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Via Email

17th December 2019

Dear Sir/Madam,

**VALP Examination – Main Modifications Consultation
Defence Infrastructure Organisation | RAF Halton**

JLL are writing on behalf of the Defence Infrastructure Organisation ('DIO') to formally comment on the VALP Examination Main Modifications Consultation, in respect of RAF Halton (D-HAL003).

RAF Halton was identified for closure on 6th September 2016 as part of the Ministry of Defence ('MOD') and DIO '*A Better Defence Estate*' programme.

In February 2019, Defence provided an update to Parliament on its progress to modernise its estate to meet future military capability requirements. The update provided clarity for the next five years of activity with details on the status of 33 sites.

The Defence Estate Optimisation Portfolio delivering this work is an ambitious 25-year portfolio of construction activity, unit and personnel moves, and site disposals that will deliver a better structured, more economical estate that more effectively supports military capability. In total, Defence will invest £4billion over the coming years, and has already released 12 sites as surplus to requirements.

As part of the recent announcement in parliament, the disposal date for RAF Halton was updated to provide for a phased vacation and development of RAF Halton from 2022 with a final vacation and disposal by 2025.

As the above update on the Defence Estate Optimisation Portfolio has become available since the proposed submission version of the VALP was first published, our principle comment on the Proposed Modifications is to ensure consistency across the document when referring to the phased commencement and final vacation and disposal dates.

We also wish to comment on the proposed heritage wording in relation to RAF Halton, to ensure that it is consistent with both the Planning (Listed Buildings and Conservation Areas) Act 1990 and the National Planning Policy Framework (NPPF). In respect of examination change reference AM087, the previous and proposed wording makes no distinction between the treatment of designated and non-designated heritage assets. This is not in compliance with the statutory duty or the NPPF which apply different requirements to these asset types, and therefore we consider that this policy is unsound.

In respect of listed buildings, the statutory duty sets out that special regard should be given to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. There is no statutory requirement to enhance special interest. Whilst the NPPF advises that account should be taken of the desirability of sustaining and enhancing the significance of heritage assets, there is an allowance for harm to arise in some cases, albeit that it must be outweighed by public benefits associated with the development. The statement within the existing draft wording which states that *'the site outline includes a number of listed barrack blocks, and other designated and non-designated heritage assets that will need to be conserved and enhanced in any redevelopment'*, conflicts with this allowance. As such, we have prepared revised wording in consultation with the Conservation Officer which addresses these issues.

The table below sets out the suggested changes to the VALP wording in respect of the RAF Halton site and our corresponding comments on the proposed wording, with replacement wording suggested where necessary.

Examination Change Reference	Suggested Change (deleted text shown as struck through , additions of text <u>underlined</u> and specified modifications in <i>italics</i>)	Comment
MM004	The overall strategy adopted by this council to meet housing need is to direct sustainable levels of development to existing settlements, through the implementation of a capacity-based approach. Local Plan site allocations are made on the basis of whether a site is suitable and in a sustainable location, rather than applying a blanket housing percentage based on settlement size. More than half of the new homes planned for the district are to go in Aylesbury. The Council anticipates these will be delivered in a way that is in line with the town's Garden Town status. Some new homes are expected to be delivered at RAF Halton once the site closes. The Plan recognises that in the longer term, beyond the Plan period, a new settlement may be needed. This is to be considered as part of an early review. Important factors within the delivery of new housing will be to meet the needs for particular types of housing. The Plan makes specific provision for affordable housing given the high cost of housing in the district and to meet specialist needs such as housing for the elderly and for people with disabilities and special needs. The Council also has to meet Traveller needs and has updated a joint survey of Traveller need with other councils in Buckinghamshire.	N/A
MM010	The Vale of Aylesbury Local Plan will make provision for the delivery of the following in the period to 2033: This is made up of:	The final vacation and disposal date for RAF Halton is 2025.

