

Vale of Aylesbury Local Plan – Proposed Main Modifications November 2019

D-AGT1 Consortium response

These representations to the Proposed Main Modifications are submitted by the principal landowners and promoters of the D-AGT1 allocation site (namely Lands Improvement, CALA, Vanderbilt Strategic and Redrow Homes) herein referred to as “the Consortium”.

The Consortium respond to each of the relevant Main Modifications in turn, addressing the NPPF tests of “soundness”¹, though the principal overarching issues raised are summarised as follows:

1. In principle support for the recognition that D-AGT1 should deliver in excess of 1,000 dwellings, though that the modifications do not go far enough. The site can deliver at least 1,600 homes and this should be reflected in the VALP to make it sound;
2. The proposed AGT-1 Masterplan SPD is unnecessary and unsound. It will neither be necessary to help applicants make successful planning applications nor aid infrastructure delivery. The requirement for an additional layer of planning policy would simply delay the delivery of housing on the site;
3. The introduction of a stipulation that development on the site (other than 125 dwellings already consented) should not commence before 2024 is unsound. There is no rationale or evidence base to support this and development on the site is not reliant on infrastructure related to the development of HS2 as asserted in the modified text. This is because the development of AGT-1 is not contributing to SEALR which is to be funded and delivered by other means;
4. The introduction of policy text placing a moratorium on taking vehicular access from the South East Aylesbury Link Road (SEALR) is not sound. There is no evidence base to support this and the Consortium can demonstrate that safe and appropriate access can be achieved directly onto the SEALR. The supporting Technical Note from Vectos submitted with these Reps supports the Consortiums evidence;
5. The Consortium supports the strategy to deliver sustainable transport in Aylesbury through encouraging modal shift;
6. The approach adopted by AVDC to defining Green Infrastructure is not appropriate and is inconsistent with all reasonable and industry recognised definitions. It conflates Green Infrastructure with public open space and as such it imposes an unrealistic and unnecessarily onerous constraint on development.

The Consortium are particularly concerned that a number of modifications are proposed that are not supported or justified by any new or updated evidence produced by AVDC.

¹ Paragraph 182 of the 2012 NPPF – which is applicable to the examination of the VALP through the transitional arrangements.

Although the current consultation only invites comments on the Proposed Main Modifications, the Consortium notes that there were a number of matters discussed at the EiP sessions on which the Inspector asked for a response or further work to be progressed, that have not been subject to a modification. We make a note of these points in our response to MM035 below.

Ref	Page	Section	Proposed Modifications (shown in strike through or underlined)	Consortium Main Mods Representations
MM031	69	D1 Delivering Aylesbury Garden Town	<p>Aylesbury will deliver at least 16,586 new homes. Taking account of commitments and completions, 7,810 <u>3,539</u> homes are allocated at Aylesbury in the Plan.</p> <p>...</p> <p>a) To create distinctive, <u>inclusive</u>, sustainable, high quality, successful new communities <u>which support and enhance existing communities</u>, with the highest quality, planning, design and management of the built and public realm. This will ensure that new garden communities and development within the Garden Town is distinctive, <u>enhancing creates a local identity, enhances local assets and establishing</u> establishes environments that promote health, happiness and well-being. Detailed The Aylesbury Garden Town design principles will be set out in the AGT Framework and Infrastructure SPD and detailed design guidance will be set out within the overarching Aylesbury Garden Town Vale District Design Guidance SPD and individual site-specific supplementary planning documents (SPDs). AGT1 Masterplan SPD</p>	<p>The Consortium support the principle of increasing the overall housing requirement for Aylesbury over the plan period, and that this is now confirmed as a minimum requirement. For consistency with the representations to MM035 the Consortium recommends that the text at paragraph 4.7 should confirm that the homes allocated in at Aylesbury also represents a minimum and accurately reflects the capacity of D-AGT1 to accommodate around 1,600 homes (i.e. increasing the figure of 3,539 by 600 units).</p> <p>The Consortium objects to the requirement for a specifically prepared AGT-1 Masterplan SPD. By the time of the Examination in Public, the level of justification for this approach and the level of objections to it prompted the Inspector to raise it as Agenda Item 2 for Session 27 on 17 July 2018 (“Is an SPD necessary”). The justification at that point was evidently not persuasive and in the Consortium’s view was not advanced during Session 27. The Inspector noted the detailed criterion in draft policy AGT1 and noted that he shared concerns raised in submissions about the purpose and function of the SPD. The Inspector noted that the issues raised by the Council in relation to equalisation agreements would exist whether or not an SPD exists.</p> <p>The requirement for a specific SPD in relation to this site would introduce an unnecessary layer of planning policy. The Council did not provide anything during Session 27 that reliably explained why this was justified. It would in fact serve to delay the delivery of housing. Each of the other AGT sites have progressed through the planning application process without the need for a site-specific SPD (the requirement for any other SPDs other than AGT-1 has therefore been removed through the proposed modifications) and parts of the AGT-1 site itself have progressed through the planning application process without the need for a site-specific SPD.</p> <p>Paragraph 153 of the 2012 NPPF (under which the VALP is being examined under the transitional arrangements) is clear on the purpose SPDs, that they “ <i>should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessary financial burdens on development</i>”.</p> <p>Taking these reasons in turn:</p> <ol style="list-style-type: none"> 1. Helping make successful applications: The planning applications on the other AGT sites, and on parts of D-AGT1, have been deemed acceptable by AVDC without the need for any such additional SPD guidance. There is no justification for taking any different approach for the remainder of AGT-1. There is sufficient detail in the D-AGT1 policy – setting out a number of specific requirements – that a further SPD would not be necessary. This is now even truer with the modifications to the site-specific requirement criteria in Policy D-AGT1 proposed by MM035, which provide further detail. Matters of detailed design can be appropriately dealt with through the planning application process.

