

David Vowles [29224]

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MM186

There is conflict between the revised policy E5 and policy D6. Whereas Policy D6 supports retail development within the town, local and village centres, including new local centres within major development areas, the modified policy E5 (inadvertently?) restricts retail development, other than small side rural development, to sites within, adjoining, or outside the defined town centers of Aylesbury, Buckingham, Winslow and Wendover.

To resolve this conflict Policy E5 needs to be further modified to:-

1: Cover development, adjoining or outside local and village centres, including local centres in major development areas, in accordance with policy D6 and the NPPF definition of town centres;

2: Differentiate between retail and leisure uses when determining if an impact assessment is required. No evidence has been produced by the council which warrants a different threshold for leisure development from the fall-back figure of 2500 square metres set out in the NPPF. The only evidence for a lower figure relates to retail development; and

3: Draw a policy distinction, as regards retail development, between the Aylesbury Primary Shopping Area and the vastly more extensive Aylesbury town centre. Without this distinction there would be no priority difference for sites within the PSA and sites within the wider town centre but possibly well outside the PSA. This would negate the purpose of defining the PSA and would result in confusion and conflict with the definition of "edge of centre" for retail development given in the NPPF. Making such a distinction would also reflect the use of the words "shopping centre" and "existing retail centre" especially in sub paragraphs e) and f) of the submitted version of policy E5.

In addition, provision should be made for the use of conditions controlling the nature of goods sold at the edge-of-centre or out-of-centre locations where needed to protect the vitality and viability of an existing centre.

See suggested policy E5 attached

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

Yes

Outline

To further develop the case for modifying policy E5 if this would help the inspector

Suggested revised policy

Proposals for main town centre uses that do not comprise small scale rural development and are not located within defined town centers⁶, existing or proposed local centres, or village centres will be permitted only if no suitable sites are available within such centres. Where no sites are available preference will be given to sites in edge of centre locations. When considering edge of centre and out of centre proposals preference will be given to accessible sites that are well connected to the town, local or village center.

In addition, proposals for retail and leisure development, including extensions, on sites not allocated in plans and located outside town, local or villages centres will be subject to compliance with the following criteria:

A) The proposal would not have a significant adverse impact on the vitality and viability of any town, local or village centre either as an individual development or cumulatively with similar existing or proposed developments. An impact assessment must be submitted with any application for retail development if the proposal is likely to affect the Aylesbury Primary Shopping and is for 1500 square meters or more, or if the proposal is likely to affect any other town, local or village centre and is for 400 square metres or more. An impact assessment must be submitted with any application for leisure development of the proposal is likely to affect any town, local or village centre and is for 2500 square meters or more.

B) The proposal does not have a significant adverse impact on existing, committed and planned public and/or private investment in a centre or centres in the catchment area of the proposal either as an individual development or cumulatively with similar existing or proposed developments.

When retail developments outside town, local and village centres and which exceeds the thresholds set out in this policy is approved, conditions must be imposed to control the type of goods sold where this is necessary to safeguard the vitality and viability of the center or primary shopping area.

⁶As defined in the Glossary.

Representation form

MM 070

Do you support or object?

Object

Do you consider the Local Plan to be sound?

No

On what grounds?

Effective

To avoid possible confusion some of the site descriptions in Policy D2 should be made fuller and consistent.

Specify change you think are needed;

Policy D2

Add "Newton Longville" to description of D-NLV001

Add "Whaddon" to description of D-WHA001

Add "Buckingham" to description of D-BLU046

Add "Haddenham" to description of the D-Hd007

Add "Winslow" to description of D- WIN001

Add "Cuddington" to description of D-CDN001 & D-CDN003

Add "Ickford" to description D-ICK004

Add "Maids Morton" to description of D-MMO006

MM080

Do you support or object?

Object

Do you consider the local plan to be sound?

No

On what grounds?

Effective

Representation

The footnote to policy D2 refers (twice) to “villages” when the policy covers towns as well as villages. The footnote should therefore refer (twice) to “settlement” rather than “village”.

Specify change you think are needed;

Replace “village” with “settlement” (twice) in footnote to Policy D2.

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

No

Do you wish to be notified?

When the inspectors report is published – Yes

When the Vale of Aylesburys Local plan is adopted Yes

Representation form**MM096**

Revised paragraph 4.153 incorrectly includes a committed site at Marsh Gibbon as an allocation.