	<ul style="list-style-type: none"> • A total of <u>at least 27,400</u> 28,600 new homes in accordance with the spatial distribution set out below and in Table 1. • 19,400 homes to meet the needs of Aylesbury Vale District • 2,250 homes to meet the needs of Wycombe District • 5,750 homes to meet the needs of Chiltern/South Bucks Districts • Provision for the identified need of <u>at least</u> 27 hectares of employment land and additional provision of some employment land to contribute to the employment needs of the wider economic market area. • Retail convenience floor space of <u>at least</u> 7,337 sqm³ and comparison floor space of <u>at least</u> 29,289 sqm⁴. • Associated infrastructure to support the above. <p>The primary focus of strategic levels of growth and investment will be at Aylesbury, and development at Buckingham, Winslow, Wendover and Haddenham supported by growth at other larger, medium and smaller villages. The strategy also allocates growth at a site adjacent to Milton Keynes which reflects its status as a strategic settlement immediately adjacent to Aylesbury Vale District. The spatial distribution will be as set out below.</p> <p>Strategic growth and investment will be concentrated in sustainable locations as follows:</p> <ol style="list-style-type: none"> a. Aylesbury Garden Town (comprising Aylesbury town and adjacent parts of surrounding parishes), will grow by 16,398 <u>16,586</u> new homes. It will be planned and developed drawing on Garden City principles which are set out in the Aylesbury Garden Town section, with high quality place-making and urban design principles at the core. This development will seek to support the revitalisation of the town centre. New housing will be delivered through existing commitments, including Berryfields and Kingsbrook, and complemented by other sustainable extensions and smaller scale development within the existing urban area. New homes to support economic growth will be accommodated through the effective use of previously developed land or sustainable greenfield urban fringe sites. These sites will provide or support delivery of identified strategic infrastructure requirements, and sustainable transport enhancements and make connections to strategic green infrastructure and the Vale's enterprise zones. b. Buckingham will accommodate growth of 2,359 <u>2,166</u> new homes. This, growth will enhance the town centre and its function as a market town, and will support sustainable economic growth in the north of the district. c. Haddenham will accommodate growth of 1,051 <u>1,032</u> new homes. This will be supported by infrastructure and recognise the important role of Haddenham and Thame railway station. d. Winslow will accommodate growth of 1,166 <u>897</u> new homes, linked with the development of East-West Rail and the new railway station in Winslow. 	
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	<p>e. Wendover will accommodate around 1,128<u>1,132</u> new homes with 1,000 new homes at Halton Camp which is now confirmed to be closing in 2022 recognising the sustainability of Wendover and the railway station. No further growth is allocated at Wendover reflecting the environmental constraints of the surrounding AONB and Green Belt land.</p> <p>f. Land within in the north east of Aylesbury Vale adjacent to Milton Keynes will make provision for 2,212<u>3,362</u> on a number of sites.</p> <p>g. At larger villages, listed in Policy S3, housing growth of 1,963<u>2,271</u> will be at a scale in keeping with the local character This will help meet identified needs for investment in housing and improve the range and type of employment opportunities across the district.</p> <p>h. At medium villages, listed in Policy S3, there will be housing growth of 1,095<u>1,282</u> at a scale in keeping with the local character and setting. This growth will be encouraged to help meet local housing and employment needs and to support the provision of services to the wider area.</p> <p>i. At smaller villages, listed in Policy S3, there will be more limited housing growth coming forward through either 'windfall' applications or neighbourhood plan allocations rather than allocations in this Plan.</p> <p>j. Elsewhere in rural areas, housing development will be strictly limited. This is likely to be incremental infill development and should be principally in line with Policy D4 and other relevant policies in the Plan.</p>	
MM016	<p>At the draft plan stage the Council<u>council</u> had also proposed two potential revisions to the boundary of the Green Belt to the north of Wendover. One revision was to provide a site for approximately 800 dwellings to the north of Wendover with the Green Belt removal potentially justified on the basis that there was very little capacity identified without this and another to remove part of RAF Halton as it is built up and has an urbanising effect within the Green Belt. Since then there has been an announcement that RAF Halton is to close by 20262 and an estimation for the amount of housing this site could deliver has been included in this plan in Policy D-HAL003. Because of the proximity of RAF Halton to Wendover it is considered that the justification for the site north of Wendover to provide 800 dwellings no longer exists as the capacity for housing in the area has significantly increased. Whilst <u>there are</u> arguments for releasing the RAF Halton site still remain, because of the change in circumstances and the future work to be done around how the site is developed after its closure, it is considered premature to define the boundary of the site to be released <u>the site</u> from the Green Belt. This boundary will be defined in a future Local Plan review.</p>	The final vacation and disposal date for RAF Halton is 2025.
MM070	<p><u>Delivering site allocations in the rest of the district</u></p> <p><u>In order to fulfil the level of growth for Aylesbury Vale set out in policy S2 Spatial Strategy for Growth, sites have also been allocated at other settlements in the district as well as at Aylesbury Garden Town. Allocating sites in the Local Plan allows growth to be located in the most suitable sites in the most sustainable locations by taking into account, through further assessment</u></p>	The final vacation and disposal date for RAF Halton is 2025.