				<p>The Consortium are, however, committed to a joined up and coordinated approach and have, with discussions with AVDC, prepared a draft Framework Masterplan for the site. A draft of the document, which is a revised version of a draft discussed with AVDC on 5th March 2019, is attached to these representations. The purpose is to ensure a cohesive and co-ordinated approach to development of the allocation as a whole and an overarching strategic context for separate planning applications on the land parcels which comprise the allocation site.</p> <p>An outline planning application was submitted by Lands Improvement in April 2019 (LPA ref 19/01628/AOP) for up to 750 homes along with open space, landscaping, community facilities, land to accommodate a primary school, drainage features and associated infrastructure. This application adheres to the principles established in the draft Framework Masterplan and is entirely appropriate in planning terms in its own right. An additional SPD is not required to make a sound planning decision on this application.</p> <p>2. Aid infrastructure delivery: The draft Framework Masterplan demonstrates the coordinated approach to delivering infrastructure requirements for AGT-1 as a whole, including a joined up approach to delivering open space, Green Infrastructure, maintaining public rights of way, access and the required buffer between the development and Stoke Mandeville.</p> <p>The application by Lands Improvement puts this approach into practice and promotes development parameters that are in accordance with the draft Framework Masterplan. This is exemplified by the proposals for school provision. The development on Lands Improvement's site would generate demand for a 1FE primary school, but accommodate the capacity for a 2FE primary school which would be sufficient to meet the needs of the entire AGT-1 site. If the Lands Improvement site would be delivered first, or that development commences on the land to the east of the rail line, there is flexibility in the application to enable the school to come forward as part of that development, to ensure delivery in an early phase. An appropriate mechanism would be included in the s106 agreements to ensure an equitable contribution from the different developers.</p> <p>The Consortium have prepared a draft Memorandum of Understanding (MoU), which is attached to these representations. The purpose of the MoU is to ensure the coordinated delivery of the allocation in accordance with the draft Framework Masterplan and that the key infrastructure will be secured by way of individual S106 agreements binding each planning application.</p> <p>The draft Framework Masterplan also demonstrates the commitment to the safeguarding of land for the proposed SEALR. This would be delivered by BCC subject to a separate planning application and is not a delivery requirement of the allocation.</p> <p>The need for additional SPDs was discussed at EIP Session 27. During this session the Inspector shared the Consortium's concerns and noted that the issues raised by AVDC in relation to equalisation agreements would exist whether or not the SPD exists. These concerns can in any event be allayed by the Consortium's MoU.</p> <p>In summary, an additional SPD would not be justified as it does not represent a proportionate evidence base for the delivery of a proposed site allocation and would not be effective or positively prepared as it would serve to delay</p>
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MM032	72	4.33	<p>Given the large number of smaller <u>parcels sites</u> that make up this allocation, an overall <u>AGT1 Masterplan SPD</u> will be essential to ensure a co-ordinated and comprehensive approach to development, and to guide phasing of the site. <u>This must include a coordinated approach to vehicular access which should be achieved from the B4443 Lower Road and A413 Wendover Road</u></p>	<p>As set out in response to MM031, the Consortium objects to the requirement for a specifically prepared AGT-1 Masterplan SPD.</p> <p>The Consortium also objects to the proposed modification to the text through MM032, which seeks to stipulate that access should be achieved from Lower Road or Wendover Road. The modification to the actual policy wording of D-AGT-1 (through MM035) goes further to specifically state that <i>"no vehicular access to or from the South East Aylesbury Link Road (SEALR) will be permitted to serve the development parcels"</i>.</p> <p>The Consortium do not object to the principle of a coordinated approach to vehicular access and address this in the draft Framework Masterplan. There is, however, no justification for the imposition of a moratorium on direct access from the SEALR.</p> <p>There has been no change in policy, guidance or material circumstances that support any change to this approach or policy wording. Furthermore, there is no additional supporting evidence presented by AVDC which seeks to support this approach.</p> <p>The Technical Note submitted in support of these representations, prepared by Vectos, demonstrates that (by way of example) there is no technical transport planning or highways justification why a direct access to the north eastern part of the AGT-1 allocation could not be taken directly from the SEALR.</p> <p>The modifications proposed by MM032 are therefore not justified or positively prepared and are therefore unsound.</p>
MM033	72	4.35	<p><u>... The 125 permitted dwellings are expected to be delivered between 2019 and 2022. The remainder of the site 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. The AGT1 Masterplan SPD will provide further guidance and information on phasing expected time of delivery.</u></p>	<p>The Consortium objects to the imposition of a restriction on the delivery of housing development until after 2024. There is no good planning or sound reason to delay residential development when there is an imperative on local planning authorities to "boost significantly the supply of housing" (paragraph 47 of the 2012 NPPF and paragraph 59 of the 2019 NPPF).</p> <p>Whilst the 2012 NPPF (and 2019 NPPF) require the illustration of the expected rate of housing through a housing trajectory for the plan period, this does not mean that development plans should restrict development of housing sites until after a specific date where there is no rationale for doing so.</p> <p>The proposed text proposed through MM033 is not accurate in stating that delivery over the remainder of the allocation is dependent on HS2 infrastructure. There is no evidence presented by AVDC to support this assertion, there has been no material change on policy or circumstance and this has not been raised at any stage in the plan making process before now.</p> <p>Our representations to MM031 explain why the need for an AGT-1 Masterplan SPD is not sound. The further suggestion in this modification that the AGT-1 Masterplan SPD would provide guidance on expected time of</p>

