input checked="" type="checkbox"/> Keep_informed	<input type="checkbox"/> Duty to Co-operate Body			
Customer Alias	Sir/Madam	Customer Name	Martin Grant Homes And Rey Construction	Organisation	Marrons Planning	
Customer_Class	Developer Interest					

## Summary of Comments

Question 1 – Policy topic areas specified are broadly appropriate for inclusion within the emerging Local Plan. Concerns relate to some of the phrases in the description of the topic areas. Policy Topic Area 3: site allocations ‘if required’ from the Examination into the VAP, it is clear that the objectively assessed need for homes and jobs within the District, plus whatever contribution is to be made towards meeting potential unmet needs from other authorities, will necessitate sites to be allocated for a range of uses, including housing, and it is misleading to imply that this may not be the case. The need for sites to be allocated is already being recognised by Parish Councils, such as Wing, as part of the preparation of their Neighbourhood Plans. The Local Plan should not only be providing for the development needs of the area but be encouraging growth and the benefits associated with it. ¶ Question 2 – Policy Topic Area 1: It is clearly essential for any plan to contain a spatial strategy and vision for “key settlements, including Aylesbury and Buckingham”. However, it is considered that the scope of this topic area is too tightly drawn with no regard to the findings of the Inspector(VAP) regarding the relationship between Aylesbury Vale and the growth of Milton Keynes. The need for joint working between the Councils of Aylesbury Vale and Milton Keynes was also clearly set out in the Inspector’s Report on the Milton Keynes Core Strategy (May 2013) and in Policy CS6 of the adopted Milton Keynes Core Strategy (July 2013). Milton Keynes publicly stated that the draft VAP did not adequately address the potential need for the growth of the urban area of Milton Keynes into Aylesbury Vale; the clear implication being that the Local Plan must address this key issue. A further consideration is to address the needs of the Rural Area and the principal settlements within it in the Spatial Strategy. By referring solely to Aylesbury and Buckingham (the largest settlements within the District), there is a danger that the strategy will not be sufficiently widely drawn. Suggested change to the spatial strategy and vision scope: “Spatial strategy and vision for key settlements including Milton Keynes (insofar as development associated with its growth will be accommodated within the District), Aylesbury, Buckingham and local centres within the Rural Areas”. The topic areas fail to acknowledge Aylesbury Vale’s hinterland function for Milton Keynes, which is unable to accommodate all the services and facilities which are required to meet the needs of its residents and those who work within the City; many of whom live within Aylesbury Vale. Currently, identified needs and aspirations include a park and ride facility and the Bletchley Southern Bypass. Other services and facilities are likely to be required during the plan period and the Local Plan must therefore be sufficiently flexible to accommodate these requirements. One example of the type of facility which may need to be accommodated is a railway station / halt on the east-west rail link to serve development to the south west of Milton Keynes.

Question 3 – Detailed representations submitted to the SHLAA in respect of sites at Wing and to the South West of Milton Keynes and would

# Vale of Aylesbury Local Plan

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ask that they are taken into account as part of the preparation of the Local Plan. In so doing, it is essential that the Plan not only takes full account of the need for growth in the area but also provides for the whole spectrum of development required to meet the needs, aspirations and demands of both the urban (including Milton Keynes) and rural areas, together with their associated infrastructure requirements.

Question 4 – Not at this stage, although anticipate that they will wish to comment further as the Plan evolves.

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# Vale of Aylesbury Local Plan Regulation 18 - Scoping Summary Report

June 2014



Agent Organisation  Agent Name  Agent Alias

Uniform Ref   Keep\_informed  Duty to Co-operate Body

Customer Alias  Customer Name  Organisation

Customer\_Class

## Summary of Comments

Question 1 – Yes – the coverage seems appropriate. It will however be important to ensure that the new plan properly addresses the question of the role that Aylesbury should play in the wider sub-region, particularly in term of meeting wider housing needs (see response to question 4 below).

Question 2 – No significant policy areas are missing from your list. Whilst we would usually suggest the need for a comprehensive Green Belt review in the light of comments from our own Core Strategy Inspector, this may not be necessary for Aylesbury bearing in mind the relatively small area of Green Belt within your area. Please also see response to question 4 below.

Question 3 – At this stage, it is too soon to say what the detailed strategy or policies should contain. Dacorum Borough Council's main concern is that the VALP should take full account of the Inspector's letter of 7 January 2014 on the Vale of Aylesbury Plan, in particular his conclusions concerning the duty to co-operate and the overall provision for housing and jobs. We welcomed your paper on 'Housing Market Links for Aylesbury Vale' (April 2014) and your proposed approach to the Strategic Housing Market Assessment (SHMA). In our comments of 25 April 2014 on this paper, we welcomed the opportunity to be part of your SHMA Steering Group. We would also wish to be involved in discussions on the jobs growth target. We will be offering a similar invitation to Aylesbury Vale to be involved in Dacorum's SHMA (and other relevant technical work) in due course.

Question 4 – No.

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Agent Organisation  Agent Name  Agent Alias

Uniform Ref   Keep\_informed  Duty to Co-operate Body

Customer Alias  Customer Name  Organisation

Customer\_Class

## Summary of Comments

Question 1 – Yes.  
Question 2 – No – we believe everything that should be included has been.  
Question 3 – Not at this time.  
Question 4 – No comments.

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Agent Organisation  Agent Name  Agent Alias

Uniform Ref   Keep\_informed  Duty to Co-operate Body

Customer Alias  Customer Name  Organisation

Customer\_Class

## Summary of Comments

Question 1 – The policy topic areas are appropriate. These topics need to be approached in a positive manner to not only ensure that the objectively assessed needs of the district are accommodated but also the unmet needs of neighbouring authorities are catered for. This approach must underpin the entire plan.

Question 2 – The plan should be developed in the context of Aylesbury Vale's interaction with neighbouring authorities. The strategic role that Aylesbury plays for the wider region should be specifically referred to in the VALP.

Question 3 – The VALP should be positively prepared in accordance with the guidance in the NPPF and policies should provide clear guidance as to the level and location of future growth for the area. There should be a clear policy outlining how the development on land to the South of Oxford Road, Aylesbury would help secure the sustainability aspirations of the Council.

Question 4 – There should be a statement as to how the concerns raised by the Planning Inspector will be addressed in the evolution of this current plan. Early engagement with neighbouring authorities and an up to date SHMA are fundamentally important to establishing any strategic framework for the district and surrounding region. The Council need to objectively assess development opportunities available now to address the poor delivery of housing in recent years and how the future provision of development can be secured.

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<input checked="" type="checkbox"/> Agent	Organisation	<input type="text" value="Savills"/>	Agent Name	<input type="text" value="Mr Robert Linnell"/>	Agent Alias	<input type="text" value="Mr R Linnell"/>
Uniform Ref	<input type="text" value="06139"/>	<input checked="" type="checkbox"/> Keep_informed	<input type="checkbox"/> Duty to Co-operate Body			
Customer Alias	<input type="text" value="Sir/Madam"/>	Customer Name	<input type="text" value="Land Improvement Holdings"/>	Organisation	<input type="text" value="Savills"/>	
Customer_Class	<input type="text" value="Developer Interest"/>					

## Summary of Comments

Question 1 – Yes – the topic areas as proposed are appropriate.

Question 2 –

- Under the Spatial Strategy and Vision, a hierarchy of settlements dependant on their level of sustainability should be included, as set out in the previous VAP. This will meet the criteria in the NPPF for development to be directed towards the more sustainable settlements.
- In terms of site allocations, this section should have regard to Neighbourhood Plans and/or the views of local communities. However, it is important to define a housing figure for the higher order settlements to enable the Neighbourhood Plans to respond accordingly.
- A section on “Implementation and Contingency” is essential to demonstrate what action the Council will take if development is not coming forward at the rates set out in the plan or housing and employment numbers vary (ie through an updated SHMA etc).

Question 3 – The spatial strategy for the District and identification of key settlements to deliver growth in accordance with the principles of the NPPF. The NPPF is clear in identifying a presumption in favour of sustainable development which should be seen as a golden thread running through both plan-making and decision-taking. The spatial strategy should therefore seek to deliver sustainable development. In order to do so, the spatial strategy should concentrate growth at the strategic settlements in the District e.g. Aylesbury and Buckingham, as well as the settlements of Haddenham, Winslow and Wendover. The level of growth proposed for each settlement should be proportionate to land that is available (as identified in the SHLAA) and achievable service and facility provision. The NPPF also identifies that local planning authorities are required to significantly boost the supply of housing by using their evidence base to ensure their Local Plans meet the full, objectively assessed needs for housing in the Strategic Housing Market Area. The distribution of growth throughout the District should be considered in light of the fully assessed housing need, in order to ensure appropriate growth provision, and consider delivery of housing that may be required in order to assist neighbouring local planning authorities whom are unable to meet their full housing requirements (eg Luton and Bedford as well as any overspill from London). The VAP made a significant reliance on unidentified sites in the rural areas of the District. This resulted in a highly unsustainable strategy and one that raised issues regarding deliverability. A more robust strategy must be adopted in the VALP to provide more certainty of delivery over the plan period. This should include a greater reliance on strategic sites within the main sustainable locations within the District, ie Aylesbury, Buckingham, Haddenham, Winslow and Wendover.

Question 4 – The Plan must be backed up by a detailed and robust evidence base including housing needs assessment and site assessment.

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<input type="checkbox"/> Agent	Organisation	<input type="text"/>	Agent Name	<input type="text"/>	Agent Alias	<input type="text"/>
Uniform Ref	<input type="text" value="06184"/>	<input checked="" type="checkbox"/> Keep_informed	<input type="checkbox"/> Duty to Co-operate Body			
Customer Alias	<input type="text" value="Mr J Wilkinson"/>	Customer Name	<input type="text" value="John Wilkinson"/>	Organisation	<input type="text"/>	
Customer_Class	<input type="text" value="Member of the Public"/>					

## Summary of Comments

Question 1 – Yes.

Question 2 – No, assuming that item 6, Infrastructure Delivery Plan, includes a major review of the existing public transport infrastructure and how that will be improved to reduce reliance on private cars.

Question 3 – When considering the level of housing and job numbers, the policies need to take into account the existing very high net out-commuting from the District for employment. The current level of out-commuting relies to a great extent on the use of private cars which is both undesirable and environmentally unsustainable. The Inspector for the VAP Examination took the view that more housing would be required to support the planned level of jobs growth, because there was no substantive evidence that the patterns of out-commuting or job density are likely to change. In other words, more housing would be required to support the level of employment growth anticipated.

Reducing the number of new jobs to create the sort of balance that the Inspector believes to be appropriate is clearly not the answer, as that would restrict economic growth. The Plan therefore needs to find a way of creating employment growth that not only sustains the planned housing growth but also reduces the current need for out-commuting for employment. Simply increasing the housing numbers would just increase the amount of out-commuting.

The housing and job strategies therefore need to be interlinked. The policies need to identify how job densities in the principal employment centres will be improved and how that will be linked to new housing in a manner that will reduce the extent of commuting by private car. This will almost certainly involve fundamental improvements to the public transport infrastructure.

