



VALP Proposed Main Modifications Consultation

RESPONSE FORM

Gardner Planning Ltd
on behalf of AWE Ltd



For internal Use only	ID:		Rep No:	

VALP Proposed Main Modifications Consultation

RESPONSE FORM

Responses are encouraged via the Council's online consultation system available on the website, see <https://aylesburyvaledc.jdi-consult.net/localplan>. However, this form can be returned via email to localplanconsult@aylesburyvaledc.gov.uk or in hard copy if necessary to:

Planning Policy, Aylesbury Vale District Council, The Gateway, Gatehouse Road, Aylesbury, Bucks, HP19 8FF

The consultation runs from 12pm Tuesday 5 November until 5.15pm Tuesday 17 December

This form has two parts:

Part A - Personal Details and Part B - Your comments

PART A

1. Personal Details

Title	<input type="text"/>
First Name	<input type="text"/>
Last Name	<input type="text"/>
Organisation (Where relevant)	<input type="text" value="Arnold White Estates Ltd"/>
Address Line 1	<input type="text" value="Vimy Court"/>
Address Line 2	<input type="text" value="Vimy Road"/>
Address Line 3	<input type="text" value="Leighton Buzzard"/>
Post Code	<input type="text" value="LU7 1FG"/>
E-mail Address	<input type="text"/>
Telephone Number	<input type="text"/>

2. Agent's Details (if applicable)

Title	<input type="text" value="Mr"/>
First Name	<input type="text" value="Geoff"/>
Last Name	<input type="text" value="Gardner"/>
Organisation	<input type="text" value="Gardner Planning Ltd"/>
Address Line 1	<input type="text" value="Down Ampney"/>
Address Line 2	<input type="text" value="Bendlowes Road"/>
Address Line 3	<input type="text" value="Great Bardfield, Essex"/>
Post Code	<input type="text" value="CM7 4RR"/>
E-mail Address	<input type="text" value="geoff@gardnerplanning.com"/>
Telephone Number	<input type="text" value="07887 662166"/>

PART B

REPRESENTATION FORM

Please Note: You do not need to return this form if you have made the same comments via the council's online system for this consultation. Duplicates will not be considered.

Please specify which Proposed Main Modification, part of the Sustainability Appraisal addendum or Habitat Regulation Assessment your comments relate to. Any representations on the content of the new evidence published alongside the Proposed Main Modifications must also relate to a specified Main Modification to the VALP or they will not be accepted. If you wish to comment on more than one Modification please use a separate form for each.

e.g. MM001

MM001, 002, 003, 010

Do you support or object?

Support Object

Do you consider the Local Plan to be legally compliant?

Yes No

Do you consider the Local Plan to be sound?

Yes No

If you do NOT consider the Local Plan to be sound, please specify on what grounds:

Positively prepared Justified Effective Consistent with National Policy

Enter your full representation here:

The overall intention is to slightly increase the overall housing need figure for the District over the Plan period (2013 - 2033, 20 years) from 19,400 to 20,600, then add 8,000 for the unmet needs of adjoining Districts, without naming them in modified Policy S2, to give a total Plan requirement of 28,600. The modified Plan states that actual provision will be 30,233 (MM070). This approach was on the basis that the Plan would be swiftly reviewed, but that commitment has now been dropped (see comment on MM004, 008, 026 on a separate sheet), not least because AVDC is being abolished and a new Unitary Authority of Buckingham Council is being formed from April 2020.

However, without that commitment, the housing numbers now being put forward in the Plan are well below the updated NPPF requirement for the 'standard method'. For Aylesbury Vale In contrast, the ONS/DCLG household projections, were published in Table 406 in July 2016 based on the 2014-based sub-national population projections, provide different figures. The growth in households from 2013 to 2033 for Aylesbury Vale is 21,027 (July 2016), which equates to 21,834 extra homes (1,092 p.a.) by adding 3.84% to allow for vacancies etc. This is a difference of 2,434 homes in the plan period (or 13% higher than the HEDNA).

The new NPPF supports a "standard method" for calculating housing need which is detailed in the Planning Practice Guidance. This was first set out in 'Planning for the right homes in the right places: consultation proposals' (DCLG Sept 2017). This proposed an uplift to the household projections is based on affordability ratios. NPPF para 60 states that standard method should be applied "unless there are exceptional circumstances that justify an alternative approach".

An accompanying Table issued with the draft NPPF illustrated the affect for Local Authority areas. Aylesbury District would have a 'standard method' figure of **1,499 homes p.a.** which would require 29,980 new homes over the Plan period for the District alone (without any accommodation of unmet

need from elsewhere) in the Plan. Although their housing needs could also increase, leading to a higher unmet need figure to be accommodated in Aylesbury Vale, even assuming the 8,000 homes number of unmet need, **the comparative starting point figure for the Plan would be 47,980 homes** over the Plan period, not 28,600 so that even the higher provision of 30,233 homes is inadequate.

It may have been acceptable as a short-term expedient, based on the old NPPF, to restrict the numbers but with the promised 'early' Review in the original text (para 1.13, 3.15) now revised to 'within 5 years' in modified Policy S9 (MM026) the link between low numbers/early review has been broken.