	<p><u>beyond the HELAA, factors such as landscape, flooding, settlement form and site availability.</u></p> <p>This section deals with the strategic settlements of Buckingham, Haddenham, Winslow and Wendover (Aylesbury is covered in the previous sub-section and is considered to be a sub-regional strategic settlement). The strategic settlements are the most sustainable towns and villages in the district as they have the highest provision of services and facilities and are therefore the focus for the majority of the rest of the district’s development. As set out in Policies S2 and S3, the strategic settlements (excluding Aylesbury) will provide a total of 5,730 5,227 new homes between 2013 and 2033. Those sites that already have planning permission (as at 2016/17 2017/18) and homes already built in the period 2013-2017 2018 are included in the total to be provided.</p> <p><u>Aylesbury Vale will deliver a total of 30,233 new homes across the Plan period. Taking account of commitments, completions and allocations in Aylesbury Garden Town already listed in policy D1, and a windfall allowance, 12,759 homes are allocated across the rest of the district.</u></p> <p>Buckingham, Haddenham and Winslow all have neighbourhood plans which have had a high level of community support, albeit the housing policies in the Haddenham neighbourhood plan have since been quashed. This Plan aims to reflect the need for housing delivery in the most sustainable locations whilst not undermining the aims of the neighbourhood plans, taking the quashed allocations, where possible, in the Haddenham neighbourhood plan as the community’s preference for the location of development. This Plan allocates the reserve sites at Buckingham and Haddenham, and just one site beyond the neighbourhood plans’s expectations/allocations, at Haddenham and Winslow, specifically north of Rosemary Lane at Haddenham (at least 315 269 homes) and east of the B4033 at Winslow (585 at least 315), and allocates two further sites at Buckingham, reflecting it being the second most sustainable settlement in the district, specifically Moreton Road at Buckingham (130 homes) and land off Osier Way, south of A421 and east of Gawcott Road (420 homes).</p> <p>In terms of Wendover, approximately 1,000 homes will come forward during the Plan period at RAF Halton Camp after its closure in 2022. This is considered to be a realistic and somewhat conservative estimate, and the figure could increase as detailed masterplanning is developed.</p> <p><u>The Local Plan also allocates sites for growth within Aylesbury Vale at the edge of Milton Keynes namely North East Aylesbury Vale and this area forms its own category in the settlement hierarchy. The same appraisal process detailed above has been followed to select these sites and consideration has also been given to Milton Keynes’ capacity to accommodate further growth.</u></p> <p><u>D2 Delivering site allocations in the rest of the district</u></p>	
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	<p><u>The rest of the district outside of Aylesbury Garden Town plays an important role in delivering the required growth in the Vale. The site allocations identified in this policy should be developed in accordance with polices S1, S2, S3 and S5.</u></p> <p><u>The rest of the district outside of the Garden Town will deliver 12,759 new homes. The Policies Map allocates the following major sites in the strategic settlements and in North East Aylesbury Vale for development:</u></p> <ul style="list-style-type: none"> • <u>D-NLV001 Salden Chase</u> • <u>D-WHA001 Shenley Park</u> • <u>D-BUC043 Land west of AVDLP allocation BU1 Moreton Road, Buckingham</u> • <u>D-BUC046 Land off Osier Way (south of A421 and east of Gawcott Road)</u> • <u>D-HAD007 Land north of Rosemary Lane</u> • <u>D-HAL003 RAF Halton</u> • <u>D-WIN001 Land to east of B4033, Great Horwood Road</u> <p><u>The following sites are also allocated in large and medium villages:</u></p> <ul style="list-style-type: none"> • <u>D-SCD003 Land at Queen Catherine Road</u> • <u>D-STO008 Land south of Creslow Way, Stone</u> • <u>D-WAD006 Allotment site, A41</u> • <u>D-WHI009 Holt's Field, Whitchurch</u> • <u>D-CDN001 Dadbrook Farm</u> • <u>D-CDN003 Dadbrook Farm</u> • <u>D-ICK004 Land off Turnfields</u> • <u>D-MMO006 Land east of Walnut Drive and west of Foscode Road</u> • <u>D-MGB003 Leopold Farm and area to the west</u> • <u>D-NLV005 Land south of Whaddon Road and west of Lower Rd, Newton Longville</u> • <u>D-QUA001 Land south west of 62 Station Road, Quainton</u> • <u>D-QUA0014-016 Land adjacent to Station Road, Quainton</u> <p><u>The design and delivery of development at allocations in the rest of the district should adhere to the site specific allocation policies and other policies in the Plan.</u></p>	
AM086	<p>Wendover is situated on the northern edge of the Chilterns AONB and is one of the most sustainable settlements in the district due to the good provision of services and facilities. RAF Halton is located in the parish of Halton, which adjoins Wendover. The Defence Infrastructure Organisation (DIO) has confirmed that RAF Halton is to close <u>finally</u> in 2022 2025 and because it is in reasonable walking and cycling distance of Wendover's services and facilities, it is appropriate that it be redeveloped for housing and other associated uses. The allocation is shown on the Policies Map.</p>	<p>We propose the following additional amendments:</p> <p>Wendover is situated on the northern edge of the Chilterns AONB and is one of the most sustainable settlements in the district due to the good provision of services and facilities. RAF Halton is located in the parish of Halton, which adjoins Wendover.</p>