Question 4 – The VAP proposed too great a proportion of new homes in the rural areas remote from Aylesbury, which is the principal centre of employment, retail, education, healthcare, cultural, recreation and other community services within the District. This would have resulted in additional travel from the rural areas to access those services, much of which would inevitably be by private car. Furthermore, the VAP did not address the spatial distribution imbalance that occurred over the period of the previous development plan, AVDLP, when the proportion of new homes delivered in Aylesbury compared with the rural areas was much lower than planned. This spatial imbalance needs to be addressed in the VALP.

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<input checked="" type="checkbox"/> Agent	Organisation	<input type="text"/>	Agent Name	<input type="text"/>	Agent Alias	<input type="text"/>
Uniform Ref	<input type="text" value="06221"/>	<input checked="" type="checkbox"/> Keep_informed	<input type="checkbox"/> Duty to Co-operate Body			
Customer Alias	<input type="text" value="Mr Adrian Cattell"/>	Customer Name	<input type="text" value="Paul Newman Homes"/>	Organisation	<input type="text"/>	
Customer_Class	<input type="text" value="Developer Interest"/>					

## Summary of Comments

Question 1 – The topic areas proposed to be covered are appropriate, but the matters indicated are too 'broad brush' in the manner in which they are set out. AVDC should have provided more detail relating to the intended break down of the topic areas in order to demonstrate that the matters would be covered in a manner that would satisfy NPPF paragraph 182. PNNH have particular concerns relating to the following identified 'content': the spatial strategy and vision for the District; Housing and jobs numbers, Site allocations, Development Management Policies, Infrastructure Delivery Plan (CIL). In that from the detail provided by the Council at this Scoping Stage it is not possible to determine if the various issues will be dealt with in a manner that is positively prepared, justified, effective and consistent with national policy. It is imperative (having had two abortive development plan examinations to date) that AVDC demonstrate a willingness to comply with the NPPF and the Duty to Cooperate.

Question 2 – There are a number of issues that should be specifically addressed in the content and scope of the AVDC VALP, which should have been listed in the scoping note put out for consultation. These include a specific section on: • The NPPF policy background and how the VALP will be fully compliant with Paragraphs 14, 159, 47, 21 & 182. • How the Council has positively prepared and effectively complied with the Duty to Cooperate and identification of the full extent of housing need - together with how this is being addressed in allocations and development control policy. • Acknowledging the context of Milton Keynes and Leighton Linlade as significant growth areas immediately abutting the AVDC District boundary and which gives them specific status within the spatial vision and settlement hierarchy with policies for promotion of sustainable development to meet the housing needs of the SHMA. • Site allocations is an essential element of any AVDC VALP and is most definitely REQUIRED. A section on securing high standards of housing design.

Question 3 – Given that this consultation is at the very early stage of production of the AVDC VALP, PNNH feel that it is more appropriate to comment on the detailed nature of what individual policies should contain at the next stage of consultation on the Draft Plan proposals. At that time, PNNH will be able to consider the detailed approach that the Council is taking to the positive development of an appropriate policy base to effectively deliver the Plan strategy and will make full representations accordingly. Notwithstanding this, our response at sections 1&2 (above) highlights our key concerns and sets out the matters which should be positively addressed in producing a Plan strategy that would be compliant with the NPPF requirements. Site specific allocations policies - this section of the Plan should positively and effectively address how AVDC will guarantee to deliver the required levels of housing provision within the Plan period (with full methodology for ongoing performance review and contingency provisions in the event of sites not coming forward as anticipated).

The policies relating to - spatial vision and housing numbers; site allocations and infrastructure delivery - need to be coherently addressed

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comprehensively to ensure effective delivery. This should be addressed in a specific policy section on securing effective delivery. Policies relating to securing a high quality housing design which is sustainable should include reference to 'garden suburb development principles' on urban edge developments. High quality design should be central to sustainable development policies, having specific regard to the potential to engender a strong sense of local community through the creation of vibrant places in which to live, work and enjoy recreation. The Development Management Policies in the VALP should be positively prepared to further the NPPF objectives expressed at paragraphs 14 and 47. They should be centred on seeking solutions to facilitate sustainable development and promote economic growth, rather than framed as defensive, restrictive policies aimed at curtailing growth activity.

Question 4 – PNNH believe that the AVDC VALP should clearly set out a position statement that demonstrates an unqualified willingness on the part of the Council to fully embrace the NPPF presumption in favour of sustainable development. The document should also clearly set out a policy statement that demonstrates an unqualified willingness to full embrace the Duty to Cooperate in a constructive and positive manner that seeks to adopt a methodology to establish the full extent of the cross-border component of housing need and identifies a mechanism for housing delivery that seeks to provide for the full extent of this need.

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<input checked="" type="checkbox"/> Agent	Organisation	<input type="text" value="Quod"/>	Agent Name	<input type="text" value="Quod"/>	Agent Alias	<input type="text" value="Sophia Waugh"/>
Uniform Ref	<input type="text" value="06279"/>	<input checked="" type="checkbox"/> Keep_informed	<input type="checkbox"/> Duty to Co-operate Body			
Customer Alias	<input type="text"/>	Customer Name	<input type="text" value="Scotia Gas Networks"/>	Organisation	<input type="text" value="Quod"/>	
Customer_Class	<input type="text" value="Developer Interest"/>					

## Summary of Comments

Question 1 – We consider the topic areas to be appropriate for inclusion within the VALP.

Question 2 – Whilst only at an early stage, the new VALP needs to fully consider the key aspects considered pertinent to the redevelopment of hazardous installations and proactively address the requirements of Paragraphs 22 & 173 of the adopted NPPF. Paragraph 22 of the NPPF seeks to avoid an unhealthy “role-over” of employment land allocations and recognises the clear need for viable developments to come forward to avoid stymieing brownfield development sites.

There are substantial costs related to the decommissioning of gasholders, dismantling the associated infrastructure and decontamination of the sites which in turn require value from future land uses to fund this process. This should be recognised. The redevelopment of the former gas holder site to the west of Aylesbury town centre for alternative uses would support wider regeneration benefits as it will remove the limitations introduced by the HSE PADHI land use zoning and would offer the opportunity to provide much needed housing in the District.

Question 3 – We propose that the Aylesbury Vale include the following policy within the VALP, specifically to recognise paragraph 173 of the NPPF, as proposed below:- ‘Hazardous installations will be identified in the in the adopted Proposal Map. The Council will take into account the need to incentivise and fund decommissioning as part of any redevelopment proposal through higher value land uses.’ The placing of the above policy into the new VALP will ensure that the site is not stymied from future development potential and will provide more certainty that uses of value can be developed to fund the costs associated with any remediation works at this gasholder site in particular.

Question 4 – In line with the above wording, we propose that the former gas holder site bounded by Gatehouse Road (A41) and Oxford Road (A418) be included in Section 3 (Site Allocations) of the VALP for residential, retail or a combination of both. This will provide more certainty that sufficient value can be created to fund the costs associated with any remediation works at this site. Traditional employment uses would not be deliverable at this site as these could not generate value to offset remediation costs. Additionally, the immediate area is subject to change and in recent years has been party to various planning applications on former industrial land for residential development. The site is bounded to the south-east by a new housing development ‘The Serpentine’ for approximately 98 residential units and by the former Bearbrook Place to the south-west for 75 dwellings.

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<input type="checkbox"/> Agent	Organisation	<input type="text"/>	Agent Name	<input type="text"/>	Agent Alias	<input type="text"/>
Uniform Ref	<input type="text" value="06318"/>	<input checked="" type="checkbox"/> Keep_informed	<input checked="" type="checkbox"/> Duty to Co-operate Body			
Customer Alias	<input type="text" value="Kevin Owen"/>	Customer Name	<input type="text" value="Luton Borough Council"/>	Organisation	<input type="text"/>	
Customer_Class	<input type="text" value="Other Local Authority"/>					

## Summary of Comments

Question 1 – In respect of the content and scope of the VALP, we consider that it is very important for the reasons explained that the plan takes full account of Luton's unmet housing needs (including affordable housing needs) and economic growth in the preparation of AVDC's OHN and spatial strategy for development in the District including the review of its Green Belt boundary.

Question 2 – No comments.

Question 3 – No comments.

Question 4 – Luton Borough Council (LBC) has been working together with AVDC and our other neighbouring authorities under the Duty to Cooperate on a host of evidence base and strategy matters in the preparation of the Luton Local Plan. There are a number of strategic cross-boundary issues that have been identified between AVDC and LBC including housing, employment, infrastructure and Green Belt. We will continue to work closely with AVDC where these cross boundary issues have been identified. The determination of objectively assessed housing needs (OHN) for Luton and the wider Luton Housing Market Area which includes AVDC is of particular importance given the scale of population and economic growth in Luton projected over the next twenty years as evidenced by ONS population estimates and CLG Interim Headship Rates published in early 2013. Based on these ONS and CLG figures the trend migration forecast would be between 12,500 and 28,100 dwellings over the period 2011-2031. Given the scale of increase in housing indicated when using the latest ONS and CLG figures, Luton BC and Central Bedfordshire Council initiated a joint Luton and Central Bedfordshire SHMA refresh in June 2013 to fully understand and take account of this latest data. Seven local authorities (in addition to LBC and CBC ) were invited to sit on the SHMA Steering Group. In addition to Luton BC and Central Bedfordshire Council, the Steering Group consists of: Aylesbury Vale DC, Milton Keynes Council, North Hertfordshire DC, Stevenage BC, Bedford BC, Dacorum BC, St Albans City and DC. It is a useful forum for Officers and Members to engage on technical matters that relate to the determination of OHN for Luton and Central Bedfordshire and the Luton Housing Market Area.

As AVDC will be aware, the initial results from the joint SHMA refresh have emerged following a Duty to Cooperate member workshop which met on the 21st May which approved the initial findings for Luton and Central Bedfordshire's OHN. As a result, Luton's housing needs are more likely to be towards the lower end of the ONS/CLG range based on a combination of five year and ten year trend migration assumptions i.e. +18,000 households over 20 years. Luton's housing land capacity is being updated through its draft Strategic Housing Land Availability Assessment (SHLAA) which has been shared with AVDC for input and the emerging results are that the capacity of the Borough is approximately 6,000 dwellings leaving an unmet housing need of approximately 12,000 dwellings.

Given the scale of unmet housing need, the joint member workshop agreed a Memorandum of Understanding establishing a reference group

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chaired by Luton to work with its adjacent and neighbouring authorities to identify sustainable solutions to addressing this unmet need. As AVDC is located within the Luton Housing Market Areas, LBC will seek opportunities to meet its unmet housing needs in AVDC should it be necessary to do so through close joint working on the VALP and via the reference group. The reference group will sequentially explore potential ways of Luton's unmet housing need being accommodated with a view to these being incorporated into the local plans of the respective authorities. AVDC will be formally invited to this group and will have input into its terms of reference. In addition to substantial projected housing growth in Luton, it is important that the VALP recognises the important sub regional economic role of Luton and its wider Functional Economic Market Area (FEMA) in relation to AVDC. Luton is now commissioning work to set its ELR study within this context and will ensure that AVDC is invited to engage in the preparation of this evidence.