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MM034	72	4.37	<p><u>A Master Plan The AGT1 Masterplan SPD for the site will establish elaborate on policy D-AGT1 by advising on the site layout and disposition of land uses..</u></p>	<p>The Consortium objects to the requirement for a specifically prepared AGT-1 Masterplan SPD as set out in response to MM031.</p> <p>Furthermore, in specific response to MM034, there is no need for a further layer of planning policy in relation to site layout and the disposition of land uses. The policy D-AGT1 sets out the site requirements in terms of land use, and the Framework Masterplan clearly demonstrates how the disposition of uses can be established to be feasible and not requiring a further plan-making process. Nor is there any need for further planning policy or guidance on layout. The D-AGT1 policy requirements already set specific parameters for the layout of the site, including for example the need to maintain a buffer between the development and Stoke Mandeville and the need to provide 50% Green Infrastructure. It is entirely appropriate to consider matters of layout through the planning application process, guided by these principles affecting layout. If these principles are not satisfied, then AVDC have sufficient control to withhold planning consent.</p> <p>The delivery of the allocation can come forward, in accordance with the policy and supported by the Framework Masterplan prepared by the Consortium, without the need to await a separate AGT-1 Masterplan SPD – which would simply serve to delay the delivery of housing on the site.</p> <p>The modifications proposed by MM034 are therefore not justified or positively prepared and are therefore unsound.</p>