If your representation is more than 100 words, please provide a summary under 100 words here:

The modified but low housing numbers in the Plan can only be justified if the Plan includes a commitment for an early review. That linkage is essential because the Plan has been prepared under NPPF 2012 which was allowed by Government as a 'stop-gap' measure. Full housing provision for the VALP would be some 48,000 homes over the Plan period using the 'standard method' so even the Plan is providing 30,233 homes that is some 18,000 homes short. The 'early review' commitment is now proposed for deletion so that Plan, based on the numbers now proposed, is unsound not being effective or consistent with national policy.

Please specify the changes you think are needed to be made to the proposed main modification. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.

As it stands the housing numbers are unsound. Either the 'early' Review is re-established (and the consequence of not doing so reflected in a new Policy) or the housing numbers and allocations should be increased significantly increased thus making the current version of the Plan unsound.

If the inspector decides further hearing sessions are needed would you wish to speak at these?

Yes No

If Yes - you wish to speak at any further hearings, please outline why you consider this to be necessary:

The issues raised in the submission would benefit from further discussion and interaction by participation at a Hearing, to best assist the Inspector.

Do you wish to be notified...

- When the Inspector's report is published?
- When the Vale of Aylesbury Local Plan is adopted?

**Vale of Aylesbury Local Plan: Responses should be returned to Aylesbury
Vale District Council by 5.15pm Tuesday 17 December 2019
(responses will not be accepted after this time)**



VALP Proposed Main Modifications Consultation

RESPONSE FORM

Gardner Planning Ltd
on behalf of AWE Ltd



For internal Use only	ID:		Rep No:	

VALP Proposed Main Modifications Consultation

RESPONSE FORM

Responses are encouraged via the Council's online consultation system available on the website, see <https://aylesburyvaledc.jdi-consult.net/localplan>. However, this form can be returned via email to localplanconsult@aylesburyvaledc.gov.uk or in hard copy if necessary to:

Planning Policy, Aylesbury Vale District Council, The Gateway, Gatehouse Road, Aylesbury, Bucks, HP19 8FF

The consultation runs from 12pm Tuesday 5 November until 5.15pm Tuesday 17 December

This form has two parts:

Part A - Personal Details and Part B - Your comments

PART A

1. Personal Details

Title	<input type="text"/>
First Name	<input type="text"/>
Last Name	<input type="text"/>
Organisation (Where relevant)	<input type="text" value="Arnold White Estates Ltd"/>
Address Line 1	<input type="text" value="Vimy Court"/>
Address Line 2	<input type="text" value="Vimy Road"/>
Address Line 3	<input type="text" value="Leighton Buzzard"/>
Post Code	<input type="text" value="LU7 1FG"/>
E-mail Address	<input type="text"/>
Telephone Number	<input type="text"/>

2. Agent's Details (if applicable)

Title	<input type="text" value="Mr"/>
First Name	<input type="text" value="Geoff"/>
Last Name	<input type="text" value="Gardner"/>
Organisation	<input type="text" value="Gardner Planning Ltd"/>
Address Line 1	<input type="text" value="Down Ampney"/>
Address Line 2	<input type="text" value="Bendlowes Road"/>
Address Line 3	<input type="text" value="Great Bardfield, Essex"/>
Post Code	<input type="text" value="CM7 4RR"/>
E-mail Address	<input type="text" value="geoff@gardnerplanning.com"/>
Telephone Number	<input type="text" value="07887 662166"/>

PART B

REPRESENTATION FORM

Please Note: You do not need to return this form if you have made the same comments via the council's online system for this consultation. Duplicates will not be considered.

Please specify which Proposed Main Modification, part of the Sustainability Appraisal addendum or Habitat Regulation Assessment your comments relate to. Any representations on the content of the new evidence published alongside the Proposed Main Modifications must also relate to a specified Main Modification to the VALP or they will not be accepted. If you wish to comment on more than one Modification please use a separate form for each.

e.g. MM001

MM004, 008, 026

Do you support or object?

Support Object

Do you consider the Local Plan to be legally compliant?

Yes No

Do you consider the Local Plan to be sound?

Yes No

If you do NOT consider the Local Plan to be sound, please specify on what grounds:

Positively prepared Justified Effective Consistent with National Policy

Enter your full representation here:

In response to overall housing numbers (MM001, 002, 003, 010) breaking the link between what are low housing numbers with the commitment for an 'early review' is unsound (NPPF 2012 para 182 'justified', 'consistent with national policy'). The words to be deleted from para 3.15 by MM008 '*However, we fully anticipate the need to carry out an early review.*' reveal that the critical link between low housing numbers and an early review has been broken. A Plan based on maintaining that link could only be sound if the Review was a commitment, not something to be done within 5 years (the fall-back national position at NPPF 2019 para 33). That timescale may be applicable to Plans which are based on the 'standard method' (NPPF 2019 para 60), but wholly inadequate for a Plan based on the old NPPF (March 2012).

The reason for this change is the administrative inconvenience of the abolition of AVDC and its replacement Buckinghamshire Council from April 2020. This is not significant reason to change 'early' to '5 years from adoption' (so probably 2025) especially when the original Plan (submitted 2 years ago) recognised the need for early review and its commitment to do it. It is likely that all the material that went into the Plan, and some of the key staff will be inherited by Buckingham Council.

If your representation is more than 100 words, please provide a summary under 100 words here:

In response to overall housing numbers (MM001, 002, 003, 010) breaking the link between what are low housing numbers with the commitment for an 'early review' is unsound (NPPF 2012 para 182 'justified', 'consistent with national policy').