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<input checked="" type="checkbox"/> Agent	Organisation	<input type="text" value="Januarys"/>	Agent Name	<input type="text" value="Januarys"/>	Agent Alias	<input type="text" value="Mr Brian Flynn"/>
Uniform Ref	<input type="text" value="06305"/>	<input checked="" type="checkbox"/> Keep_informed	<input type="checkbox"/> Duty to Co-operate Body			
Customer Alias	<input type="text"/>	Customer Name	<input type="text" value="South West Milton Keynes Consortium"/>	Organisation	<input type="text" value="Januarys"/>	
Customer_Class	<input type="text" value="Developer Interest"/>					

## Summary of Comments

Question 1 – Yes, the proposed list of policy topic areas is appropriate. However, we request that the policy topic areas consider the full range of relevant matters, and have suggested amendments in Question 2 below to ensure that this occurs at the initial options generation stage of the process.

Question 2 – We acknowledge that the Spatial Strategy would include the key settlements of Aylesbury and Buckingham. However, the potential options for the Spatial Strategy must be widened to also include other reasonable alternatives or alternative strategic growth locations. Land adjacent to settlements located outside but adjacent to AVDC must also be considered at the options generation stage e.g. SWMK. The development and assessment of alternatives is a legal requirement under the SEA Directive and SEA Regulations. We request that the conclusions of the Inspector appointed to examine Draft VAP are used to inform the emerging VALP. The Inspector's letter (dated 7th January 2014) identified the failures of Draft VAP that will need to be addressed in a future development plan document, including strategic growth, levels of housing and employment growth, and the growth of Milton Keynes. The key paragraphs are as follows: Paragraphs 9, 21, 27, 33 & 37.

Question 3 – We request that the strategy should seek to address the following:

- 1) To identify sustainable development as an over-arching policy;
- 2) To meet the full objectively assessed need for housing and affordable housing in the Housing Market Area, and unmet needs from neighbouring areas: At the Draft VAP Examination Hearing Sessions the Council confirmed that there are no fundamental environmental or infrastructure constraints to higher levels of growth within the overall range identified (between 12,000 to 21,000 additional houses between 2011 and 2031) – see Paragraph 33 of the Inspector's letter;
- 3) To identify a separate transport accessibility policy. The SWMK Area would deliver additional housing and affordable housing, it is located close to Milton Keynes which is where employment opportunities exist and it would provide additional employment development. It is capable of contributing towards East-West rail. It could include a comprehensive package of sustainable transport measures to encourage walking, cycling and public transport, and provide green infrastructure.
- 4) To identify SWMK as a strategic growth location. The planning background to the SWMK Area provides the context. The identification of an urban extension in the SWMK Area emerged from a series of studies over the last twenty years. The former SWMK SDA Area successfully passed through the sustainability appraisal process of the South East Plan, and was specifically identified as a suitable location for

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development on the edge of Milton Keynes. Diagram MKAV1 (in SEP), specifically identified a Strategic Development Area at SWMK – the SWMK SDA Area. AVDC intended to carry the South East Plan strategy forward; it published a Vale of Aylesbury Proposed Submission Core Strategy and a Consultation Draft Salden Chase Masterplan & Delivery SPD which contained draft policies that specifically allocated land at the SWMK SDA Area. SWMK also successfully passed through the preliminary sustainability appraisal processes for the draft Core Strategy and draft NE Aylesbury Vale SDA SPD.

Question 4 – No.

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Agent Organisation  Agent Name  Agent Alias

Uniform Ref   Keep\_informed  Duty to Co-operate Body

Customer Alias  Customer Name  Organisation

Customer\_Class

## Summary of Comments

Question 1 – Thank you for your letter of 2 April concerning the scoping for the new Vale of Aylesbury Local Plan. I am happy that the matters which you list form a reasonable starting point for the scoping of the plan. It may be that other matters are identified as you move on to the issues and options stage and we would welcome the opportunity for further engagement at that time.

Question 2 – No comments.

Question 3 – No comments.

Question 4 – No comments.

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Agent Organisation  Agent Name  Agent Alias

Uniform Ref   Keep\_informed  Duty to Co-operate Body

Customer Alias  Customer Name  Organisation

Customer\_Class

Summary of Comments

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<input type="checkbox"/> Agent	Organisation	<input type="text"/>	Agent Name	<input type="text"/>	Agent Alias	<input type="text"/>
Uniform Ref	<input type="text" value="06357"/>	<input type="checkbox"/> Keep_informed	<input type="checkbox"/> Duty to Co-operate Body			
Customer Alias	<input type="text" value="Ginny Hall"/>	Customer Name	<input type="text" value="Mono Consultants Limited"/>	Organisation	<input type="text"/>	
Customer_Class	<input type="text" value="Utilities Provider"/>					

## Summary of Comments

Question 1 – We consider it important that there is a specific telecommunications policy within the emerging Local Plan. It is recognised that telecommunications play a vital role in both the economic and social fabric of communities (as referenced in Section 5 and paragraphs 42 & 43 of NPPF). The formulation of policy does not exist in isolation and there are numerous documents which will affect the formulation of any telecommunications policy, the most important of these being NPPF. On this basis we would suggest that a concise and flexible telecommunications policy should be included within the emerging Local Plan. Such a policy should give all stakeholders a clear indication of the issues that telecommunications development will be assessed against.

Question 2 – No comments.

Question 3 – We would suggest a policy which reads: “Proposals for telecommunications development will be permitted provided that the following criteria are met: - (i) the siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area; (ii) if on a building, apparatus and associated structures should be sited and designed in order to seek to minimise impact to the external appearance of the host building; (iii) if proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the (local) planning authority. (iv) If proposing development in a sensitive area, the development should not have an unacceptable effect on areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest. When considering applications for telecommunications development, the (local) planning authority will have regard to the operational requirements of telecommunications networks and the technical limitations of the technology.”

We would consider it appropriate to introduce the policy and we would suggest the following; “Mobile communications are now considered an integral part of the success of most business operations and individual lifestyles. With the growth of services such as mobile internet access, demand for new telecommunications infrastructure is continuing to grow. The authority is keen to facilitate this expansion whilst at the same time minimising any environmental impacts. It is our policy to reduce the proliferation of new masts by encouraging mast sharing and siting equipment on existing tall structures and buildings.”

Question 4 – No comments.

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<input type="checkbox"/> Agent	Organisation	<input type="text"/>	Agent Name	<input type="text"/>	Agent Alias	<input type="text"/>
Uniform Ref	<input type="text" value="06363"/>	<input type="checkbox"/> Keep_informed	<input checked="" type="checkbox"/> Duty to Co-operate Body			
Customer Alias	<input type="text"/>	Customer Name	<input type="text" value="Buckinghamshire&lt;br/&gt;County Council"/>	Organisation	<input type="text"/>	
Customer_Class	<input type="text" value="Adjoining Local Authority"/>					

## Summary of Comments

Question 1 – The policy topic areas appear to be appropriate for inclusion.

Question 2 – To aid clarity, topic area 5 could be split into separate areas as follows: 1) Sustainable development – to address climate change, sustainable drainage and flood risk management; 2) Protecting and enhancing the historic and natural environment – referencing archaeological and ecological matters; 3) Protecting and enhancing the historic and natural environment – referencing archaeological and ecological matters; 4) Delivering high quality places – to address urban and landscape design and accessibility (cycling, walking and passenger transport requirements); and 5) Green Infrastructure. As suggested previously, we encourage the District Council to consider Transport as a distinct policy area.

Question 3 – Flood Risk Management - Schedule 3 of the Flood and Water Management Act 2010 should be referenced as should the Bucks Local Flood Risk Strategy. Likely to be implemented in 2014, this Schedule will make Buckinghamshire County Council the SuDS Approval Body (SAB) for Buckinghamshire and ensure that sustainable drainage schemes are increased amongst new developments. Policy area 5 should also give criteria for the developments that require specific flood risk information, suggested policy wording.

Rights of Way - Paragraph 75 of the NPPF goes some way in providing protection and enhancement of rights of way, we would seek, though mention in local planning policy would strengthen the case. We would therefore wish to see the policy statements repeated from the previous Vale of Aylesbury Plan, namely paragraph 4.212 and Policy GP84: having regard for convenience, amenity and public enjoyment of a public right of way in considering applications for development. Smaller development can provide: a) improved surfaces; b) upgrading the status of routes from footpath to bridleway, encouraging greater use and enjoyment from cyclists and equestrians; and c) reducing the number of stiles and other structures that impede the less able (for example, the elderly, users with pushchairs, wheelchairs and mobility scooters). Larger applications also have the opportunity to provide sustainable transport routes in new housing developments to form attractive local walking and cycling opportunities, enabling greater links between town and country. Suggested policy wording.  Green Infrastructure - The County Council suggests the inclusion of a distinct section for Green Infrastructure. District policies and priorities as set out in the Buckinghamshire Green Infrastructure Strategy (April 2009) and the Buckinghamshire Green Infrastructure Delivery Plan (August 2013) should be referenced accordingly.  Landscape - Though not yet ratified by government, the inclusion of a contingency policy for HS2 is encouraged to consider the potential wide ranging construction impacts of the project. HS2 will be the most profound construction project to impact upon the Vale and will have repercussions for quality of life and the District economy.  There should also be a specific policy on the Bernwood Opportunity Zone (BOZ). The zone is looking at the economic opportunities presented by three major infrastructure projects in

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North Buckinghamshire: the Energy from Waste plant at Calvert (EfW), East West Rail (EWR) and, potentially, HS2. Collectively these projects will have an impact on the communities and environment of North Bucks with each project developing their specific mitigation strategies to manage this impact. BOZ focuses on revitalising the rural economy with opportunities for training/employment linked to agriculture, tourism and leisure, while at the same time ensuring that the special qualities of the natural and cultural environment are conserved and enhanced. The spatial strategy, housing and job numbers should have a joined up approach and address the aspirations for neighbouring authorities' local plans. The VALP needs to demonstrate how adjoining growth will fit in with its plans.

Question 4 – Thank you again for this opportunity to comment. We look forward to further opportunities to engage with the District Council through the preparation of the Vale of Aylesbury Local Plan.

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<input checked="" type="checkbox"/> Agent	Organisation	<input type="text" value="Bell Cornwell LLP"/>	Agent Name	<input type="text" value="Bell Cornwell LLP"/>	Agent Alias	<input type="text" value="Alexia Kemp"/>
Uniform Ref	<input type="text" value="06390"/>	<input checked="" type="checkbox"/> Keep_informed	<input type="checkbox"/> Duty to Co-operate Body			
Customer Alias	<input type="text"/>	Customer Name	<input type="text" value="Mr Walton"/>	Organisation	<input type="text" value="Bell Cornwell LLP"/>	
Customer_Class	<input type="text" value="Developer Interest"/>					

## Summary of Comments

Question 1 – We consider that the topic areas referenced are in the main appropriate for inclusion. Additional comments to make in relation to those listed, as outlined below. Inappropriate to consider Aylesbury and Buckingham in more detail. The new VALP should provide a spatial strategy and vision which addresses each of the District's settlements. With regards to the District's larger or more sustainable settlements, strategies and visions may need to be provided on a settlement by settlement basis to reflect varying characters or specific constraints. Meanwhile, for the smaller rural settlements, these could be grouped in accordance with an appropriate settlement hierarchy to address the specific needs of these settlements.

In response to point 2, we consider it absolutely critical that the new VALP sets housing and job numbers for the Local Plan period. Housing numbers must be based on up to date and robust evidence provided through a SHMA. The VALP must plan from the outset to deliver the full objectively assessed housing needs in accordance with the NPPF. The housing figures should provide an appropriate overview of the market, affordable and specialist housing requirements of the District. Where affordability or demand for affordable housing varies within the District, this should be outlined by the VALP.

