



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](mailto: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="Mr"/>
First Name	<input type="text" value="Matthew"/>
Last Name	<input type="text" value="Hayes"/>
Organisation (Where relevant)	<input type="text" value="FCC Environment"/>
Address Line 1	<input type="text" value="c/o Agent"/>
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"/>

### 2. Agent's Details (if applicable)

Title	<input type="text" value="Mr"/>
First Name	<input type="text" value="Stephen"/>
Last Name	<input type="text" value="Pickles"/>
Organisation	<input type="text" value="West Waddy"/>
Address Line 1	<input type="text" value="The Malthouse"/>
Address Line 2	<input type="text" value="60 East St Helen St"/>
Address Line 3	<input type="text" value="Abingdon"/>
Post Code	<input type="text" value="OX14 5EB"/>
E-mail Address	<input type="text" value="s.pickles@westwaddy-adp.co.uk"/>
Telephone Number	<input type="text" value="01235 523139"/>

## 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

MM070; MM071; MM072; MM073; MM074; MM075; MM076 all relating to the proposed allocation at Shenley Park

**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:**

*Continue onto another page if needed*

Please see attached sheets.

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

The allocation of Shenley Park is unsound. It would extend Milton Keynes beyond a firm landscape ridge and have significant adverse landscape impacts, particularly on the southern parcel where Milton Keynes would effectively coalesce with Whaddon village, adversely impacting upon the character of its Conservation Area. Alternative brownfield land is available on part of the FCC Environment land at Bletchley Road, north of Newton Longville, which was a former Brick Works. Redevelopment here would have a much lower environmental impact and could help preserve the separateness of Whaddon and Milton Keynes through a proportionate decrease in the size of the Shenley Park allocation.

**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.**

Allocate previously developed FCC Environment land at the former Brick Works in Bletchley Road, north of Newton Longville for up to 600 dwellings and make a proportionate reduction in the size of proposed allocation at Shenley Park, for the reasons outlined in the full representation.

**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:**

FCC Environment own the previously developed land at Bletchley Road, near Newton Longville and Bletchley, which is allocated in part for employment use development in the current Development Plan and has an extant consent for more employment use development on another part of the site. FCC wish to ensure that its full redevelopment potential is fully taken into account and realized in this new Local Plan.

**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)**

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## Privacy Notice for Vale of Aylesbury Local Plan (VALP) Main Modifications consultation

Aylesbury Vale District Council (AVDC) is committed to protecting your privacy when you use our services. The law requires us to give you a Privacy Notice which gives you details about how we use and protect your information.

### Our contact details are:

The Gateway, Gatehouse Road, Aylesbury, Buckinghamshire, HP19 8FF. Telephone: 01296 585858

Our Data Protection Officer is Mr Andy Barton. He can be contacted via [jbinning@aylesburyvaledc.gov.uk](mailto:jbinning@aylesburyvaledc.gov.uk) or telephone 01296 585495.

### What information will we collect about you:

- Name and address
- Contact details
- Job title/organisation (where relevant)
- Your comments/representations

### Why are we using your information?

We are asking for your information so that we can support the local planning process and creation of the Local Plan, including within the independent examination process. As a Local Planning Authority, the law requires us to carry out consultations for this purpose.

We can use your information because you have given us your permission to use it and we need to comply with the law. You may have rights to stop us using your information depending upon the stage of the local plan and the applicable legislation. If you want to check or stop us using your information you should email [localplanconsult@aylesburyvaledc.gov.uk](mailto:localplanconsult@aylesburyvaledc.gov.uk) and quote 'Vale of Aylesbury Local Plan consultations'.

If you do not give us your information or you stop us using your information (where possible) your comments or representation may not be taken into account within the local planning process and we may not be able to contact you with any follow up information on the plan's development, including the outcome of the independent examination.

Your information will normally be retained for the length of the plan period or until the plan is no longer in effect.

Your information is only used for the reasons above but if we need to use it for any other reason we will normally tell you.

### We may share your information with:

JDi Solutions who operate our online local plan consultation system for us. Your information is held in their system as result of representations you make, but only your name is published in relation to your representation. Importantly JDi Solutions are not permitted to do anything with your information other than provide it to us for our lawful use in relation to the preparation of the Local Plan

Once the consultation closes we are required by Regulations to share all valid and existing comments/representations with the independent Planning Inspector appointed by government to AVDC to undertake the examination. If the Inspector wishes to invite you to answer any follow up questions in response to your representation or invite you to attend any further public hearing for the purposes of the examination, we will share your contact information with the Inspector, via our appointed external Programme Officer, so he can contact you about the local plan.

**Please note that your name, organisation, system ID and representation will be made publically available. However your contact information will not be published in the report of representations and will be redacted if it appears in the body of your representation.**

### Automated Decision Making

We will not carry out any automated decision making. All decisions are made by a living person.