A Plan based on maintaining that link could only be sound if the early Review was a commitment.

The reason for this change is the administrative inconvenience of the abolition of AVDC and its replacement Buckinghamshire Council from April 2020. This is not significant reason to change 'early' to '5 years from adoption'

Please specify the changes you think are needed to be made to the proposed main modification. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.

MM026, and consequent changes

The 'early review' commitment should be reintroduced into Policy S9 by the following amendment
Irrespective of the above criteria, the Plan will be urgently reviewed, not least to reflect the need for higher housing numbers to reach the stage of another Submitted Plan (currently Regulation 22) within 2 years of the adoption of this Plan.

If the inspector decides further hearing sessions are needed would you wish to speak at these?

Yes No

If Yes - you wish to speak at any further hearings, please outline why you consider this to be necessary:

The issues raised in the submission would benefit from further discussion and interaction by participation at a Hearing, to best assist the Inspector.

Do you wish to be notified...

When the Inspector's report is published?

When the Vale of Aylesbury Local Plan is adopted?

**Vale of Aylesbury Local Plan: Responses should be returned to Aylesbury Vale District Council by 5.15pm Tuesday 17 December 2019
(responses will not be accepted after this time)**



VALP Proposed Main Modifications Consultation

RESPONSE FORM

Gardner Planning Ltd
on behalf of AWE Ltd



For internal Use only	ID:		Rep No:	

VALP Proposed Main Modifications Consultation

RESPONSE FORM

Responses are encouraged via the Council's online consultation system available on the website, see <https://aylesburyvaledc.jdi-consult.net/localplan>. However, this form can be returned via email to localplanconsult@aylesburyvaledc.gov.uk or in hard copy if necessary to:

Planning Policy, Aylesbury Vale District Council, The Gateway, Gatehouse Road, Aylesbury, Bucks, HP19 8FF

The consultation runs from 12pm Tuesday 5 November until 5.15pm Tuesday 17 December

This form has two parts:

Part A - Personal Details and Part B - Your comments

PART A

1. Personal Details

Title	<input type="text"/>
First Name	<input type="text"/>
Last Name	<input type="text"/>
Organisation <i>(Where relevant)</i>	<input type="text" value="Arnold White Estates Ltd"/>
Address Line 1	<input type="text" value="Vimy Court"/>
Address Line 2	<input type="text" value="Vimy Road"/>
Address Line 3	<input type="text" value="Leighton Buzzard"/>
Post Code	<input type="text" value="LU7 1FG"/>
E-mail Address	<input type="text"/>
Telephone Number	<input type="text"/>

2. Agent's Details (if applicable)

Title	<input type="text" value="Mr"/>
First Name	<input type="text" value="Geoff"/>
Last Name	<input type="text" value="Gardner"/>
Organisation	<input type="text" value="Gardner Planning Ltd"/>
Address Line 1	<input type="text" value="Down Ampney"/>
Address Line 2	<input type="text" value="Bendlowes Road"/>
Address Line 3	<input type="text" value="Great Bardfield, Essex"/>
Post Code	<input type="text" value="CM7 4RR"/>
E-mail Address	<input type="text" value="geoff@gardnerplanning.com"/>
Telephone Number	<input type="text" value="07887 662166"/>

PART B

REPRESENTATION FORM

Please Note: You do not need to return this form if you have made the same comments via the council's online system for this consultation. Duplicates will not be considered.

Please specify which Proposed Main Modification, part of the Sustainability Appraisal addendum or Habitat Regulation Assessment your comments relate to. Any representations on the content of the new evidence published alongside the Proposed Main Modifications must also relate to a specified Main Modification to the VALP or they will not be accepted. If you wish to comment on more than one Modification please use a separate form for each.

e.g. MM001

MM025, paras 3.80, 3.83, 3.89, Tables 7, 9

Do you support or object?

Support Object

Do you consider the Local Plan to be legally compliant?

Yes No

Do you consider the Local Plan to be sound?

Yes No

If you do NOT consider the Local Plan to be sound, please specify on what grounds:

Positively prepared Justified Effective Consistent with National Policy

Enter your full representation here:

The following tables (7 and 9) are taken from the Plan as proposed to be modified.

Table 7 p62 Housing delivery in the plan period

	2013/4	2014/5	2015/6	2016/7	2017/8	2018/9
Annual requirement	1,430	1,430	1,430	1,430	1,430	1,430
Completions	990	1,419	1,191	1,323	1,414	1,443 projected
annual shortfall	-440	-11	-239	-107	-16	13
Cumulative shortfall	-440	-451	-690	-797	-813	-800

continued on separate sheet

Table 9 pp63/64 Housing land supply for 1st April 2018 to 31st March 2023

	Plan	GPL
VALP five year requirement 2018-2023	7,150	7,150
Pre-2018 under-supply*	271	813
Total five year requirement	7,421	7,963
Overall requirement 2018-2023 including 5% buffer	7,792	
Overall requirement 2018-2023 including 20% buffer		9,556
Supply of deliverable sites	8,536	8,536
10% non implementation deduction	-152	-152
Total projected supply from windfall sites	148	148
Overall supply with 10% non-implementation discount and windfall addition	8,532	8,532
Overall supply compared to requirement	740	-1,024
Overall supply % of requirement	109.50%	89.3%
Overall years supply	5.47 years	4.46 years