		<p>The Defence Infrastructure Organisation (DIO) has confirmed that RAF Halton is to close finally in 2025 <u>with a phased closure and development from 2022</u> and because it is in reasonable walking and cycling distance of Wendover's services and facilities, it is appropriate that it be redeveloped for housing and other associated uses. The allocation is shown on the Policies Map.</p>
<p>AM087</p>	<p>The site outline includes a number of listed barrack blocks, <u>and other designated and non-designated heritage assets that will need to be conserved and enhanced in any redevelopment, as well</u> as many non-listed buildings and an existing road network. It excludes Halton House and its grounds, a number of open recreation areas, areas of woodland and the airfield and associated buildings. As set out in the NPPF, limited infilling or the partial or complete redevelopment of previously developed sites, whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development is an exception to not allowing new housing development in the Green Belt. Therefore it is considered that redevelopment and/or refurbishment of existing buildings in the first phase of development would be appropriate and not require that the site be removed from the Green Belt at this stage. This is set out in policy S4 in this plan.</p>	<p>We propose the following replacement wording:</p> <p><u>The site allocation comprises a variety of heritage assets, including several grade II listed barrack blocks, a Scheduled Ancient Monument and a number of non-designated heritage assets. The site allocation also forms part of the setting of Halton House, its Registered Park and Garden and the Halton Conservation Area. It excludes Halton House and its grounds, a number of open recreation areas, areas of woodland and the airfield and associated buildings.</u></p> <p><u>Any development should be informed by a full understanding of the heritage value of the site and its immediate environs. Development should preserve the significance of designated heritage assets, including any contribution made by their setting, and seek opportunities to better reveal (enhance) their significance. New development should also seek to retain the memory of RAF Halton's historic military function.</u></p>

