

Ref: GA/RW/03114/L0037

VALP Consultation Reference No. 29866

26 November 2019

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

By E-mail: localplanconsult@aylesburyvaledc.gov.uk

Dear Sir/Madam

Representations to the Proposed Main Modifications Consultation (2019) to the Vale of Aylesbury Local Plan

I write on behalf of our clients Bellway Homes and their interests in land west of AVDLP allocation BU.1 (VALP Site Ref. BUC043), Moreton Road, Buckingham to provide our representations to Proposed Main Modifications (MM) (2019) to the VALP, as set out below.

Main Modifications

MM No.	MM082, BUC043 Land west of AVDLP allocation BU1 Moreton Road, Buckingham
Object/support	Object to 'Expected time of delivery' and criteria m
Comment	<p>Expected time of delivery: This should be amended for reasons explained below. The amended policy wording is needed to ensure it is justified, effective and consistent with national policy.</p> <p>A detailed planning application is being prepared for the site to be submitted by the end of 2019, evidenced by the pre-application enquiry submitted to AVDC earlier this year (LPA Ref. 19/01776/PREMTG), which has been the subject of consultee response and two meetings with officers in advance of application submission.</p> <p>The issues to be addressed for residential development of the site have been rehearsed previously via an outline planning application (Ref. 14/02601/AOP) which received no objections from statutory consultees. The application was the subject of a call-in Inquiry, and the Inspectors Report concurred with AVDC officers in finding there were no physical, technical or environmental reasons for withholding</p>

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	<p>planning permission. The Inspector found that the proposals would result in no significant adverse effects and offered significant benefits, in terms of housing, open space and sports facilities.¹</p> <p>The detailed application now being prepared will avoid the need for subsequent reserved matters submissions and enable development to start on-site sooner.</p> <p>This is a third phase of development by Bellway, one of the country's largest housebuilders, in this location, having successfully completed two earlier phases on adjacent parcels of land which are completed and fully occupied. They therefore have the track-record, technical know-how, the resource and the commitment to deliver 130homes on-site in the forthcoming 5year period. Subject to receipt of detailed planning permission and discharge of pre-commencement planning conditions, the site is anticipated to deliver housing on the following timeline:</p> <table border="1"> <thead> <tr> <th></th> <th>2019/20</th> <th>2020/21</th> <th>2021/22</th> <th>2022/23</th> <th>2023/24</th> </tr> </thead> <tbody> <tr> <td>Land west of AVDLP allocation BU1, Moreton Road</td> <td></td> <td></td> <td>30</td> <td>50</td> <td>50</td> </tr> </tbody> </table> <p>National policy requires authorities to identify sites for years one to five of the plan period and maintain a 5year supply of sites as a minimum. The role that this site can play in that regard should be viewed positively, with appropriate adjustments made to the Council's housing trajectory. The site will bolster the short-term supply of housing and provide a greater degree of certainty to the Council's 5year deliverable supply of housing sites.</p> <p>Criteria M: New criteria m is considered unduly restrictive in its wording and should be amended to reflect that the Town Council is not the sole body capable of maintaining the amenity land.</p>		2019/20	2020/21	2021/22	2022/23	2023/24	Land west of AVDLP allocation BU1, Moreton Road			30	50	50
	2019/20	2020/21	2021/22	2022/23	2023/24								
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Revised wording	<p><u><i>The site is expected to be delivered in full between 2019-24.</i></u></p> <p><i>m. Amenity land which is to be provided with a NEAP and LEAP with sports pitches. The amenity land, subject to agreement, would be transferred to the Town Council, <u>or other appropriate body</u>, following a maintenance period and a commuted sum paid to the Town Council, <u>or other appropriate body</u> for the upkeep of that land. <u>In the event a transfer cannot be agreed the owner shall thereafter maintain or procure the maintenance of the amenity land.</u></i></p>												
MM No.	MM082, BUC043 Land west of AVDLP allocation BU1 Moreton Road, Buckingham												
Object/support	Support criteria I												
Revised wording	N/A												
MM No.	MM010, Policy S2 Spatial Strategy												
Object/support	Object												
Comment	To be positively prepared based on a strategy to meet objectively assessed development requirements and be consistent with the approach adopted to housing targets in the VALP the housing targets for settlements listed under the second part of the policy, including Buckingham, should be expressed as ' at least ' figures. By way of example Policy S2, part b should be expressed as follows:												
Revised wording	<i>Buckingham will accommodate growth of <u>at least</u> 2, 166 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.</i>												
MM No.	MM079, paragraph 4.122												
Object/support	Object												
Comment	The former wording should be reinstated. Policy D2 is permissive of 'small-scale areas of land', subject to the specified criteria irrespective of whether the first part of the sentence, repeated below, is triggered or not. The change is needed to ensure the Local Plan meets the tests of soundness, in particular positively prepared, effective and consistent with national policy.												
Revised wording	<i>The only exceptions to this are where the Council's monitoring of delivery across the district shows that the allocated sites are not being delivered at the expected rate, or <u>and</u> where the proposals are for small-scale areas of land in accordance with Policy D2.</i>												

¹Inspectors Report, PINS Ref. APP/J0405/V/16/3151297, paragraph 207

MM No.	MM080, policy D2 Proposals for non-allocated sites at strategic settlements, larger villages and medium villages
Object/Support	Support
Comment	The amendment to criteria C of the policy is supported.
Revised wording	N/A
MM No.	MM115, policy H1 Affordable Housing
Object/support	Object
Comment	<p>The requirement of 25% affordable housing is expressed as a minimum so allows for circumstances where more affordable housing can be delivered where circumstances dictate this to be appropriate. The 25% level has been set with regard to latest evidence of needs and viability assessment and will be more up to date and robust that which has informed made neighbourhood plans. It should not therefore be automatically the case that a higher level is required, informed by a more dated neighbourhood plan policy.</p> <p>The amendment is required to ensure the policy is positively prepared, justified and consistent with national policy.</p> <p>The final part of the policy as amended states the following:</p> <p><i>Further details regarding the implementation of this policy will be provided in the Affordable Housing Supplementary Planning Document SPD.</i></p> <p>Consistent with previous representations made on this policy the SPD should be made available now alongside the VALP for comment, or reference to the SPD should be omitted.</p>
Revised wording	<i>Residential developments of 11 or more dwellings gross or sites of 0.3ha or more will be required to provide a minimum of 25% affordable homes on site except where a different requirement already applies in a neighbourhood plan which has been made before the adoption of the VALP. In addition:</i>
MM No.	MM152, Policy H6a Housing Mix
Object/support	Object
Comment	Objection is raised to this modification which is considered to be unduly prescriptive. Developers are well placed to understand the market demand for the type of housing needed in a particular location. The wording of the policy should allow for a degree of flexibility to respond to local requirements and not tied to a document which may not reflect localised needs. To be more positively prepared and justified the policy should be amended as set out below.
Revised wording	<i>New residential development will be expected to provide a mix of homes to meet current and expected future requirements in the interests of meeting housing need and creating socially mixed and inclusive communities. The mix of housing will be negotiated having regard to the Council's most up-to-date evidence on housing need, and evidence from developers on local market conditions. and shall be in general conformity with AVDC latest evidence* and Neighbourhood Development Plan evidence where applicable for the relevant area.</i>

We trust that these comments will be taken into account. Should you have any queries or need anything further please do not hesitate to contact either myself or my colleague Roger Welchman.

Yours faithfully



Geoff Armstrong (geoff.armstrong@arplanning.co.uk)

Director

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