MM 035	74	D-AGT1 South Aylesbury	<p><u>Expected time of delivery</u></p> <p><u>125 homes to be delivered 2018-2023 and 875 homes to be delivered 2024-2033</u></p> <p>Allocated for (key transport development and land use requirements)</p> <ul style="list-style-type: none"> • 1,000 dwellings • One primary school • Multi-functional green infrastructure • Link road between Lower Road and Wendover Road • Aylesbury South East Link Road (A413 to B4443 Lower Road) • Local centre • Cycling and walking links <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> <ol style="list-style-type: none"> a. Provision of land for around <u>at least</u> 1,000 dwellings at a density that takes account of the adjacent settlement character and identity, <u>integrates new development with the existing built area of Aylesbury and responds positively to the best characteristics of the surrounding area</u> b. Provision of 5 Gypsy and Traveller pitches c. Provision <u>Prioritising the delivery</u> of a dual carriageway distributor road between <u>B4443</u> Lower Road and <u>A413</u> Wendover Road to cross the railway line d. Provision of new access points into the sites <u>development parcels from the B4443 (Lower Road) and A413 (Wendover Road). No vehicular access to or from the South East Aylesbury Link Road (SEALR) will be permitted to serve the development parcels.</u> e. Provision for public transport into the town and to surrounding areas f. Existing vegetation should be retained where practicable, including existing woodlands and hedgerows. Existing public rights of way need to be retained and integrated into the development within 	<p>The Consortium supports the principle of Policy D-AGT1 in allocating the site for residential led development. This principle was established at an early stage in the plan making process and is clearly supported by evidence. There are however matters of detail, both within the policy as originally drafted that are not subject to a proposed modification and with the proposed main modifications.</p> <p>The Consortium set out in detail an objection to the proposed timing of housing delivery in response to MM033. In the event that AVDC do wish to provide differentiation between homes that have consent and future allocation, the figure of 875 should be amended upwards to 'at least 1,475' homes in addition to the 125 already consent (i.e. a total of at least 1,600). We deal with this further below.</p> <p>For the reasons set out below, the Consortium recommends that the first bullet point is updated in line with the modification to criterion (a) to read 'at least 1,600 dwellings'.</p> <p>The Consortium provides representations on each of the policy criteria a turn.</p> <ol style="list-style-type: none"> a) The Consortium support, in principle, the modification of the policy wording from 'around' to 'at least'. It is correct that the VALP should recognise that the site can accommodate more than 1,000 units. This reflects discussions between Lands Improvement and AVDC Officers which confirmed that the 'around 1,000' was never intended to represent a cap and would not preclude applications over the AGT-1 allocation or a higher total number of units where appropriate in planning terms. <p>The Consortium object, however, that the modification has not gone far enough to recognise that the AGT-1 allocation can accommodate at least 1,600 units.</p> <p>This level of housing development is supported by AVDC's evidence base for the draft VALP, including the 2017 Housing and Employment Land Availability Assessment (HELAA) and Cumulative Growth Impact Report (June 2017) (CGIR) prepared for the Council by Aecom which considered that the site has the potential for 1,686 dwellings. The Council committed to revisiting the Aecom report during examination session 27.</p> <p>The HELAA, meanwhile, identifies an indicative capacity of 1,569 across the six land parcels which comprise the D-AGT1 allocation (namely SMD 004, 005, 006, 007, 008 and 016). The CGIR concludes that the D-AGT1 site has the potential to accommodate 1,686 homes, and that this conclusion has been informed by "good urban design principles that ensure buffers are maintained to major infrastructure and highways as well as separation from the existing settlement of Stoke Mandeville".</p> <p>The work on site capacity undertaken by the Consortium as presented in draft Framework Masterplan (section 4.5) supports AVDC's evidence. This includes an analysis of appropriate densities for different parts of the site, and a capacity plan which demonstrates that approximately 1,600 dwellings is appropriate for the site.</p> <p>The Consortium therefore recommend that the criterion (a) should be modified to "at least 1,600 dwellings". This would be accurately reflective of the site's capacity to contribute towards Aylesbury's housing need, as supported by AVDC's own evidence.</p>
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Detailed modelling will be required to confirm 1 in 20, 100 and 1,000 year extents and 1 in 100 year plus climate change extents on the ordinary watercourse (see SFRA Level 2)</p> <p>k. Surface water modelling should be undertaken to define the level of surface water risk and the risk areas/flow paths. Climate change should be modelled using the +40% allowance (February 2016) for rainfall intensity. A surface water drainage strategy should ensure that the development does not increase flood risk elsewhere. Opportunity to mitigate against potential surface water flooding of Stoke Mandeville Hospital</p> <p>l. Risk of overtopping or breach of the Aylesbury Arm (Grand Union Canal) should be modelled</p> <p>m. The development should be designed using a sequential approach. Flood Zones 2 and 3, and 3a plus climate change (subject to a detailed flood risk assessment) should be preserved as green space <u>as shown in the policies map as the area of 'not built development'</u>. with built Built development should be restricted to Flood Zone 1.