Changes

Delete reference to “Marsh Gibbon” (9) from paragraph 4.153

MM012

Do you support or object ?

Object

Do you consider the Local Plan to be sound?

No

Effective

Representation here

The references (in Table 2) to “including Hartwell” (Stone), “including Fleet Marston” (Waddesdon), “including Broughton” (Bierton), “and Ledburn” (Mentmore), and “including Pitchcott” (Oving) are inappropriate as these are discrete “other” settlements not forming part of the named larger, medium or smaller villages. As such they are subject to Policy D4 rather than D2 or D3. The reference “listed in the settlement hierarchy document” is inappropriate as it refers to a document not forming part of the development plan.

Changes:

Table 2

Delete “(including Hartwell)”, “(including Fleet Marston)”, “(including Broughton)”, “and Ledburn” and “(including Pitchcott)”.

Delete “(listed in the settlement hierarchy document)”

MM070, Object, Not sound, Effective, Consistent with National Policy

Total housing completions in 2017/2018 was 1414. According to the July 2019 Housing Trajectory (added to the Plan at appendix A) completions are predicted to rise to a (challenging) peak of 2031 in 2020/2021 then drop slightly before rising again to a second peak of 1985 in 2024/25. Thereafter they will drop to a total of 989 in 2032/33.

The peak of if just under 2000 completions predicted in 2024/25 correlates with the current Government target of building 300,000 houses per year by the mid 2020's (the incoming Government post 12/12/19 may, of course, change this target). Presumably it would be the intention that this national target, once reached, would be maintained for, say, at least 5 years. If so it would follow that, if the projection (which according to Policy S9a) of the Plan is fact a target) for almost 2000 dwellings per year is reached in 2024/25, building in the district should also be maintained at this level for at least 4 years. This should require about 1500 additional dwellings to be built in this period beyond the target set out in the Plan.

Using data from the Housing Trajectory I have compiled the attached table showing how the predicted housing output would be distributed geographically.

In 2018/19 the trajectory predicts the building of 1443 dwellings, of which 1269 would be built on 50 sites or more than 5 dwellings as follows:

Aylesbury 722 dwellings on 18 sites

Buckingham 14 dwellings on 2 sites

Haddenham 69 dwellings on 3 sites

Wendover 1 dwelling (the residual development on a larger site)

Winslow 55 dwellings on 1 site

North East AV 60 dwellings on 1 site

Larger villages 296 dwellings on 17 sites

Medium villages 42 dwellings on 3 sites

Smaller villages 10 dwellings on 4 sites (including residual development on larger sites)

In 2026/27 1517 dwellings are predicted to be built, but on only 13 sites, at Aylesbury (8 sites), Buckingham (1 site of 10 dwellings) Halton Camp (1 site) North East AV (2 sites) and Waddesdon (1 site of 15 dwellings). After 2026/27 development on sites of more than 5 dwellings will take place only in Aylesbury, Halton Camp and North East AV. Indeed in the last 6 years of the Plan the trajectory predicts that 7369 dwellings will be built in on just 9 sites, 6 of them in Aylesbury.

Although some of the larger sites at Aylesbury and the sites at Halton Camp and North East AV could be subdivided and developed separately, there must be considerable doubt about the practicality of relying on such a restricted number and distribution of sites.

To mitigate, at least in part, the above shortcoming in housing provision and delivery, which my geographical analysis of the housing trajectory has revealed, I propose, as an interim measure pending a review of the Plan, that additional sites, each for between 5 & 50 dwellings and capable of delivering a total of 1500 dwellings, should be identified by March 2023 in the rest of the district outside Aylesbury, for development after March 2025. Such identification could include via new or reviewed neighbourhood plans. This proposal would also respond to paragraph 41 & 42 of the Inspector's interim findings (ED 166).

If your representation is more than 100 words; please provide a summary under 100 words

Provision should be made in the Plan for the identification, by March 2023, of additional sites for development after March 2025 in the rest of the district outside Aylesbury. Each of these sites should be capable of accommodating between 5 & 50 dwellings and yield a total of 1500 dwellings.

Please specify the changes you think are needed to be made to the proposed main modification:

Insert the following immediately after "D –QUA 014-016 Land at Station Road, Quainton" in the new policy D2:-

"Pending a full review of the Plan further sites of between 5 and 50 dwellings each, totalling 1500 dwellings, will be identified before March 2023 in the rest of the district, including in new or reviewed neighbourhood plans, for development after March 2025.

[See original for table]