The additional column 'GPL' in bold shows the correct calculation because:

- The shortfall of pre March 2018 is 813 homes not 271
- Completions in years 2013/4 to 2017/8 have all been less than the required target. This represents 'persistent under-delivery' such that a buffer of 20% must be applied NPPF 2019 para 73 c) and NPPF 2012 para 47 pt 2. The 5% buffer in the modified Plan is not applicable.
- Thus with these 2 factors corrected, the requirement is 9,556 and supply is (as in the Plan's Table 9) 8,536 which is 89.3% not 109.5% so that in terms of the 5-year period there is a 4.46 years supply not 5.47 years, and a shortfall of 1,024 homes (not a surplus of 740).

There is no justification in the Plan for using the 'Liverpool method' of spreading the shortfall over the remaining plan period, rather than the more common 'Sedgefield method' of accommodating the shortfall within the 5-year period. Reference is made to the ED213 Housing Land Supply Soundness document 27 July 2019 (i.e. produced well after the Hearings) which justifies use of the 'Liverpool method' because the Plan includes 'large sites' and this method was accepted in South Cambridgeshire. One example is not enough to justify the 'Liverpool method'. Another examples is the adjoining Authority Milton Keynes: *'This approach is commonly referred to as the "Sedgefield" approach and is recommended (but not required) in the PPG (044 Reference ID: 3-044-20180913). The approach was also agreed for use by the Council at the examination of Plan:MK to deal with any shortfall'* (Milton Keynes Council Assessment of Five Year Housing Land Supply 2019/20 - 2023/24 June 2019, para 2.5)

That PPG reference has been superseded by Paragraph: 031 Reference ID: 68-031-20190722, Revision date: 22 July 2019, which includes:

The level of deficit or shortfall will need to be calculated from the base date of the adopted plan and should be added to the plan requirements for the next 5 year period (the Sedgefield approach), then the appropriate buffer should be applied. If a strategic policy-making authority wishes to deal with past under delivery over a longer period, then a case may be made as part of the plan-making and examination process rather than on a case by case basis on appeal.

Clearly, the Government through the PPG requires that the Sedgefield method of making up the shortfall within 5 years must be used.

There was no discussion about Liverpool or Sedgefield at the Hearing (Matter 2f) and there is nothing in the Inspector's interim report about it.

That said, use of the Liverpool method (shortfall 271) rather than Sedgefield (813) makes very little difference to the 5-year calculation which is still under the required 5 years.

The importance of the deficiency in the 5YHLS is that even on the Plan's projected delivery (which "includes all sources of new housing in the district during those years - sites with unimplemented planning permission, sites that have been approved subject to a S106 agreement, made neighbourhood plan allocations, sites approved via notification to come forward under permitted development rights, proposed allocations in VALP and sites with extra care units") there is shortfall in allocations that will provide a 5-year supply for 2018/19 to 2022/23.

Plans must provide sufficient allocations of new sites which, when added to existing commitments, provide the means for a 5-year housing land supply at the outset. This shortfall of 1,024 homes should be made up by allocating additional sites. It would not be a sound plan as it stands, failing NPPF 2012 para 182 (NPPF 2019 para 35) tests of soundness 'positively prepared' and 'consistent with national policy'.

If your representation is more than 100 words, please provide a summary under 100 words here:

The calculation of the 5-year Housing Land Supply shown in Table 9 is incorrect because:

- Past completions in the Plan period have all been 'persistent under delivery' so that a buffer of 20% should be applied.
- The 'Liverpool method' is inappropriate PPG 031 Reference ID: 68-031-20190722, requires the 'Sedgefield method'

The Modification to Table 9 shows that the supply is 4.46 years, thus the Plan is unsound not being 'justified' or 'consistent with national policy'.

Please specify the changes you think are needed to be made to the proposed main modification. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.

Table 9 pp63/64 Housing land supply for 1st April 2018 to 31st March 2023 should be as follows

continued on a separate sheet

VALP five year requirement 2018-2023	7,150	7,150
Pre-2018 under-supply*	271	813
Total five year requirement	7,421	7,963
Overall requirement 2018-2023 including 5% buffer	7,792	
Overall requirement 2018-2023 including 20% buffer	-	9,556
Supply of deliverable sites	8,536	8,536
10% non implementation deduction	-152	-152
Total projected supply from windfall sites	148	148
Overall supply with 10% non-implementation discount and windfall addition	8,532	8,532
Overall supply compared to requirement	740	-1,024
Overall supply % of requirement	109.50%	89.3%
Overall years supply	5.47 years	4.46 years

The new paragraph 3.89 shown in the modified Plan is important but is not listed as a main modification, it should be, although there are Modifications which make reference to the 5-Year Housing Land Supply (5YHLS) e.g. MM023- 025, paras 3.78 - 3.80.

