



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" value="Mrs"/>
First Name	<input type="text" value="Nicola"/>
Last Name	<input type="text" value="Thomas"/>
Organisation <i>(Where relevant)</i>	<input type="text" value="Bucks & MK NEP"/>
Address Line 1	<input type="text" value="c/o New County Offices"/>
Address Line 2	<input type="text" value="Walton Street"/>
Address Line 3	<input type="text" value="Aylesbury"/>
Post Code	<input type="text" value="HP20 1UA"/>
E-mail Address	<input type="text" value="nthomas@buckscc.gov.uk"/>
Telephone Number	<input type="text" value="07736 480877"/>

2. Agent's Details (if applicable)

Title	<input type="text"/>
First Name	<input type="text"/>
Last Name	<input type="text"/>
Organisation	<input type="text"/>
Address Line 1	<input type="text"/>
Address Line 2	<input type="text"/>
Address Line 3	<input type="text"/>
Post Code	<input type="text"/>
E-mail Address	<input type="text"/>
Telephone Number	<input type="text"/>

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

The NEP's comments to the MMs are provided in the embedded document below.

These are related to

- MM017 (pg 46, Para 3.41) and MM018 (pg 48, S5) – and MM246 (pg 256, 11.1)
- MM224
- MM228
- MM231
- MM227
- MM246
- MM249
- MM253
- MM255
- MM256
- MM258
- MM259
- MM260
- MM034, 039 ,040, 046, 053, 054 jointly

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 embedded document here provides the full representations of the NEP for each MM



NEP's response to
VALP Main Mods const

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

See embedded document for a summary of each of the NEP's main concerns.

A summary of the main concerns is provided here:

1) Definition of Green Infrastructure

The main modifications include a revised definition of Green infrastructure, based on a definition used in an underlying report assessing sport and recreation provision. The revised definition includes as "green" infrastructure, hard-surfaced surfaces such as civic spaces and market squares as well as reference to cycle-ways, footpaths and other transport routes. This definition does not adhere to EU strategy, national policies (e.g. the NPPF and associated guidance), other generally-accepted definitions (e.g. ANGSt – which the VALP proposes now to be referring to and is about provision of "nature nearby" – or CIEEM) or locally-agreed definitions in strategies and policies that AVDC is party to (such as the Bucks GI Strategy, the Aylesbury Vale GI strategy of 2011 and the NEP's 2016 [Vision and Principles for the Improvement of Green Infrastructure in Buckinghamshire and Milton Keynes](#)).

Including such hard-standing surfaces would lead to perverse and unsatisfactory outcomes such as a concrete market square, or a cycle-route "counting" towards required GI provision and therefore taken into account in assessing whether "ANGSt" requirements have been met – which assesses and advocates access to natural greenspace near to where people live. Clearly they should not count in this way. Green Infrastructure is a term referring to areas of natural green space, often multi-functional, and its provision must not be assessed and planned for within the narrower lense of the provision of leisure and cultural facilities. The 2017 sports provision report should not be used to define the typology of green infrastructure, which has no accepted basis in accepted policy, for the VALP.

The NEP strongly disagrees with the new definition additions related to hard surfaced community areas, footpaths, pedestrian networks, cycleways transport routes and "other recreational routes", and recommends they are removed.

2) Clarifications in the new Policy NE1

Policy NE1 has been amalgamated from two previous policies and as such is muddled in places / confuses different issues within one policy area –and requires a number of amendments to ensure clarity, so the Plan can be understood and implemented effectively, and consistency with national policies. Although we understand the VALP is being inspected on the basis of the 2012 NPPF, the current NPPF (2018) provides a lot of the clarity required for this policy and so is used as justification.

25 October 2019

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.

See embedded document which provides suggested changes to the proposed main modifications that the NEP is commenting on.

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:

To outline the importance of the NEP's key concerns – particularly regarding

- **The revised definition of “Green Infrastructure” to include hard-standing surfaces such as market squares, civic spaces cycleways and transport routes.** These inclusions are NOT compliant with national policy (e.g. NPPF definition and PPG guidance) or generally-accepted definitions of green infrastructure at EU, national or local level policies or strategies. **Their inclusion in the definition is unsound and would risk perverse outcomes whereby “green” infrastructure provision requirements are met with provision of a hard-standing surface or market square.**
- **To clarify in person the nature of the changes proposed by the NEP at Policy NE1 –** there is some lack of clarity and detail in the modified policy and supporting text resulting from the amalgamation of two previous draft policies that existed in the previous draft VALP.

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)**