Support the assumed plan period (to 2031) in line with NPPF (15 years post adoption), although would suggest that this date is immediately re-visited if delays in the plan-making process occurred over the coming months.

Question why it is uncertain whether site allocations would be required within the VALP and whether this is in response to all the topics listed or particular topics. It should be the role of the VALP to make site allocations, rather than these be left for a later plan document. This is supported by the NPPF (paragraph 153) and confirmed by the Planning Practice Guidance on Local Plans, Paragraph 012. It would not be appropriate for the VALP to wait to allocate sites through a separate document on the basis that the withdrawal of the Vale of Aylesbury Plan (VAP) has already significantly delayed the adoption of an up-to-date plan at AVDC. With high levels of housing and employment likely to be required, the VALP must make appropriate allocations and provide for all scales of sites across the District to give sufficient supply of allocated sites to deliver housing across the plan period. In relation to point 5, we support the inclusion of the development management policies listed although we do note a few policy areas to be missing. With regard to point 6 we support the reference within the consultation document to the infrastructure delivery plan and the expectation for the plan to provide a policy basis for the Community Infrastructure Levy (CIL). Note plans to align the preparations of CIL with the formal stages of the VALP, in order for a combined examination to take place. We consider this to be the most appropriate approach in light of the NPPF, which advises CIL rates to be worked up and tested alongside the Local Plan to ensure the deliverability of important infrastructure (in a timely manner) and to test the viability of proposed allocations.

Question 2 – Firstly, with regard to point 1 in respect of the VALP providing a spatial strategy and vision within the District, the plan needs to

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also be clear in respect of its 'strategic priorities' and make clear which of its policies address the strategic priorities of the District. This will ensure no scope for confusion or doubt in future Neighbourhood Planning processes and give important direction and meaning to the VALP. Need for a specific policy outlining the presumption in favour of sustainable development (reference paragraph 15 of the NPPF). The VALP should be clear that housing applications will be considered in the context of the presumption. In relation to development management policies there are a few policy areas which are missing from the list:

- No reference to the natural environment in general terms regarding landscape - should include a policy context for assessing proposals within the AONB (there is only reference to a green belt policy) (para 115 NPPF). Housing and employment are a significant threat to this designation which national policy advises should be highly protected.
- No reference to the historic environment in support of historic assets including archaeology.
- No reference is given to the protection and enhancement of conservation areas, which will be an important policy area to cover in respect of considering potential allocations.
- No reference to a biodiversity policy and the need for the planning system to contribute to.

Need addition to the list on monitoring and the process for reviews. The inclusion of a section relating to these matters within the VALP is essential for a number of reasons. The plan should outline how it will be monitored and how often, in order to understand the effectiveness of its policies and provide a mechanism for dealing with reviews of the plan before the 15 year period (reference NPPG on Local Plans, Paragraph 008).

Question 3 –

- With regard to the housing policies, strategies must be based upon need and policies should plan for meeting the full objectively assessed needs. Distribution of the overall housing need should be given, however whilst providing a distribution based strategy, the policy should also allow for flexibility.
- In respect of determining specific locations for housing, the VAP indicated five 'strategic' settlements (Aylesbury, Buckingham, Haddenham, Wendover and Winslow) these settlements were noted to significantly stand out from the rest (populations exceeded 3,600 residents). Significant development should be apportioned to each of these strategic settlements for a number of reasons and support the NPPF's presumption in favour of sustainable development.
- Development within and directly adjacent to these strategic settlements should also be supported. Bell Cornwell promote site to the north of Aylesbury Road and west of Halton Lane at Wendover (submitted in response to the 'Call for Sites').
- Consideration should also be given to sites which are outside of settlements. Such sites may still have a close relationship with the District's sustainable settlements, reduce reliance on the private car or the length of such journeys, and may in fact benefit from sustainable travel opportunities due to their location on the periphery of settlements. They may actually meet the intentions of the NPPF, better than some opportunities which exist directly adjacent to settlements ( e.g. Wendover is constrained). Strongly resist the application of an approach to review or develop within the AONB or Green Belt within the emerging VALP.
- Bell Cornwell promote site at Wendover Road adjacent to the Triangle Business Park at Quilters Way (also submitted in response to the 'Call for Sites') aa good example of an alternative site.
- Additional housing policies provided by the VALP need to be realistic in respect of the increasingly scarce availability of previously developed sites to deliver development. Likely need to rely upon greenfield sites and as stated above, we consider that development should be predominately directed towards the District's strategic settlements, followed by its larger villages. Consideration must also be made to areas which do not adjoin existing settlements but which fall within proximity to main settlements and have 'sub-urban' rather than 'rural' characteristics.
- We would also support the provision of a policy which specifically relates to housing developments outside of existing settlements. This is important in light of a continuing decline of brownfield sites and is therefore a current plan issue which must be dealt with by the VALP in order to provide a clear policy basis for the issue for the next 15 years. Such a policy should outline the Council's criteria which will be used to assess proposals outside of the existing built up areas of settlements.

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Question 4 – Regarding methods used in determining future allocations, or even a pool of ‘potentially suitable’ sites through a SHLAA.

Significant concerns regarding the importance placed within the previous SHLAA in terms of the perceived impact on ‘open countryside’ and the assertion that sites outside of ‘built up limits’ are therefore unsustainable. In light of a likely significant housing requirement, such a restrictive and dismissive approach will fail to outline sufficient potential sites for development.

In relation to the consideration of impact on ‘open countryside’, a detailed assessment must be made in each case with clear criteria used by the Council. The impact must take into account existing levels of vegetation (and ability to retain this through development), the ability for mitigation through appropriate boundary treatment, the potential for infill or rounding off development and the relationship of the site with other development in that location. The importance of varying areas of countryside should also be reflected in decision-making in relation to whether the ‘countryside’ location is within the AONB or Green Belt, which in NPPF terms indicate the importance of its protection.

Coalescence should only be an issue whereby this exists in respect of built development, i.e. not parish boundaries which have little bearing in planning terms.

Concerns relating to sites outside of strategic settlements being considered ‘unsustainable’. Details of the decision making criteria used for determining this matter should be published within the new SHLAA. Significant consideration must be given to the relationship of the site with nearby settlements, and their levels of connectivity in terms of existing footways, bus routes and proximity to railway stations. The location of facilities in proximity to the site and the position of the site in relation to the local or strategic road network are also important matters which should be considered.

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<input checked="" type="checkbox"/> Agent	Organisation	<input type="text" value="David Lock Associates"/>	Agent Name	<input type="text" value="David Lock Associates"/>	Agent Alias	<input type="text" value="Mr Nick Stafford"/>
Uniform Ref	<input type="text" value="06413"/>	<input checked="" type="checkbox"/> Keep_informed	<input type="checkbox"/> Duty to Co-operate Body			
Customer Alias	<input type="text"/>	Customer Name	<input type="text" value="September Properties"/>	Organisation	<input type="text" value="David Lock Associates"/>	
Customer_Class	<input type="text" value="Developer Interest"/>					

## Summary of Comments

Question 1 – September Properties support the range of policy topic areas identified by AVDC for inclusion within the VALP.

Question 2 – No.

Question 3 – September Properties are encouraged by AVDC's proactive work to prepare the VALP in response to the failure of the VAP and the uncertain planning policy context that this provides for Aylesbury Vale. September Properties urge AVDC to continue to plan in a proactive way by developing the VALP to respond to the requirements of the National Planning Policy Framework (NPPF) (para 159) to establish the full housing need within Aylesbury Vale. Suggest that in order to meet the requirements of the NPPF, and 'the duty to cooperate', the VAP should also consider the wider future housing requirements of neighbouring local authorities including Milton Keynes. These issues will be the key tests of soundness for the VALP and that AVDC's initial consideration of the scope of the VALP presents an opportunity to respond to these key tests from the outset of the plan making process. It is acknowledged that future growth will be directed towards 'Strategic Settlements' (as defined within the 'Settlement Hierarchy Assessment for the Vale of Aylesbury Plan Strategy' (September 2012)). However, a sustainable strategy would be to distribute modest growth to other smaller settlements within the district ie. 'Larger Villages' such as Stoke Hammond which have the necessary existing infrastructure and facilities and spatial connections with larger settlements so that they can support sustainable development. Encouraged that the VALP will include specific site allocations resulting from a thorough assessment of the sites identified through the 'call for sites' which accompanies this consultation and enable AVDC to consider sites which haven't previously been identified. Reference Paragraph 173 of the NPPF and that careful attention is paid to "viability and costs in plan-making and decision taking". Important that the VALP contains the necessary 'Development Management' policies which can support the delivery of the strategic elements of the plan, September Properties do urge caution that such policies must contain sufficient flexibility to ensure that policies relating to affordable housing, housing mix and infrastructure delivery do not threaten the viability of development proposals.

Question 4 – September Properties are committed to working with AVDC to assist the development of the VALP and will continue to respond to the other forthcoming consultations.

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<input checked="" type="checkbox"/> Agent	Organisation	<input type="text" value="Aitchison Raffety"/>	Agent Name	<input type="text" value="Aitchison Raffety"/>	Agent Alias	<input type="text" value="Neil Aitchison"/>
Uniform Ref	<input type="text" value="06418"/>	<input checked="" type="checkbox"/> Keep_informed	<input type="checkbox"/> Duty to Co-operate Body			
Customer Alias	<input type="text"/>	Customer Name	<input type="text" value="Buckinghamshire Advantage"/>	Organisation	<input type="text" value="Aitchison Raffety"/>	
Customer_Class	<input type="text" value="Local Delivery Vehicle"/>					

## Summary of Comments

Question 1 – The plan should follow the guidance of the National Planning Policy Framework however in addition in relation to Aylesbury, the Plan policies should give priority to development which improves the infrastructure and amenities of the town as well as improved employment opportunities.

Question 2 – Subject to review of the detail, the list appears comprehensive.

Question 3 – Please refer to the statement made in respect of 1 above. There are few new employment areas currently proposed in the County of Buckinghamshire apart from those within the new City of Milton Keynes. Because of environmental constraints in the Chilterns area, Aylesbury offers an alternative suitable area for expansion, both for housing and employment purposes. Since the last plan was prepared, Barratts have commenced a residential MDA to the north of the Grand Union Canal branch, whilst ARLA have completed a large milk processing plan to the east. The plan review should include re-zoning the land which lies to the north of the A41 encapsulated by these sites which will be the subject of a further representation under the “Call for site procedure”. The contention of Buckinghamshire Advantage is that the “Woodlands Site”, representing an area of around 425 acres or thereabouts, would be an appropriate location for a major development area of primarily employment led mixed use development with immediate access onto the dual-carriageway roundabout of the A41 and also College Road North. The development could also make provision for and contribute towards the completion of the Eastern Link Road. This accords with the Buckinghamshire County Council’s strategic plan of enhancing north-south connectivity and forms a key part of the BTVLEP Strategic Economic Plan (SEP) for Buckinghamshire. A strategy for Aylesbury Town Centre that ensures effective links to new major development areas.

Question 4 – Not at this stage.