Paragraph 3.89 in the Plan (in its current modified form) would more accurately be as follows (in bold):

Table 9 **needs to** demonstrates that, based on the housing trajectory at Appendix A, **the plan that a sufficient 5-year housing land supply can be provided. Currently it fails to do that. It must** identify a supply of specific deliverable sites **which are** sufficient to provide five years' worth of housing against its housing requirements with an **adequate** additional buffer (moved forward from later in the plan period) to ensure choice and competition in the market for land. This includes all sources of new housing in the district during those years - sites with unimplemented planning permission, sites that have been approved subject to a S106 agreement, made neighbourhood plan allocations, sites approved via notification to come forward under permitted development rights, proposed allocations in VALP and sites with extra care units. This supply figure for the five year period then has a 10% non implementation

deduction to small sites (under five) and sites earlier in the planning process and the allowance for windfall sites is added on. It is then compared to the 5 year housing requirement figure, which is adjusted for the previous undersupply during the plan period (as shown as **813 at March 2018** in table 7) and has the **20 5%** buffer applied **because there was 'persistent under delivery' in the each of the years 2013/4 to 2017/8. To comply with PPG Paragraph: 031 Reference ID: 68-031-20190722** ¶this undersupply **must be** is **accommodated within the next 5-year period in accordance with the Sedgefield method.** ~~spread across the rest of the plan period, using the Liverpool method, which is explained further in the Housing Land Supply Soundness document July 2019.~~

If the inspector decides further hearing sessions are needed would you wish to speak at these?

Yes No

If Yes - you wish to speak at any further hearings, please outline why you consider this to be necessary:

The issues raised in the submission would benefit from further discussion and interaction by participation at a Hearing, to best assist the Inspector.

Do you wish to be notified...

- When the Inspector's report is published?
- When the Vale of Aylesbury Local Plan is adopted?

**Vale of Aylesbury Local Plan: Responses should be returned to Aylesbury
Vale District Council by 5.15pm Tuesday 17 December 2019
(responses will not be accepted after this time)**



VALP Proposed Main Modifications Consultation

RESPONSE FORM

Gardner Planning Ltd
on behalf of AWE Ltd



For internal Use only	ID:		Rep No:	

VALP Proposed Main Modifications Consultation

RESPONSE FORM

Responses are encouraged via the Council's online consultation system available on the website, see <https://aylesburyvaledc.jdi-consult.net/localplan>. However, this form can be returned via email to localplanconsult@aylesburyvaledc.gov.uk or in hard copy if necessary to:

Planning Policy, Aylesbury Vale District Council, The Gateway, Gatehouse Road, Aylesbury, Bucks, HP19 8FF

The consultation runs from 12pm Tuesday 5 November until 5.15pm Tuesday 17 December

This form has two parts:

Part A - Personal Details and Part B - Your comments

PART A

1. Personal Details

Title	<input type="text"/>
First Name	<input type="text"/>
Last Name	<input type="text"/>
Organisation <i>(Where relevant)</i>	<input type="text" value="Arnold White Estates Ltd"/>
Address Line 1	<input type="text" value="Vimy Court"/>
Address Line 2	<input type="text" value="Vimy Road"/>
Address Line 3	<input type="text" value="Leighton Buzzard"/>
Post Code	<input type="text" value="LU7 1FG"/>
E-mail Address	<input type="text"/>
Telephone Number	<input type="text"/>

2. Agent's Details (if applicable)

Title	<input type="text" value="Mr"/>
First Name	<input type="text" value="Geoff"/>
Last Name	<input type="text" value="Gardner"/>
Organisation	<input type="text" value="Gardner Planning Ltd"/>
Address Line 1	<input type="text" value="Down Ampney"/>
Address Line 2	<input type="text" value="Bendlowes Road"/>
Address Line 3	<input type="text" value="Great Bardfield, Essex"/>
Post Code	<input type="text" value="CM7 4RR"/>
E-mail Address	<input type="text" value="geoff@gardnerplanning.com"/>
Telephone Number	<input type="text" value="07887 662166"/>

PART B

REPRESENTATION FORM

Please Note: You do not need to return this form if you have made the same comments via the council's online system for this consultation. Duplicates will not be considered.

Please specify which Proposed Main Modification, part of the Sustainability Appraisal addendum or Habitat Regulation Assessment your comments relate to. Any representations on the content of the new evidence published alongside the Proposed Main Modifications must also relate to a specified Main Modification to the VALP or they will not be accepted. If you wish to comment on more than one Modification please use a separate form for each.

e.g. MM001

MM011, 012

Do you support or object?

Support Object

Do you consider the Local Plan to be legally compliant?

Yes No

Do you consider the Local Plan to be sound?

Yes No

If you do NOT consider the Local Plan to be sound, please specify on what grounds:

Positively prepared Justified Effective Consistent with National Policy

Enter your full representation here:

MM011

Table 1 in the Plan as modified sets out the spatial strategy making total development in the District of 30,233 homes. The Aylesbury share of that is 55%, the 'large villages' accommodate 7.5%. This is a huge imbalance

Table 2 (MM012) identifies the 'Larger Villages' with the description:

Larger, more sustainable villages that have at least reasonable access to facilities and services and public transport, making them sustainable locations for development. The plan allocates sites at some of the larger villages.

Waddesdon is one such 'large village' with extensive services, facilities, a major tourist attraction (Waddesdon Manor) and a major employment site close by. It is close to the line of HS2, for which construction traffic access is proposed in the vicinity, and straddles the busy A41. The need for a more dispersed pattern of development in the 'rural areas' would be served at the site north of Waddesdon. AWEL has proposals for some 600 homes which would facilitate a permanent bypass (and temporary HS2 access), provide a new village green and facilitate a reinvigorated village centre no longer suffering from through traffic.