</p> <p>n. Drainage designs should 'design for exceedance' and accommodate existing surface water flow routes, with development located outside surface water flood areas</p> <p>o. Provision of buffer between the new development and Stoke Mandeville <u>to maintain the setting and individual identity of the village</u></p>	<p>b) There is no proposed modification to this criterion though the Consortium do object to the need for this criterion as set out in previous representations. There is no sound evidence to support the requirement for gypsy and traveller pitches on the D-AGT1 allocation, which was reflected in AVDC's concession at VALP EIP Hearing Session 35 that it needed to review the evidence base in light of the Inspector's questions and submitted evidence by representors. The Consortium were, therefore, expecting the deletion of this criterion as it is unsound on the basis that it is not justified.</p> <p>c) The Consortium note and support that the SEALR has been removed from the list of key transport development and land use requirements. The SEALR will be delivered by BCC rather than the developers of the AGT-1 site. A consequent modification is therefore proposed to criterion (c) of the policy to remove the requirement for 'provision'. The modification, however, confusingly now suggests that proposals should be 'prioritising the delivery' of the SEALR. Given that the SEALR will be delivered by BCC and that it is no longer a requirement of the allocation it is not possible for proposals for the rest of the site to have any influence over it which would constitute the prioritisation of its delivery. As the draft Framework Masterplan (and Lands Improvement's current planning application) demonstrates, development proposed by the Consortium will ensure that delivery of the SEALR is not prevented, by safeguarding of land. The Consortium therefore object to this modification as it is not possible for development proposals to comply with it. It is therefore not effective or justified.</p> <p>d) The Consortium object to the additional text introduced into criterion (d). There is no evidence presented by AVDC to support the moratorium on taking access directly from the SEALR when constructed, if safe access can be provided and would not result in any severe adverse highways effects. This is a matter for the planning application. The current planning application submitted by Lands Improvement does not include an access from the SEALR, but this simply reflects the current status of the SEALR (which is still not subject to any planning application by BCC) and the application demonstrates that appropriate access can be provided from Lower Road to the entire site by means of a bridge over the SEALR land. That said, this costly engineering solution would not be Lands Improvement's preference and would promote an alternative access arrangement from the SEALR to the northern parcel of their land if and when the SEALR is in place. The supporting Technical Note from Vectos demonstrates that there is no technical transport planning or highways justification why this would not be appropriate. The additional proposed text is unnecessary, pre-empts the planning application process with no evidence to support it and is therefore not justified.</p> <p>e) No proposed modification. The Consortium have no objection to this criterion.</p> <p>f) No proposed modification. The Consortium have no objection to this criterion.</p> <p>g) The Consortium supports the principle of green corridors through the site, as demonstrated in the draft Framework Masterplan which shows east west orientated corridors of structural landscaping, a green buffer and north-south green corridors.</p> <p>h) The Consortium do not have any objection to the principle of the additional proposed wording, though it is unclear what purpose it serves.</p> <p>i) Similarly, the additional wording adds little to the policy, and the reason for proposing it is unclear. However, the Consortium do not have any objection in principle. As the draft Framework Masterplan</p>
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MM206			<p>...The Council, <u>Buckinghamshire County Council and, where appropriate, Highways England, will aim work together to achieve this strategy and those improvements required to deliver it. The Council will seek</u> to ensure that development proposals will deliver <u>the improvements identified in the highway and transport studies that underpin the Local Transport Plan</u> improvements to ensure new housing and employment development identified in the Local Plan period does not create a <u>significant negative severe</u> impact on the highway and public transportation network <u>and encourages modal shift with greater use of more sustainable forms of transport</u></p>	<p>The Consortium supports the modification proposed by MM206 to encourage modal shift to more sustainable forms of transport.</p> <p>The commitment to this objective at D-AGT1 is reflected in the Framework Masterplan and exemplified by the current application by Lands Improvement, which promotes a transport strategy designed to promote travel choice and encourage and accommodate a positive change in the propensity for more socially inclusive and sustainable living and travel. This includes a significant package of proposed enhancements to mobility and sustainable travel including:</p> <ul style="list-style-type: none"> • Improvements / upgrading of existing PRoW – Active Travel Corridors; • Improved bus services (with potential to divert buses into the site) on Station Road or DRT; • Shared bike (possibly e bike) scheme and car club; • Community hub; • Residential Travel Planning including Personalised Travel Planning/School Travel Planning; and • Sustainable travel vouchers for each new dwelling to be used towards the cost of a bus pass, bicycle purchase, or cycling / walking equipment / clothing. <p>As such, the proposed modification MM206 is welcomed in the context of providing travel choice, enhancing mobility and engendering modal shift in accordance with national transport planning policy.</p>
MM214	96	T5	<p><u>Rear parking courts will only be provided in exceptional circumstances where no alternative parking can be provided and where the rear parking court is well located in terms of the development it serves, is overlooked, enclosed and secure. The provision of garages and/or car ports will not be counted as a parking space for a development unless they are of at least the size set out in Appendix B</u></p>	<p>The Consortium object to this additional policy wording. The principle of rear parking courts can be an appropriate approach even when other parking options exist. The consideration of their suitability is a consideration for the planning application stage. The modification is too restrictive and therefore not justified.</p>