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<input checked="" type="checkbox"/> Agent	Organisation	<input type="text" value="Framptons"/>	Agent Name	<input type="text" value="Framptons"/>	Agent Alias	<input type="text" value="Miss Louise Steele"/>
Uniform Ref	<input type="text" value="06481"/>	<input checked="" type="checkbox"/> Keep_informed	<input type="checkbox"/> Duty to Co-operate Body			
Customer Alias	<input type="text"/>	Customer Name	<input type="text" value="Catesby Estates Ltd"/>	Organisation	<input type="text" value="Framptons"/>	
Customer_Class	<input type="text" value="Developer Interest"/>					

## Summary of Comments

Question 1 – The reference to the spatial strategy and vision for the District and for key settlements should also include reference to larger villages, smaller villages and other settlements.

Question 2 – No comments.

Question 3 – No comments.

Question 4 – Highlight the case in the High Court of Gallagher Homes Ltd v Solihull MBC (copy attached), with regard to the proper assessment of full and objectively assessed need for housing and the relationship to the Duty to Cooperate. The extent to which the Vale of Aylesbury intend to follow the approach clearly explained in the High Court Judgement is not clear. In summary, there needs to be a distinction between the full objectively assessed needs figure and the 'policy on' housing requirement figure fixed by the Local Plan. (Reference Paragraph 37 & 97 of the judgement). As regards the duty to co-operate this needs to be undertaken in the context of Section 33A of the 2004 Act and paragraph 179 of the Framework. With reference to the High Court Judgement, in particular paragraphs 103 and 108, it is contended that the full objectively assessed needs for housing in the Housing Market Area has to be identified. Certainly, if and insofar as there is a shortfall, there need to be evidence of attempts to cooperate with adjacent authorities, as might be required by section 33A.

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<input checked="" type="checkbox"/> Agent	Organisation	<input type="text"/>	Agent Name	Optimis Consulting Ltd	Agent Alias	Miss Phillippa Martin-Mor
Uniform Ref	06489	<input checked="" type="checkbox"/> Keep_informed	<input type="checkbox"/> Duty to Co-operate Body			
Customer Alias	Andrew Screech	Customer Name	Peter Dean Estates	Organisation	<input type="text"/>	
Customer_Class	Developer Interest					

## Summary of Comments

Question 1 - • All the policy topics identified in the scoping consultation are considered appropriate for inclusion within the VAP. • The opportunity to create a single Local Plan is welcomed in this regard as a comprehensive approach. In-particular, adopting Site Allocations within the VALP is necessary to ensure suitable and available sites can be identified to meet development needs at the earliest opportunity; avoiding delays that may arise with preparing a second document at a later stage. However, policies that support effective windfall development will also be essential in ensuring delivery. • The reference to provision for detailed Development Management policies is also welcomed. It is important that this new Plan is prepared independently of old policies. • Consideration of a full range of land uses within the VALP is welcomed and recognises the requirement in the NPPF to provide for and drive sustainable economic development in the widest sense. • It is appropriate for the VALP to fully identify infrastructure requirements through the Infrastructure Delivery Plan.

Question 2 • Full consideration should be given to the settlement pattern and hierarchy across the District as a whole. • This is essential to establish a sustainable framework for development before limiting aspects of the Strategy to specific locations.

Question 3 • The Council is commended for running a “Call for Sites” phase at the earliest opportunity as part of the Scoping Consultation. This will provide a wide range of evidence on sites that are promoted and available for development and provide opportunities to deliver suitable and sustainable development across a range of uses. • It is essential that the VALP provides for a pattern of development across the District that is not subject to artificial development limits. This represented a major flaw within the withdrawn VAP, wherein supposed limits of development were applied to larger villages (50 units) and smaller villages (10 units). This is inappropriate when considering the time period for Strategic Plans and precludes application of the presumption in favour of sustainable development when assessing opportunities. • The Plan should support development that is community-led, community supported and/or contains clear community benefits. • Development which is able to support services such as shops, pubs, schools should be supported and encouraged. Likewise development which is able to contribute funds to re-provision or improvements to existing facilities should be supported. Community facilities should not be the preserve of larger service centres; all villages and communities should be able to benefit from development on an appropriate scale to boost their communities and support their facilities. • Unnecessarily restrictive policies on development in rural areas that fail to reflect the NPPF’s role for sustainable development risk a decline in services within villages. • In terms of making new provision within the VALP, including new Site Allocations, the existing content of adopted policies RA13 and RA14 must be reviewed against application of the NPPF; in particular the approach to development in rural areas at Paragraph 55 and to ensure policies do not work to preclude development where the presumption in favour of sustainable development at Paragraph 14 should apply. • Policies within the Vale of Aylesbury Local Plan should

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reflect the relationship between providing for a broad range of economic development needs and making effective use of previously developed land which are both principles under Paragraph 17 of the NPPF. • It is essential that a new Employment Land Assessment is prepared – ideally alongside the SHLAA – to capture the broad range of development opportunities for employment generation and economic development that exist across the District.

Question 4 • It is essential that evidence gathered through the Scoping Consultation stage is used positively and constructively to aid preparation of a sound plan. • Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. • It is considered that the Council should seek to engage with those representing all sites put forward during the consultation at the earliest opportunity. • The current timetable for plan preparation, anticipating an Issues and Options consultation in summer 2014 and Pre-Submission Plan consultation in summer 2015 should be used to provide scope for this engagement.

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<input checked="" type="checkbox"/> Agent	Organisation	<input type="text" value="Barton Willmore LLP"/>	Agent Name	<input type="text" value="Barton Willmore LLP"/>	Agent Alias	<input type="text" value="Sara Dutfield"/>
Uniform Ref	<input type="text" value="06494"/>	<input checked="" type="checkbox"/> Keep_informed	<input type="checkbox"/> Duty to Co-operate Body			
Customer Alias	<input type="text"/>	Customer Name	<input type="text" value="Hampden Fields Consortium"/>	Organisation	<input type="text" value="Barton Willmore LLP"/>	
Customer_Class	<input type="text" value="Developer Interest"/>					

## Summary of Comments

Question 1 – We consider that all of the policies listed are appropriate and should be included within any proposed Local Plan. Whilst we note that the policy topics are merely headings, the content of each topic should be drafted on the basis of up to date evidence including an objective assessment of need to establish the overall housing numbers and employment figures to be included within the plan.

Reference to site allocations only being included “if needed” is misleading and gives the impression it may not be necessary. It is clear, given the latest household projections that an objective assessment of need will demonstrate a requirement for substantial housing numbers to be provided for within Aylesbury Vale District. If this local plan is intended to deal with all planning policy matters (negating the need for any further plans to be produced) as recommended by the NPPF, then strategic site allocations will have to be included and this should be made clear at the outset. Also particularly relevant given the intention for some neighbourhood plans to contain site allocations, which must be in accordance with the Local Plan.

Question 2 – The NPPF is clear that Local Planning Authorities should prepare a single Local Plan for its area containing all of the policies (both strategic and detailed) whilst ensuring that there is no repetition of matters and policies already set out in national policy. With this in mind we consider that policies in relation to the following should also be included: Flood protection; Pollution and noise; Heritage; Landscape, the natural environment and green infrastructure; Community needs including community facilities and open space provision; Transportation and highways; Town centres and shopping.

Question 3 – The strategy should clearly set out the objectively assessed development needs of the district, taking account of unmet needs arising from those districts lying around the edges of the Vale and further afield within the Strategic Housing Market Area, green belt-constrained districts to the south and Greater London. The plan should therefore set out clearly the housing and development requirements resulting from these assessments and how they will be catered for across the district as a whole. The plan should make clear: “What is intended to happen in the area over the life of the plan, where and when this will occur and how it will be delivered” (NPPF and NPPG). The overall spatial strategy and any policies contained within the plan should be based upon a sound and up to date proportionate evidence base, which has been prepared for the purposes of this Local Plan and should not rely upon the evidence base used for the withdrawn Vale of Aylesbury Plan which is now out of date.

Question 4 – The VAP Inspector concluded that the Council had failed to comply with the Duty to Co-operate as it had not genuinely co-operated or collaborated with other authorities within the housing market area in a constructive, active and ongoing way. It is imperative that the Council actively engages with the authorities within the Strategic Housing Market Area in the preparation of this plan and ensures that the

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housing and employment figures included within the plan have been objectively assessed and taken matters such as unmet need from other authorities into account.

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<input checked="" type="checkbox"/> Agent	Organisation	<input type="text" value="David Lock Associates"/>	Agent Name	<input type="text" value="David Lock Associates"/>	Agent Alias	<input type="text" value="Nick Freer"/>
Uniform Ref	<input type="text" value="06503"/>	<input checked="" type="checkbox"/> Keep_informed	<input type="checkbox"/> Duty to Co-operate Body			
Customer Alias	<input type="text"/>	Customer Name	<input type="text" value="Hallam Land Management"/>	Organisation	<input type="text" value="David Lock Associates"/>	
Customer_Class	<input type="text" value="Developer Interest"/>					

## Summary of Comments

Question 1 –Hallam Land Management (HLM) welcomes the opportunity to comment at this early stage in the preparation of the Vale of Aylesbury Plan (VALP). HLM have land interests around Aylesbury and Buckingham We do not wish to raise any particular issues with the topic areas which it is proposed to address.

Question 2 – No comments.

Question 3 – No comments.

Question 4 – Strongly encourage Aylesbury Vale District Council to adopt a positive and proactive approach in preparing the overall strategy for the District, whilst adopting a focused approach in preparing delivery policies. The Council is urged to make development control provision only in those areas where it is absolutely necessary to do so. The emerging VALP needs to be in accordance with national guidance. The NPPF introduced an obligation to plan positively and not to unduly burden or delay sustainable development. The NPPF (para 158) requires Local Plans to be based on up-to-date evidence base. Without such, HLM are not in a position to make any specific suggestions about what the strategy or policies the VALP should contain. In order for the VALP to be found sound, the Council should revisit all the evidence that formed part of the withdrawn Vale of Aylesbury Plan and must produce a new and comprehensive evidence base in respect of objectively assessed need. This is especially necessary in relation to housing requirements, given the Inspector's guidance in relation to the soundness of the VAP in relation the duty to cooperate and potential housing need. The Council must have a clear understanding of housing needs in their area (NPPF para 59) and undertake early and meaningful engagement with neighbouring local authorities and considers fully the dynamics which influence the strategic housing market area. In particular there is a need to properly address the role of the Vale in meeting unmet needs from within neighbouring areas (including London) and the implications of infrastructure projects which have and will alter how people move around Aylesbury Vale. Equally objectively assessed need must reflect and prioritise the need to address, first, market signals, second, affordable housing need, and third, economic growth prospects and aspirations. In preparing a positive strategy in the VALP, the Council should seek to not only accommodate economic growth but set a positive agenda for enhancing economic activity in the District. Enclosed the comments which were made on behalf of HLM at Reg 18 Stage.

# Vale of Aylesbury Local Plan Regulation 18 - Scoping Summary Report

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Agent Organisation  Agent Name  Agent Alias

Uniform Ref   Keep\_informed  Duty to Co-operate Body

Customer Alias  Customer Name  Organisation

Customer\_Class

## Summary of Comments

Question 1 – Gladman support the inclusion of the six key topic areas as identified above, however remind the Council of the need to ensure that these are approached in a positive and ambitious manner and are based on robust, up to date evidence, as required by paragraphs 158 & 159 of the NPPF. The robustness of the proposed housing requirement was a key area of contention with the VAP and significant deficiencies were identified by the Inspector and numerous objectors. The Council need to ensure that through the VALP they are identifying a strategy which, as required by the NPPF & NPPG, seeks to meet the full objectively assessed needs for market and affordable housing and in doing so ensures that any unmet need for neighbouring areas is accommodated where reasonable to do so.