MM086	<p>The proximity of the Chilterns AONB will need to be addressed in the design and layout of any development. The masterplan SPD for the site will establish the site layout and disposition of land uses. <u>The amount and quality of existing sports provision within the allocation and elsewhere around the camp is a valuable asset which is why policy D-HAL003 requires its retention wherever possible in any proposed redevelopment.</u></p>	
MM087	<p>4.137 The development of this site will adhere to the following place shaping principles: In the first phases, development will be concentrated on those areas that are already built-up, through the redevelopment or remodelling of existing buildings.</p> <ul style="list-style-type: none"> ● Provision of 50% green infrastructure, to reflect the high level of open space already present on the site including green corridors linking development with the surrounding countryside ● Provision of links to and from Aylesbury Town and to the wider area including for walking and cycling ● Respond positively to the best characteristics of the surrounding area. 	The paragraph number is 4.134.
MM088	<p>Allocated For</p> <p>Around At least 1,000 homes during the Plan period and associated infrastructure, services and facilities including a primary school, new local centre, new access routes if needed and new green infrastructure</p> <p><i>Add new row to policy below 'Allocated for':</i></p> <p>Expected time of delivery</p> <p><u>No homes to be delivered 2018-2023 and 1,000 homes to be delivered 2023-2033</u></p> <p>Site-specific Requirements</p> <p>Development proposals must be accompanied by the information required in the Council's Local Validation List and comply with all other relevant policies in the plan, including the principles of development for Aylesbury Garden Town and the Masterplan SPD to be prepared for the site. In addition, proposals should comply with the following criteria:</p> <p>a. Provision of land for <u>at least</u> 1,000 dwellings during this plan period at a density that takes account of the existing curtilage, <u>the scale and massing</u> of the buildings on the site, and that of the adjacent settlement character and identity if appropriate, <u>as well as retaining the openness of the green belt</u></p> <p>b. <u>Be planned in a manner that responds positively to the best characteristics of the surrounding area</u> using a landscape-led approach, taking account of the character and setting of the Chilterns AONB</p>	<p>We suggest and propose the following replacement wording:</p> <p><u>i. Be planned in a manner which responds to the historic significance of the site, using a heritage-led approach to preserve the significance of heritage assets and their settings, whilst ensuring viable uses consistent with their conservation.</u></p> <p><u>j. Provision of sufficient quantity and quality of sport and recreation provision commensurate to the need generated by the new development.</u></p>

	<p>c. Provision of junction improvements onto the B4009 Upper Icknield Way</p> <p>d. Provision for public transport into Wendover and to surrounding areas</p> <p>e. Establishment of and safeguarding for a network of cycling and walking links <u>to and from Aylesbury Town and to the wider area</u></p> <p>f. Provision of <u>50% green infrastructure, to reflect the high level of open space already present on the site including green corridors</u>, to link to other new development areas and the wider countryside</p> <p>g. Provision of land, buildings and car parking for a combined primary school including playing field provision</p> <p>h. Provision of land, buildings and car parking for a new local centre including community hall.</p> <p>i. <u>The conservation and enhancement of heritage assets and their settings whilst ensuring viable uses consistent with their conservation</u></p> <p>j. <u>The retention of existing sports facilities as part of a long-term strategy for sport and recreation to serve new residents and the existing community</u></p> <p>Phasing and Delivery Programme</p> <p>Development of this site will come forward towards the latter part of the plan period as the site will not be <u>fully</u> released until 2022 2025.</p> <p>Further detail about phasing and implementation will be set out in the masterplan SPD for the site</p> <p>Implementation Approach</p> <p>Development at RAF Halton will come forward towards the latter end of the Plan period, and only once a masterplan SPD for the allocation has been prepared and adopted by the Council. Proposals for development within the RAF Halton Strategic Site Allocation will be expected to demonstrate how they <u>deliver a comprehensive redevelopment of this site and</u> positively contribute to the achievement of the SPD and the Aylesbury Garden Town principles as set out in Policy D1.</p>	
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We trust that our proposed changes set out above are considered acceptable and will be incorporated into the final version of the VALP. In the meantime, if you require any additional information, please do not hesitate to contact Tim Byrne of these offices on 0207 087 5478 or Jennifer Watson also of these offices on 0207 399 5346. We look forward to receiving acknowledgement of our submission.

Yours sincerely,



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Tim Byrne

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For and on Behalf of JLL