MM246	256	Green Infrastructure	<p>Green infrastructure</p> <p>Green infrastructure is a strategically planned network of high quality multi-functional green spaces in both urban and rural areas as well as associated features such as trees, hedgerows, ponds, waterways, green roofs and green walls. It is designed, developed and managed to meet the environmental, social and economic needs of communities and wildlife. The term includes open green spaces such as parks and gardens, country parks, allotments, cemeteries, green corridors (potentially including cycleways and rights of way), village greens and trees. It also includes informal amenity green spaces and accessible countryside such as river and canal corridors, woodland, natural grassland, wetlands, lakes and nature reserves (<u>water related green infrastructure is also known as 'Blue Infrastructure'</u>). <u>For the purposes of the VALP, 'Green Infrastructure' includes civic spaces, including market squares and other hard surfaced community areas used for community activities. Where the VALP site allocations require (or development coming forward on any other site that would be required to meet the standards in Policy 11) the provision of 'green infrastructure', private green spaces such as residential gardens do not count towards meeting this requirement as they are not publicly accessible natural green space and so do not meet Natural England's definition of ANGSt in para 11.8.</u></p>	<p>The Consortium Object to the definition of Green Infrastructure introduced by AVDC through this main modification, and specifically that private gardens cannot count towards Green Infrastructure provision on allocated sites. With regard to D-AGT1 this would mean that private gardens could not contribute towards the 50% Green Infrastructure target required by criterion (h) of that policy. The reason stated in the proposed modification is that residential gardens would not count as they are not publicly accessible and would not meet Natural England's definition of accessible natural green space standards (ANGSt).</p> <p>This represents a basic misunderstanding of the distinction between planning for open space and planning for Green Infrastructure.</p> <p>The Natural England guidance on Green Infrastructure (<i>Green Infrastructure Guidance</i>) is very clear in establishing this difference, confirming that Green Infrastructure "<i>considers private as well as public assets</i>".</p> <p>This is reflected within the Ministry of Housing, Communities & Local Government's (MHCLG) definition of Green Infrastructure in the planning practice guidance (PPG) which states that "<i>Green infrastructure can embrace a range of spaces and assets that provide environmental and wider benefits. It can, for example, include parks, playing fields, other areas of open space, woodland, allotments, private gardens, sustainable drainage features, green roofs and walls, street trees and 'blue infrastructure' such as streams, ponds, canals and other water bodies. References to green infrastructure in this guidance also apply to different types of blue infrastructure where appropriate</i>".</p> <p>The evidence base referred to in the draft VALP, including the <i>Vision and Principles for the Improvement of Green Infrastructure in Buckingham and Milton Keynes</i> specifically states that it encompasses the PPG definition.</p> <p>This is further supported by the guidance provided within Section 4, Principle 9 of Guide 7 (Planning for Green and Prosperous Places) of 'Garden City Standards for the 21st Century' which states "<i>As a general rule, 50% of the land total in a new Garden City should be green infrastructure, including private gardens and green roofs.</i>"</p> <p>Accordingly, whilst the Consortium recognise the need for 'conventional' open space to be accessible to meet the ANGSt standards, this does not mean that all Green Infrastructure has to be accessible.</p> <p>The Consortium recommend that the additional text proposed by MM246 should not be accepted, as it is not justified or in accordance with national policy, and that Section 11 of the VALP provides a very clear distinction between Green Infrastructure and open space which is required to meet the ANGSt standards.</p> <p>The draft Framework Masterplan demonstrates how a total of 52ha of the 92ha D-AGT1 allocation site can be delivered for Green Infrastructure. This would include around 36ha of public open space, which is significantly in excess of the 23ha requirement in line with AVDC's open space requirement.</p>
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² <https://www.gov.uk/guidance/natural-environment#green-infrastructure>