Question 2 – Fundamental omissions from the proposed content and scope of the VALP, which if they continued to not be recognised could result in a Plan which again does not meet the tests of soundness identified in paragraph 182 of the framework.

Namely, the rural areas and ensuring sufficient growth is directed to these types of settlement. Rural area and settlements such as Winslow appear not to be given the same degree of focus at Aylesbury and Buckingham. Need for understanding of the issues affecting all elements of the District including rural areas, and clarity over the scale of housing growth needed in these areas. The Council should assess the impact that delivery of a lesser scale would have on such settlements in terms of the vitality of existing services and communities and do not restrict the rural areas from achieving their potential. The rural areas offer a viable and sustainable development locations and require sustainable growth moving forwards to meet their own needs. Reference to The Sustainable Development Plan for Rural Aylesbury Vale (submitted by Gladmans to the Council as part of representations to the VAP) – references it findings that majority of the spatial area of the Vale is the Rural Areas and contain well over 100 settlements and references the current distribution of people, services and infrastructure as well as the impact of important committed investment in the rural parts of the District, not least the East West Rail Link. A further omission in the scoping consultation, the lack of any reference to east west rail and the opportunities and growth potential that this will create for settlements within the District, for example Winslow following the planned new railway station. Opportunities such as for east west rail and the growth potential this may result in should be a key feature of the Local Plan Strategy. If the Council fail to recognise factors such as this there would be a significant missed opportunity.

Question 3 – Gladman refer the Council to previous submissions made in response to the VAP (letter to John Byrne Head of Planning 12th March 2013, Consultation response to the Vale of Aylesbury Plan Strategy May/June 2013, EiP Hearing Statements, November 2013) Within these submissions Gladman provided the Council with the following: Alternative Strategic Housing Market Assessment/OAN (prepared by Regeneris Consulting), Sustainable Development Plan for the Rural Areas of Aylesbury Vale (prepared jointly by Gladman Developments, GVA

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Hourigan Connolly, Development Economics and Simon Turner Consulting). The OAN report prepared by Regeneris outlines the scale of housing need within the District and was consistent with the published national policy at the time, Gladman recognise this may need updating (with regard NPPG) and the increased emphasis placed on market signals and the need for upwards adjustments to housing requirements. The Council need to properly assess the unmet need for neighbouring authorities and should work in collaboration with these areas to ensure the housing needs of the wider area are capable of being met (and meet the duty to cooperate). The Sustainable Development plan for the rural areas of Aylesbury Vale provided a detailed plan for the rural area of the District, with a up to date and robust evidence base to support the proposed strategy. The Sustainable Development Plan for Rural Aylesbury Vale (Gladmans) provides a detailed framework to ensure the sustainable futures of these settlements and the attractive environmental and built context in which they exist.

Question 4 – The Council need to ensure that the development industry is engaged with proactively throughout the plan preparation process to avoid a further repeat of the problems encountered in the last two attempts to produce a local plan.

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<input checked="" type="checkbox"/> Agent	Organisation	<input type="text"/>	Agent Name	<input type="text"/>	Agent Alias	<input type="text"/>
Uniform Ref	<input type="text" value="06505"/>	<input checked="" type="checkbox"/> Keep_informed	<input type="checkbox"/> Duty to Co-operate Body			
Customer Alias	<input type="text" value="Sarah Conlan"/>	Customer Name	<input type="text" value="Crest Strategic Projects"/>	Organisation	<input type="text"/>	
Customer_Class	<input type="text" value="Developer Interest"/>					

## Summary of Comments

Question 1 – The topic areas listed are appropriate, save some omissions (covered in our response to question 2). Crest notes that the consultation stage is initial and hence that a full detailed Regulation 18 consultation will follow in the summer of next year where there will be more detail on which to comment. In broad terms, Crest agrees that AVDC should produce a single Local Plan.

In Crest's experience this could take a three part format (Part 1: Strategy, Part 2: Sites and Part 3: Development Management policies). Given the pressing housing needs, Crest encourages greater attention and progress with both Part 1 and 2. To be effective, and ensure a deliverable five year supply, the Local Plan will need to allocate additional sites and, where appropriate, safeguard future sites. The proposed timescales (in particular the time between Reg 18 and Reg 19) should be reviewed to ensure that it is achievable and follows due process.

Question 2 – Yes. When viewed against the NPPF, the following topics do not appear in the Council's list of proposed content: Heritage; Environment; Health (facilities and open space); Transport; Communications Infrastructure. These matters will need to be covered within the complete Local Plan, and where appropriate contain specific site references / principles for site development. Crest notes that point 3 of the consultation outlines that the Local Plan shall include site allocations 'if required'. AVDC needs to outline a positive approach to plan making, and hence the allocation of land for development (or otherwise, for example green infrastructure) is critical. To meet the housing needs, it is likely that strategic land will be required. This needs to be outlined to key community and stakeholders at this early stage, in order to obtain the most buy-in and input to the plan making process. This will also assist with the compilation of a robust evidence base. The achievement of sustainable development and allocation of land for new homes / communities provides for substantial social and economic benefits.

Question 3 – Crest wishes to make a number of points in respect of the approach which the VALP should take on housing, the plan period, the spatial strategy and in conforming with the Duty to Co-operate. **Approach to Housing – NPPF** - The NPPF outlines a clear requirement to deliver sustainable development and to widen the choice of high quality homes (paragraph 9, key points underlined here and throughout). It is therefore crucial that a robust objectively assessed housing level is identified (as required by the NPPF); this may be at a level higher than the actual planned provision in the emerging development plan. However, the evidence base on housing should not be constrained or subject to interference from erroneous factors, for example any environmental constraints. National planning policy is clear that AVDC need to plan for a significant increase in the supply of housing. **Plan Period & Start Date** - Given the likely timescales of the plan production (recent Local Plans have typically taken anywhere between 4 - 6 years to produce, including Examination), AVDC may wish to extend the plan period beyond 2031. This would ensure that the plan seeks to plan positively, over a 15 year future period (NPPF paragraphs 47 and 157), and is not adopted part way through this timeframe.

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In respect of the plan start date, AVDC should either base this on 2006 or 2011 in order to ensure that the projected employment/ housing levels have regard to past performance (based on the former South East Plan - SEP). It is also relevant to ensure that the plan period is aligned with the emerging Local Plan for Milton Keynes. In conclusion, AVDC shall need to plan positively over a longer time-frame.

**Spatial Strategy – Housing Apportionment.** Crest suggests that the AVDC considers preparing joint evidence with Milton Keynes Council (MKC) in respect of updating the longer term spatial strategy for the town and adjoining areas, including housing need. To accord with the NPPF, notably the need to plan positively to meet the objectively assessed housing needs and deliver a ‘significant boost’ in the supply of housing, there is every reason to return the principle of incorporating a proportion of Milton Keynes/ wider HMA growth in the plans for Aylesbury Vale.

**Duty to Co-operate –** it is evident from the Inspector’s note on the now withdrawn Aylesbury Vale Plan (VAP) that AVDC now needs to embrace updated guidance on the Duty, in order to ensure a sound plan. It is important therefore that AVDC liaises closely with Milton Keynes Council (MKC) and Central Bedfordshire (CB). This will also need to incorporate input from Buckinghamshire County Council (BCC).

**Meeting Objectively Assessed Needs - The Duty to Co-operate** has particular significance when providing for future housing needs. It is clear from the commentary in the various Inspectors’ letters that the level of housing required within Aylesbury Vale and the potential need to accommodate growth from Milton Keynes has not yet been robustly assessed or tested. The emerging plan will need to carry out this assessment with cooperation and input from other authorities notably Milton Keynes. Crest suggests that input is also received from the development industry to achieve this.

**Defining the Housing Market Area (HMA) -** It is important to derive a housing market area, based on sub-regional evidence, as part of meeting the Duty to Co-operate. CURDS at Newcastle University have formulated a range of non-overlapping strategic HMAs based on migration, travel to work flows and house prices.<sup>1</sup> There are two levels of detail in their results. Also reference to the Census data which suggests that the most significant flows are between Aylesbury Vale and Milton Keynes, Wycombe, Dacorum, Central Bedfordshire, Cherwell, Chiltern, South Oxfordshire and South Northamptonshire.

**Household Projections & the National need for new homes –** Reference to the 2008 Household Projections and 2011 Interim Household Projections. Work by Alan Holmans for the Town and Country Planning Association.<sup>2</sup> The CURDS HMA is a good starting point for identifying the other local authorities that it will be important for Aylesbury Vale to communicate with under the Duty to Cooperate. In addition, the nature and position of Aylesbury Vale itself means that other local authorities need to be considered. At a minimum, these include Milton Keynes, Wycombe, Dacorum, Central Bedfordshire, Cherwell, Chiltern, South Oxfordshire and South Northamptonshire. The connection to London is also an important factor. Joint evidence base or complimentary studies will be required, notably with those Local Authorities who are presently preparing local plans (or plan reviews), this includes Central Bedfordshire and Milton Keynes.

There is a continuing trend toward smaller households, which is driving further need for housing.

**Housing Need at a Regional Level -** Holmans’ work for the TCPA provides regional projections of housing need. Comparison of these against the most recent adopted or published emerging housing targets (as at February 2014) across the South East and East of England regions reveals a shortfall of over 17,250 new homes per annum (most recently adopted or emerging planned provision against the ‘starting point’ for housing needs). The indigenous needs of Aylesbury Vale, based on the Holmans projections are in the order of 823 dpa (as set against SNPP evidence which indicates 1,087 dpa – as outlined), however the Holmans projections are national and hence pay no attention to local factors such as affordability, economic growth projections or market capacity. The SNPP projections pay no attention to unmet needs elsewhere. <sup>2</sup>A

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more credible level of provision would take account of unmet needs elsewhere in the South East (notably London) and constraints elsewhere. Aylesbury Vale in this context is relatively unconstrained, and located adjacent to a major regional centre, Milton Keynes.

The potential growth of Milton Keynes cannot solely be accommodated within the existing urban area (even that presently planned to 2026), as indicated by the recently adopted Core Strategy (which made

Question 4 – Crest wishes to outline the benefits of the promotion of Shenley Park for a sustainable new community, and garden suburb urban extension to Milton Keynes. A site plan accompanies the representation alongside a separate Vision Document. Crest states that the development aligns directly with a number of the policies and aspirations of Aylesbury Vale District Council (AVDC) and Milton Keynes Council (MKC), as well as according with the NPPF definition of sustainable development (paragraph 7).

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Agent Organisation  Agent Name  Agent Alias

Uniform Ref   Keep\_informed  Duty to Co-operate Body

Customer Alias  Customer Name  Organisation

Customer\_Class

Summary of Comments

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# Vale of Aylesbury Local Plan Regulation 18 - Scoping Summary Report

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<input checked="" type="checkbox"/> Agent	Organisation	<input type="text"/>	Agent Name	PEGASUS GROUP	Agent Alias	<input type="text"/>
Uniform Ref	06488	<input checked="" type="checkbox"/> Keep_informed	<input type="checkbox"/> Duty to Co-operate Body			
Customer Alias	R Watts	Customer Name	M & G UK PLP	Organisation	<input type="text"/>	
Customer_Class	Developer Interest					

## Summary of Comments

Question 1 - Agreed that the six topic areas are appropriate for inclusion within the new Vale of Aylesbury Local Plan (VALP).