Because of the over-emphasis on Aylesbury, the 'large villages' are effectively ignored despite their importance recognised in Table 2.

If your representation is more than 100 words, please provide a summary under 100 words here:

The spatial strategy distribution as expressed in MM011, 012 demonstrates a huge imbalance. The Aylesbury share of that is 55%, the 'large villages' accommodate 7.5%. Waddesdon is one such 'large village' with extensive services, facilities, a major tourist attraction (Waddesdon Manor) and a major employment site close by. The need for a more dispersed pattern of development would be served at the site north of Waddesdon which has been master-planned.

Please specify the changes you think are needed to be made to the proposed main modification. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.

Encourage a wider dispersal of development in the larger village rural settlements, giving Waddesdon as an example.

If the inspector decides further hearing sessions are needed would you wish to speak at these?

Yes No

If Yes - you wish to speak at any further hearings, please outline why you consider this to be necessary:

The issues raised in the submission would benefit from further discussion and interaction by participation at a Hearing, to best assist the Inspector.

Do you wish to be notified...

- When the Inspector's report is published?
 When the Vale of Aylesbury Local Plan is adopted?

**Vale of Aylesbury Local Plan: Responses should be returned to Aylesbury Vale District Council by 5.15pm Tuesday 17 December 2019
(responses will not be accepted after this time)**



VALP Proposed Main Modifications Consultation

RESPONSE FORM

Gardner Planning Ltd
on behalf of AWE Ltd



For internal Use only	ID:		Rep No:	

VALP Proposed Main Modifications Consultation

RESPONSE FORM

Responses are encouraged via the Council's online consultation system available on the website, see <https://aylesburyvaledc.jdi-consult.net/localplan>. However, this form can be returned via email to localplanconsult@aylesburyvaledc.gov.uk or in hard copy if necessary to:

Planning Policy, Aylesbury Vale District Council, The Gateway, Gatehouse Road, Aylesbury, Bucks, HP19 8FF

The consultation runs from 12pm Tuesday 5 November until 5.15pm Tuesday 17 December

This form has two parts:

Part A - Personal Details and Part B - Your comments

PART A

1. Personal Details

Title	<input type="text"/>
First Name	<input type="text"/>
Last Name	<input type="text"/>
Organisation (Where relevant)	<input type="text" value="Arnold White Estates Ltd"/>
Address Line 1	<input type="text" value="Vimy Court"/>
Address Line 2	<input type="text" value="Vimy Road"/>
Address Line 3	<input type="text" value="Leighton Buzzard"/>
Post Code	<input type="text" value="LU7 1FG"/>
E-mail Address	<input type="text"/>
Telephone Number	<input type="text"/>

2. Agent's Details (if applicable)

Title	<input type="text" value="Mr"/>
First Name	<input type="text" value="Geoff"/>
Last Name	<input type="text" value="Gardner"/>
Organisation	<input type="text" value="Gardner Planning Ltd"/>
Address Line 1	<input type="text" value="Down Ampney"/>
Address Line 2	<input type="text" value="Bendlowes Road"/>
Address Line 3	<input type="text" value="Great Bardfield, Essex"/>
Post Code	<input type="text" value="CM7 4RR"/>
E-mail Address	<input type="text" value="geoff@gardnerplanning.com"/>
Telephone Number	<input type="text" value="07887 662166"/>

PART B

REPRESENTATION FORM

Please Note: You do not need to return this form if you have made the same comments via the council's online system for this consultation. Duplicates will not be considered.

Please specify which Proposed Main Modification, part of the Sustainability Appraisal addendum or Habitat Regulation Assessment your comments relate to. Any representations on the content of the new evidence published alongside the Proposed Main Modifications must also relate to a specified Main Modification to the VALP or they will not be accepted. If you wish to comment on more than one Modification please use a separate form for each.

e.g. MM001

MM070, 080

Do you support or object?

Support Object

Do you consider the Local Plan to be legally compliant?

Yes No

Do you consider the Local Plan to be sound?

Yes No

If you do NOT consider the Local Plan to be sound, please specify on what grounds:

Positively prepared Justified Effective Consistent with National Policy

Enter your full representation here:

MM070 There is a new Policy D2 'Delivering site allocations in the rest of the district' on p124 of the modified Plan. MM080 This refers also to a different Policy D2 which is actually Policy D3 in the Modified Plan.

The apparent exclusion of 'agricultural buildings' from being converted (or developed) to residential is contrary to the GDPO Class Q (15.4.15) which allows conversion up to 5 units in former agricultural buildings.

If your representation is more than 100 words, please provide a summary under 100 words here:

Please specify the changes you think are needed to be made to the proposed main modification. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.

D3 Proposals for non-allocated sites at strategic settlements, larger villages and medium villages

The * qualifying c. should read

*The existing developed footprint is defined as the continuous built form of the village, and **generally** excludes **remote** individual buildings and groups of dispersed buildings. The exclusion covers former agricultural barns that have been converted, agricultural buildings (**but does not preclude permitted development for converting agricultural buildings to residential - GDPO Class Q 15.4.15**) and associated land on the edge of the village and gardens, paddocks and other undeveloped land within the curtilage of buildings on the edge of the settlement where the land relates more to the surrounding countryside than to the built-up area of the village.