Question 2 - No comments.

Question 3 - Need to plan for higher levels of growth. The Inspector of the Vale of Aylesbury Plan (VAP) concluded that the overall provision of housing and jobs had not been positively prepared, not justified or effective, and not consistent with national policy. Furthermore, the Inspector concluded that the Council had not engaged with neighbouring Councils and others constructively, actively and on an ongoing basis. Accordingly, there are strategic housing issues which need to be effectively resolved as soon as possible (paragraph 182 of the NPPF). VALP will need to plan both for higher levels of own growth generated within Aylesbury Vale but to also contribute towards the needs of other Authorities. Integral to achieving this will be the need to establish an effective and ongoing level of co-operation with adjoining and other relevant Authorities. The now withdrawn VAP housing growth was close to the bottom of the overall range of options consulted upon (13,500 additional houses from a range of 12,000 to 21,000). This level of growth was proposed even though the assessments indicated that there were no fundamental environmental or infrastructure constraints to higher levels of growth within the overall range identified. Given the acknowledged need to meet your own and others needs, it is apparent that Aylesbury Vale is relatively unconstrained and has the potential to deliver a much higher level of growth than originally proposed and is a direction which the emerging VALP should be moving towards as it progresses in its preparation. Aylesbury is the main town in the District and therefore the settlement together with its environs should be the focus for the majority of the District's growth due its sustainability credentials.

Question 4 – No comments.

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Agent Organisation  Agent Name  Agent Alias

Uniform Ref   Keep\_informed  Duty to Co-operate Body

Customer Alias  Customer Name  Organisation

Customer\_Class

## Summary of Comments

Question 1 – would like to see specific policies on flood risk, drainage, and water quality. Also suggest there should be specific policies on enhancement of river and stream corridors, biodiversity enhancement, and green infrastructure.

Question 2 – No comments.

Question 3 - Only water compatible development will be permitted in the functional floodplain, and essential infrastructure if it passes the Exception Test. Any proposed development on land within Flood Zones 2 or 3 will be sequentially tested in order to steer development to lower flood risk areas. Land that is considered to be required for current and future flood management will be safeguarded from development. Also suggest specific wording for inclusion in future policies.

Question 4 - A sequential approach must be taken in the allocation of any strategic sites, avoiding any new development in Flood Zones 2 or 3 if possible. We recommend that waste collection could be incorporated into the policy on design.

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Uniform Ref	<input type="text" value="00048"/>	<input checked="" type="checkbox"/> Keep_informed	<input checked="" type="checkbox"/> Duty to Co-operate Body			
Customer Alias	<input type="text" value="Mr M Small"/>	Customer Name	<input type="text" value="English Heritage&lt;br/&gt;South East Region"/>	Organisation	<input type="text"/>	
Customer_Class	<input type="text" value="Environmental Organisation"/>					

## Summary of Comments

Question 1 – Yes

Question 2 - Yes – the historic environment. This needs to be considered at both the strategic and detailed development management level.

Question 3 - The National Planning Policy Framework sets out a number of requirements for local plans in respect of the historic environment in addition to the general requirement for local plans to take the NPPF into account [2] and be consistent with NPPF principles [151]. The NPPF requires Local Plans to set out, in summary, a positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment. The strategy should include strategic policies to deliver the conservation and enhancement of the historic environment and heritage assets most at risk through neglect, decay or other threats. It is critical that the VALP contains a strategic policy or policies for the historic environment as neighbourhood plans need only conform with the strategic policies of the Local Plan. It is also our view, however, that a positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment needs to encompass the recognition of the importance of the historic environment to the character, economy and quality of life of the District through references throughout the Plan. It was our view that the previous VAP Strategy did not give a real sense that the Council had such a positive and clear strategy and we will look to this being addressed in the VALP. As regards housing allocations, English Heritage will expect the Council to take full and proper account of the historic environment in allocating potential sites, including historic landscape character assessment, other historic characterisation exercises and the need to conserve and enhance heritage assets. We will expect the Council to demonstrate how the historic environment has influenced its choice of sites, and to set out detailed overriding justification if it proposes the allocation of any sites that would have an adverse impact on a heritage asset or assets. As part of the positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment required to be set out in Local Plans by the NPPF, English Heritage will expect to see full and proper regard to be had to the conservation and enhancement of the historic environment in the historic town centres in Aylesbury Vale in any policies or proposals for those town centres. Question 4 - English Heritage would welcome the opportunity to discuss the Council's approach to the historic environment in the VALP, both formally during and informally outside the formal consultation periods. We would also welcome the opportunity to provide informal comments on potential housing and other site allocations at an early stage.

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Agent Organisation  Agent Name  Agent Alias

Uniform Ref   Keep\_informed  Duty to Co-operate Body

Customer Alias  Customer Name  Organisation

Customer\_Class

## Summary of Comments

Question 1 – No comments.

Question 2 – No comments.

Question 3 -1. The Board welcomes the fact that the Council has identified that the new Local Plan document should include policies on design. The Board hopes that as part of the drafting of the Local Plan full consideration is given to local distinctiveness. Within the Chilterns AONB and its setting the Board considers that the principles within the Chilterns Buildings Design Guide and the supplementary technical notes on Chilterns building materials (flint, brick and roofing materials) should be applied alongside any design policies and any district-wide design advice. The Board considers that the Vale of Aylesbury Local Plan should include a specific policy which seeks the conservation and enhancement of the natural beauty of the Chilterns AONB and its setting. The Board also considers that the Vale of Aylesbury Local Plan should include specific policies which deal with the protection of environmental and heritage assets (including biodiversity, landscape and heritage). Any proposed policies should include criteria for assessing proposals.

Question 4 – No comments.

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Uniform Ref	<input type="text" value="00097"/>	<input type="checkbox"/> Keep_informed	<input checked="" type="checkbox"/> Duty to Co-operate Body			
Customer Alias	<input type="text" value="Mr Chris Schmidt-Reid"/>	Customer Name	<input type="text" value="Wycombe District Council"/>	Organisation	<input type="text"/>	
Customer_Class	<input type="text" value="Adjoining Local Authority"/>					

## Summary of Comments

Question 1 - As part of the Vale of Aylesbury Local Plan we also think it is important to acknowledge the links between our two districts in terms of the good functional links (including road and rail links), evidence of strong migration and commuting flows (including a notable level of net migration from Wycombe to Aylesbury Vale and a notable level of net commuting from Aylesbury Vale to Wycombe. Consideration of these links should be given to any potential impacts of growth in Aylesbury on the A4010 and it's role as a route through Wycombe connecting to the Thames Valley. We also think that there should be consideration given in the plan to meeting un-met needs of neighbouring authorities, and this is something we will clearly want to work through more closely with you in terms of the underlying evidence for this in particular.

Question 2 – No comments.

Question 3 – See 1 above.

Question 4 – No comments.

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Agent Organisation  Agent Name  Agent Alias

Uniform Ref   Keep\_informed  Duty to Co-operate Body

Customer Alias  Customer Name  Organisation

Customer\_Class

## Summary of Comments

Question 1 - Railway infrastructure (i.e. increased footfall at railway stations) and how developer contributions can be included in S106 agreements / CIL contributions to mitigate the impacts at stations (e.g. increased car parking, CCTV, customer information systems, additional shelters).

Question 2 - The impact should be considered by proposals for increased numbers of dwellings or new businesses on level crossings. We believe that proposals that impact upon level crossings should include S106 or CIL contributions to mitigate the impacts of those developments.

Question 3 – No comments.

Question 4 – No comments.

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Uniform Ref	<input type="text" value="00108"/>	<input checked="" type="checkbox"/> Keep_informed	<input type="checkbox"/> Duty to Co-operate Body			
Customer Alias	<input type="text" value="Mr Peter Marsden"/>	Customer Name	<input type="text" value="Buckinghamshire&lt;br/&gt;Archaeological&lt;br/&gt;Society"/>	Organisation	<input type="text"/>	
Customer_Class	<input type="text" value="Environmental Organisation"/>					

## Summary of Comments

Question 1 – Topic areas listed are not adequate, they should include policies for the heritage and historic environment.

Question 2 – The NPPF sets out a number of factors that LPA's should take into account in framing a positive strategy for the conservation and enjoyment of the historic environment. We expect VALP to include at the top level the key elements of such a strategy for the historic environment.

Question 3 – We note that the PPG encourages LPA's to address various heritage issues that are of benefit to the public, even though they may not be in themselves the subject of statutory requirements. In our view the VALP should contain a policy committing AVDC unambiguously to the strategic value of the Heritage Environment Record.

Question 4 – No comments.

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<input type="checkbox"/> Agent	Organisation	<input type="text"/>	Agent Name	<input type="text"/>	Agent Alias	<input type="text"/>
Uniform Ref	<input type="text" value="00115"/>	<input type="checkbox"/> Keep_informed	<input checked="" type="checkbox"/> Duty to Co-operate Body			
Customer Alias	<input type="text" value="Mrs L Currie"/>	Customer Name	<input type="text" value="Oxfordshire&lt;br/&gt;County Council"/>	Organisation	<input type="text"/>	
Customer_Class	<input type="text" value="Adjoining Local Authority"/>					

## Summary of Comments

Question 1 - No comments.

Question 2 - It is not clear how transport issues, policies and proposals, including how any requirements for improved strategic transport infrastructure will be covered by the VALP. It is important that the transport impacts of growth proposals within Aylesbury Vale on the Oxfordshire network are fully assessed, taking account of planned growth within Oxfordshire, and the VALP contains policies and proposals to deliver necessary mitigating measures. Education impacts also need to be covered as there is potential for significant interaction between Oxfordshire and Aylesbury Vale. Any new or improved education facilities required to support growth, its phasing, funding and delivery mechanisms should be set out in the community services section of the plan.

Question 3 - Oxfordshire County Council encourages AVDC to fully explore all reasonable strategy options for accommodating its objectively assessed housing, employment and infrastructure needs to ensure that as far as possible the district's development needs are met within its boundaries and there is no need to approach neighbouring authorities to ask them to take on unmet needs. Oxfordshire County Council would be concerned in the event that Oxfordshire were to be expected to find land for any of Aylesbury Vale's unmet needs, both in terms of the requirements for supporting strategic infrastructure and likely environmental impacts. In assessing strategy options Oxfordshire County Council suggests that AVDC may particularly want to consider the potential for strategic housing and employment allocations to make the best use of (and benefit from) committed investment in the rail network and the enhanced connectivity this would bring. This would reduce the impact of car-based travel on the highway network between Oxfordshire and Aylesbury Vale, particularly the A41 and A418. Policies should identify the infrastructure required to support new development, particularly strategic transport and education infrastructure, and seek to ensure that it will be fully funded and delivered in a timely way. Question 4 - Oxfordshire County Council will work jointly with AVDC to ensure the following issues are fully considered in the preparation of VALP. An assessment of the transport impacts of any employment and housing development planned for Aylesbury and elsewhere on the A41 corridor cumulative to the growth planned at Bicester plus identification of a programme of mitigating measures that is affordable and funded by development. How any proposals for employment growth in Aylesbury Vale might compromise - or complement - aspirations for jobs growth in Bicester. Impacts of any potential growth on the A 418 corridor alongside growth already planned at Thame. Opportunities for improved bus services on the back of growth. Education potential for cross-boundary movement of school children between Aylesbury Vale and Oxfordshire. Any other emerging service infrastructure issues which have cross-border implications.