If the inspector decides further hearing sessions are needed would you wish to speak at these?

Yes No

If Yes - you wish to speak at any further hearings, please outline why you consider this to be necessary:

The issues raised in the submission would benefit from further discussion and interaction by participation at a Hearing, to best assist the Inspector.

Do you wish to be notified...

- When the Inspector's report is published?
- When the Vale of Aylesbury Local Plan is adopted?

**Vale of Aylesbury Local Plan: Responses should be returned to Aylesbury
Vale District Council by 5.15pm Tuesday 17 December 2019
(responses will not be accepted after this time)**



VALP Proposed Main Modifications Consultation

RESPONSE FORM

Gardner Planning Ltd
on behalf of AWE Ltd



For internal Use only	ID:		Rep No:	

VALP Proposed Main Modifications Consultation

RESPONSE FORM

Responses are encouraged via the Council's online consultation system available on the website, see <https://aylesburyvaledc.jdi-consult.net/localplan>. However, this form can be returned via email to localplanconsult@aylesburyvaledc.gov.uk or in hard copy if necessary to:

Planning Policy, Aylesbury Vale District Council, The Gateway, Gatehouse Road, Aylesbury, Bucks, HP19 8FF

The consultation runs from 12pm Tuesday 5 November until 5.15pm Tuesday 17 December

This form has two parts:

Part A - Personal Details and Part B - Your comments

PART A

1. Personal Details

Title	<input type="text"/>
First Name	<input type="text"/>
Last Name	<input type="text"/>
Organisation (Where relevant)	<input type="text" value="Arnold White Estates Ltd"/>
Address Line 1	<input type="text" value="Vimy Court"/>
Address Line 2	<input type="text" value="Vimy Road"/>
Address Line 3	<input type="text" value="Leighton Buzzard"/>
Post Code	<input type="text" value="LU7 1FG"/>
E-mail Address	<input type="text"/>
Telephone Number	<input type="text"/>

2. Agent's Details (if applicable)

Title	<input type="text" value="Mr"/>
First Name	<input type="text" value="Geoff"/>
Last Name	<input type="text" value="Gardner"/>
Organisation	<input type="text" value="Gardner Planning Ltd"/>
Address Line 1	<input type="text" value="Down Ampney"/>
Address Line 2	<input type="text" value="Bendlowes Road"/>
Address Line 3	<input type="text" value="Great Bardfield, Essex"/>
Post Code	<input type="text" value="CM7 4RR"/>
E-mail Address	<input type="text" value="geoff@gardnerplanning.com"/>
Telephone Number	<input type="text" value="07887 662166"/>

PART B

REPRESENTATION FORM

Please Note: You do not need to return this form if you have made the same comments via the council's online system for this consultation. Duplicates will not be considered.

Please specify which Proposed Main Modification, part of the Sustainability Appraisal addendum or Habitat Regulation Assessment your comments relate to. Any representations on the content of the new evidence published alongside the Proposed Main Modifications must also relate to a specified Main Modification to the VALP or they will not be accepted. If you wish to comment on more than one Modification please use a separate form for each.

e.g. MM001

MM032, 033, 035

Do you support or object?

Support Object

Do you consider the Local Plan to be legally compliant?

Yes No

Do you consider the Local Plan to be sound?

Yes No

If you do NOT consider the Local Plan to be sound, please specify on what grounds:

Positively prepared Justified Effective Consistent with National Policy

Enter your full representation here:

MM033 states that delivery for the majority of the dwellings on the site, at least 875 dwellings (at least 1,000 less the 125 permitted), *'is to come forward in the later years of the plan between 2024 and 2033, as it is dependent on the delivery of infrastructure related to the development of HS2.'* This should be incorporated in Policy.

MM032: It is clear that the dual carriageway between the B4443 and A413 South West Link Road is essential infrastructure that must be available before the development of D-AGT1 South Aylesbury, but it is unclear whether it can be delivered. There is in para 4.35 that the access road 'must' be provided, but MM035 c. of the Policy this is changed to 'prioritising'.

There is therefore vagueness about whether the essential infrastructure can be provided and when, which casts would cast doubt on the site's contribution to housing needs. If the site is to be included in the Plan then provision of essential infrastructure should be made a requirement in the Policy.

If your representation is more than 100 words, please provide a summary under 100 words here:

There is therefore vagueness about whether the essential infrastructure can be provided for AGT1 S Aylesbury and when, which casts doubt on the site's contribution to housing needs. If the site is to be included in the Plan then provision of essential infrastructure should be made a requirement in the Policy.

Please specify the changes you think are needed to be made to the proposed main modification. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.

D-AGT1 a. should be added to as follows: Provision of land for around at least 1,000 dwellings at a density that takes account of the adjacent settlement character and identity, integrates new development with the existing built area of Aylesbury and responds positively to the best characteristics of the surrounding area. **Should it become clear by 2025 that the pre-requisite HS2 infrastructure will not be available to serve the remaining 875 dwellings of the allocation then the LPA will assume that this development will not be delivered within the plan period and seek alternatives.**

D-AGT1 c. should be worded 'No development shall commence until the dual carriageway distributor road between B4443 Lower Road and A413 Wendover Road, to cross the railway line, is available. No vehicular access to or from the South East Aylesbury Link Road (SEALR) will be permitted to serve the development parcels.

MM033 para 4.35 should be worded: The 125 permitted dwellings are expected to be delivered between 2019 and 2022. The remainder of the site is **expected** to come forward in the later years of the plan between 2024 and 2033, as it is dependent on the delivery of infrastructure related to the development of HS2. **The Policy makes it clear that if by 2025 the pre-requisite HS2 infrastructure will not be available to serve the remaining 875 dwellings of the allocation then the LPA will assume that this development will not be delivered within the plan period and seek alternatives.** The AGT1 Masterplan SPD will provide further guidance and information on phasing expected time of delivery.

If the inspector decides further hearing sessions are needed would you wish to speak at these?

Yes No

If Yes - you wish to speak at any further hearings, please outline why you consider this to be necessary:

The issues raised in the submission would benefit from further discussion and interaction by participation at a Hearing, to best assist the Inspector.

Do you wish to be notified...

- When the Inspector's report is published?
- When the Vale of Aylesbury Local Plan is adopted?

**Vale of Aylesbury Local Plan: Responses should be returned to Aylesbury
Vale District Council by 5.15pm Tuesday 17 December 2019
(responses will not be accepted after this time)**



VALP Proposed Main Modifications Consultation

RESPONSE FORM

Gardner Planning Ltd
on behalf of AWE Ltd



For internal Use only	ID:		Rep No:	

VALP Proposed Main Modifications Consultation

RESPONSE FORM

Responses are encouraged via the Council's online consultation system available on the website, see <https://aylesburyvaledc.jdi-consult.net/localplan>. However, this form can be returned via email to localplanconsult@aylesburyvaledc.gov.uk or in hard copy if necessary to:

Planning Policy, Aylesbury Vale District Council, The Gateway, Gatehouse Road, Aylesbury, Bucks, HP19 8FF

The consultation runs from 12pm Tuesday 5 November until 5.15pm Tuesday 17 December

This form has two parts:

Part A - Personal Details and Part B - Your comments

PART A

1. Personal Details

Title	<input type="text"/>
First Name	<input type="text"/>
Last Name	<input type="text"/>
Organisation <i>(Where relevant)</i>	<input type="text" value="Arnold White Estates Ltd"/>
Address Line 1	<input type="text" value="Vimy Court"/>
Address Line 2	<input type="text" value="Vimy Road"/>
Address Line 3	<input type="text" value="Leighton Buzzard"/>
Post Code	<input type="text" value="LU7 1FG"/>
E-mail Address	<input type="text"/>
Telephone Number	<input type="text"/>

2. Agent's Details (if applicable)

Title	<input type="text" value="Mr"/>
First Name	<input type="text" value="Geoff"/>
Last Name	<input type="text" value="Gardner"/>
Organisation	<input type="text" value="Gardner Planning Ltd"/>
Address Line 1	<input type="text" value="Down Ampney"/>
Address Line 2	<input type="text" value="Bendlowes Road"/>
Address Line 3	<input type="text" value="Great Bardfield, Essex"/>
Post Code	<input type="text" value="CM7 4RR"/>
E-mail Address	<input type="text" value="geoff@gardnerplanning.com"/>
Telephone Number	<input type="text" value="07887 662166"/>

PART B

REPRESENTATION FORM

Please Note: You do not need to return this form if you have made the same comments via the council's online system for this consultation. Duplicates will not be considered.

Please specify which Proposed Main Modification, part of the Sustainability Appraisal addendum or Habitat Regulation Assessment your comments relate to. Any representations on the content of the new evidence published alongside the Proposed Main Modifications must also relate to a specified Main Modification to the VALP or they will not be accepted. If you wish to comment on more than one Modification please use a separate form for each.

e.g. MM001

MM041

Do you support or object?

Support Object

Do you consider the Local Plan to be legally compliant?

Yes No

Do you consider the Local Plan to be sound?

Yes No

If you do NOT consider the Local Plan to be sound, please specify on what grounds:

Positively prepared Justified Effective Consistent with National Policy

Enter your full representation here:

It is not clear whether the South West Link Road is an optional extra or whether it is essential infrastructure that must be available before the development of S-AGT2 South West Aylesbury can commence. It is not clear whether the Link Road can be delivered as part of the scheme, thus casting doubt on the site's contribution to housing needs (at least 1,590 dwellings). If the site allocation is proceed then there should be an amendment to the Policy to ensure that the South West Link Road is available before development commences.

If your representation is more than 100 words, please provide a summary under 100 words here:

Please specify the changes you think are needed to be made to the proposed main modification. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.

AGT2 b. should therefore be worded '**No development shall take place on D-AGT2 until the South West Link Road is available (the scheme will also enable its delivery), which will relieve traffic pressures in the town centre and enabling easier vehicular movement around Aylesbury.**'

If the inspector decides further hearing sessions are needed would you wish to speak at these?

Yes No

If Yes - you wish to speak at any further hearings, please outline why you consider this to be necessary:

The issues raised in the submission would benefit from further discussion and interaction by participation at a Hearing, to best assist the Inspector.

Do you wish to be notified...

- When the Inspector's report is published?
- When the Vale of Aylesbury Local Plan is adopted?

**Vale of Aylesbury Local Plan: Responses should be returned to Aylesbury
Vale District Council by 5.15pm Tuesday 17 December 2019
(responses will not be accepted after this time)**