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<input type="checkbox"/> Agent	Organisation	<input type="text"/>	Agent Name	<input type="text"/>	Agent Alias	<input type="text"/>
Uniform Ref	<input type="text" value="00120"/>	<input checked="" type="checkbox"/> Keep_informed	<input checked="" type="checkbox"/> Duty to Co-operate Body			
Customer Alias	<input type="text" value="Sir/Madam"/>	Customer Name	<input type="text" value="Cherwell District Council"/>	Organisation	<input type="text"/>	
Customer_Class	<input type="text" value="Adjoining Local Authority"/>					

## Summary of Comments

Question 1 - Yes, we consider that the topic areas listed are appropriate for inclusion.

Question 2 - A policy setting out the Plan's presumption in favour of sustainable development in accordance with the NPPF might be considered helpful. You may wish to also include policy and guidance on transport. Town centres (the strategic hierarchy, and development management policies on impact assessments, changes of use, town centre boundaries, primary and secondary shopping frontage, and so on) Village categorisation, Rural exception sites. In terms of site allocations, these may also be required for renewable and low carbon energy sources and supporting infrastructure (paragraph 97 of the NPPF). In terms of housing and employment allocations, will the Plan include all allocations or strategic allocations only? In which case, would a specific size threshold be used? Provisions for monitoring the effectiveness of the Vale of Aylesbury Plan policies would also be helpful.

Question 3 - Cherwell District Council is committed to fulfilling its Duty to Cooperate in engaging with Aylesbury Vale District Council in the preparation of the new Vale of Aylesbury Local Plan, and the two Councils have engaged constructively on the Cherwell Local Plan, which is currently undergoing formal Examination. In general terms it is important to take account of the cross boundary implications of housing, economic and retail development in the main service centres of the two districts; whilst at Bicester specifically it is important to acknowledge the role of Bicester as a service centre that is used by rural communities in western Aylesbury Vale (and, vice versa, the role of settlements in Aylesbury Vale that may be used for service provision by communities in Cherwell). A Memorandum of Understanding (MoU) has been prepared between Cherwell District Council, Aylesbury Vale District Council, Buckinghamshire County Council and Oxfordshire County Council regarding strategic issues related to the A41 between Bicester and Aylesbury. Paragraph 1.2 of the MoU notes that "the impact of new housing, employment, and other committed and planned growth (either through planning applications, appeals or policy documents) along the A41 in either district therefore potentially has implications for the other local planning authority in terms of capacity and improvements needed to the A41 between Bicester and Aylesbury". The Councils have committed to effective cooperation on this issue in terms of engagement, sharing information, and the councils agreeing on any infrastructure and mitigation planning and delivery. This will be a key issue for the preparation of the Vale of Aylesbury Local Plan. Cherwell District Council welcomes this formal consultation opportunity and looks forward to further positive engagement with Aylesbury Vale District Council in moving forward with the new Vale of Aylesbury Local Plan.

Question 4 -The new Vale of Aylesbury Local Plan proposes a plan period to 2031, which accords with the National Planning Policy Framework's advice regarding a 15 year time horizon. However this is predicated on the Plan being adopted in Summer 2016. It may be

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prudent to expand the plan period at this Scoping stage, to allow for any delay in the timescale whilst maintaining a 15 year time horizon post adoption.

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# Vale of Aylesbury Local Plan Regulation 18 - Scoping Summary Report

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Agent Organisation  Agent Name  Agent Alias

Uniform Ref   Keep\_informed  Duty to Co-operate Body

Customer Alias  Customer Name  Organisation

Customer\_Class

## Summary of Comments

Question 1 – Yes

Question 2 – Broad locations for development should also be identified within which specific allocations of land for different purposes in order to give an indication of where particular opportunities apply. The spatial strategy should focus on the opportunities for sustainable growth, which are likely to focus on the key settlements of the District. Reference should be made in the Plan for the need to comply with the NPPF requirement to deliver a 5 year housing land supply across the District.

Question 3 – The settlements of Aylesbury, Buckingham, Haddenham, Wendover and Winslow have long been identified as strategic. All 5 should therefore be identified as key settlements at which to focus new growth. In particular, Winslow also serves a large rural community between Buckingham and Aylesbury, and a new station is to be provided as part of the East West Rail scheme. There is therefore a key opportunity in planning for sustainable development at Winslow. Housing numbers should be based on an up to date SHMA but also on outcomes of duty to cooperate. Aylesbury Vale is a relatively unconstrained District and has the ability to assist neighbouring Authorities in providing for objectively assessed housing needs in a sustainable way.

Question 4 – The plan period should be extended up to 2036 in case of slippage in the overall timetable.

# Vale of Aylesbury Local Plan Regulation 18 - Scoping Summary Report

June 2014



Agent Organisation  Agent Name  Agent Alias

Uniform Ref   Keep\_informed  Duty to Co-operate Body

Customer Alias  Customer Name  Organisation

Customer\_Class

## Summary of Comments

Question 1 – no specific comments.

Question 2 – no specific comments.

Question 3 - Anglian Water promotes the use of water efficiency measures and we would be keen for this to be included within the document. The foul flows generated from any future growth will have an impact on the Water Recycling Centre (WRC) formally known as Sewerage Treatment Works. We are unable to comment on the impact of growth at this early stage of your plan. Any required upgrades will be funded by Anglian Water however they will need to be planned and funded through our 5 year business plan, approved by our economic regulator Ofwat. However, we would want the document to clearly state that no development can come forward prior to confirmation of available capacity at the relevant WRC. We can look at this in more detail when potential sites have been identified to assess the impact of potential growth. We would want the document to clearly state that a foul drainage solution will need to be identified and implemented prior to occupation. This should be at a strategic level in the form of a master plan. Master planning can provide a good opportunity to ensure infrastructure is provided in the most environmentally sustainable and cost effective manner. We recommend you include the need for master planning to avoid a piecemeal approach to development and support holistic infrastructure planning. All developments should seek to reduce flood risk and incorporate Sustainable Drainage Systems (SuDS). We would wish to see in policy that all developments should adhere to the surface water management hierarchy outlined in Part H of Building Regulations with disposal to a surface water sewer seen as a last resort. Under no circumstances will surface water be permitted to discharge to the public foul sewerage network.

Question 4 –No specific comments.

# Vale of Aylesbury Local Plan Regulation 18 - Scoping Summary Report

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Customer\_Class

## Summary of Comments

Question 1 - The Committee would like clarification on whether 'local distinctiveness' will be defined by AVDC or BTC and how industrial development will be balanced against possible harm to residents. It was also felt that there should be more detail on infrastructure development; that site allocation for gypsy and traveller accommodation should be included; and that cultural facilities should be specifically listed along with health, sports and leisure provision.

Question 2 - Should include green corridors within built-up areas as well as green belt. Transport infrastructure should be included, related to the increased demands of an expanding population. This should consider East-West Rail, park-and-ride schemes, bus provision and routes, pedestrian and cycling infrastructure, and the increase in heavy traffic movements to and from the HS2 depot.

Question 3 – No specific comment.

Question 4 – No specific comment.

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Agent Organisation  Agent Name  Agent Alias

Uniform Ref   Keep\_informed  Duty to Co-operate Body

Customer Alias  Customer Name  Organisation

Customer\_Class

## Summary of Comments

Question 1 – Yes

Question 2 – No, assuming that item 6, Infrastructure Delivery Plan, includes a major review of the existing public transport infrastructure and how that will be improved to reduce reliance on private cars.

Question 3 - Policies need to take into account the existing very high net out-commuting from the District for employment. Current level of out-commuting relies to a great extent on the use of private cars which is both undesirable and environmentally unsustainable. The VAP Examination took the view that more housing would be required to support the planned level of jobs growth, Reducing the number of new jobs to create the sort of balance that the Inspector believes to be appropriate is clearly not the answer, as that would restrict economic growth. The Plan therefore needs to find a way of creating employment growth that not only sustains the planned housing growth but also reduces the current need for out-commuting for employment. The housing and job strategies therefore need to be interlinked. The policies need to identify how job densities in the principal employment centres will be improved and how that will be linked to new housing in a manner that will reduce the extent of commuting by private car. This will almost certainly involve fundamental improvements to the public transport infrastructure.

Question 4 - The VAP proposed too great a proportion of new homes in the rural areas remote from Aylesbury, which is the principal centre of employment, retail, education, healthcare, cultural, recreation and other community services within the District. This would have resulted in additional travel from the rural areas to access those services, much of which would inevitably be by private car. Furthermore, the VAP did not address the spatial distribution imbalance that occurred over the period of the previous development plan, AVDLP, when the proportion of new homes delivered in Aylesbury compared with the rural areas was much lower than planned. This spatial imbalance needs to be addressed in the VALP.

# Vale of Aylesbury Local Plan Regulation 18 - Scoping Summary Report

June 2014



<input checked="" type="checkbox"/> Agent	Organisation	<input type="text"/>	Agent Name	<input type="text"/>	Agent Alias	<input type="text"/>
Uniform Ref	<input type="text" value="06308"/>	<input checked="" type="checkbox"/> Keep_informed	<input type="checkbox"/> Duty to Co-operate Body			
Customer Alias	<input type="text" value="Mr O Taylor"/>	Customer Name	<input type="text" value="Mr Oliver Taylor"/>	Organisation	<input type="text"/>	
Customer_Class	<input type="text" value="Developer Interest"/>					

## Summary of Comments

Question 1 – Yes. The policy topics listed for inclusion are appropriate if they adhere to paragraphs 156 and 157 of the National Planning Policy Framework (see policy extract on Supplementary Comment).

Question 2 – No comments.

Question 3 – The Local Plan should contain provisions for the allocation of land at the Strategic Towns and Larger Villages. Specifically, the land at A413 Aylesbury Road, Padbury should be allocated for residential development – see accompanying correspondence to ‘Call for Sites’. The provisions of the Vale of Aylesbury Local Plan should: 1. Have a clear understanding of housing needs in their area and allocate sites for development. 2. Be based on up-to-date information about the natural environment and other characteristics of the area. 3. Give careful attention to viability and costs in plan-making and decision-taking. The Local Plan must be ‘deliverable’. The sites and the scale of development identified in the Local Plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable (Framework paragraph 173).

Question 4 – At the heart of the NPPF there is a presumption in favour of sustainable development which should be seen as a golden thread running through both plan making and decision taking. Reference Paragraphs 14 & 15 of the NPPF. To be sound a Development Plan documents must be positively prepared, justified, effective, and consistent with national planning policy. To be ‘positively prepared’ the Development Plan should be prepared based on a strategy which seeks to meet objectively assessed development. To be ‘justified’ the Plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. To be ‘effective’ the Plan should be deliverable over its period and based on effective joint working. To be ‘consistent with national planning policy’ the Plan should enable the delivery of sustainable development in accordance with the policies contained within the Framework.