### Your rights

You have legal rights over your information. For details of those rights, how long we keep your information and how we keep it safe, see our main Privacy Notice on [Privacy Notice page](#)

If you have any concerns and/or complaints you may write to Jackie Binning, Data Governance Manager, on email [jbinning@aylesburyvaledc.gov.uk](mailto:jbinning@aylesburyvaledc.gov.uk) or telephone

## VALP Proposed Main Modifications – Representations on behalf of FCC Environment:

### Enter your full representation here:

Fundamental to a plan being justified and sound is that it is based on proportionate and up to date evidence that looks at reasonable alternatives (NPPF, paras 31 & 35). AVDC has singularly ignored this requirement, in allocating land at Shenley Park for at least 1,150 homes, 110-bed care home/extra care and associated services & infrastructure. This is a large greenfield site, currently in agricultural use, parts of which are highly sensitive in landscape terms. The Council's 'Landscape & Visual Capacity Comparison Assessment,' (2019), states that "*Development within the western part of the northern parcel would be seen as extending the development edge [of Milton Keynes] to within close proximity of Whaddon Conservation Area, to include Whaddon Hall. Development within the southern parcel would represent an unacceptable extension of development into the countryside and visible from the wider landscape,*" (para 5.1.25 of ED201A). Despite this negative assessment the Council has nonetheless decided to allocate the whole site for development, with the north-westernmost corner actually being contiguous with a part of the Whaddon Conservation Area. The effect of this allocation would therefore, if adopted, be to cause the coalescence of Milton Keynes with Whaddon and would also involve development crossing the landscape ridge that has hitherto defined the built-up edge of Milton Keynes. The Final Housing & Economic Land Availability Assessment (HELAA) version 4 (Jan 2017) also described the Shenley Park site as "*highly sensitive in landscape/visual impact terms so the scale, layout and form of development, will be very important,*" (Site ref: WHA001 p.253). Development of Shenley Park would result in the loss of an extensive area of greenfield land (99ha) that contributes to the character and beauty of the 'Whaddon Chase' countryside and is of some value for its agricultural use.

Despite the significant detrimental effects that would arise from this proposed allocation, the Council has not made any assessment of the potential of the FCC Environment land at Bletchley Road, near Newton Longville. This site is located adjacent to the southern edge of Bletchley town and a substantial part was formerly occupied by the Newton Longville Brickworks. Despite the fact that part of the former Brickworks site is allocated for employment-use redevelopment in the adopted Aylesbury Vale District Local Plan (AVDLP) (2004) and another part has an extant consent for further employment-use redevelopment, surprisingly, the Council state in their 2017 HELAA that it is: "*unsuitable - the site is in the open countryside separate from Newton Longville and Bletchley*" and states that "*development would be likely to have an adverse landscape & visual impact*" (Site ref: NLV029).

That assessment conclusion is unsound on three grounds:

1. The site is adjoined by a ribbon of ten residential properties fronting Bletchley Road, which were originally associated with the former brickworks, and have the character of an urban terrace extending south from the built edge of Bletchley town and the soon to be reopened East-West rail line connecting Bicester with Milton Keynes;
2. The Council has a long history of identifying the site as suitable for redevelopment. In 1995 the Council approved a Planning Brief for the Newton Longville Brickworks, which identified the former brickworks as having: "potential for employment development" and also stated that: "*this area could also be suitable for some low value/bad neighbour uses, provided they cause no significant nuisance to nearby residents*" (p14). Subsequently, in the Local Plan 2004, parts of the former brickworks were allocated for employment use under policy RA.34. Subsequently, the Council granted planning permission for erection of a single-storey modular office building with associated car parking and landscaping (15/00235/APP) on the southern part of the FCC Environment land; installation and use of a leachate treatment plant (09/20001/AWD); and planning permission has also been granted for the area adjoining its northern boundary for temporary use for a construction compound incorporating storage area, site offices and car parking (18/04521/APP) associated with the re-opening of East-West rail;
3. The FCC site does not have the character of countryside, as it contains the remains of the former industrial use including access roads & hard standings. It is also very well screened by mature trees,

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so is not visible from the countryside to the south or west and would not therefore have a detrimental landscape impact.

The assessment that the site is in the open countryside is therefore wrong. Indeed, this is confirmed by the Council's own assessment of what it refers to as NLV024 in its 2017 HEELA, which relates to the part of the FCC Environment land furthest from Bletchley and therefore most likely to impact on the character of the countryside. That assessment describes the NLV024 land as suitable for employment and acknowledges that it has granted planning permission for 645m<sup>2</sup> of employment in a modular office building in this location.

Unlike Shenley Park, the previously developed FCC Environment land in Bletchley Road is currently unused, so is not being used efficiently or most effectively. Therefore leaving it as it is would not accord with NPPF advice, which states that planning policies should: "*give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land*" (para 118 c) and to "*promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained,*" (para 118 d).

Despite the imperative need to make suitable use of the FCC Environment land opportunities at Bletchley Road, near Newton Longville, the Council has not undertaken any proper assessment regarding its redevelopment potential and has not been willing to engage with FCC Environment, despite the clear NPPF requirement for early, proportionate and effective engagement. In order to ensure that it was considered as part of any main modifications, FCC Environment made a site submission to the Council on 1st March 2019 and stated that they would welcome the opportunity to meet the Council to discuss the site. Further follow up letters were sent on 2nd April and 14th August 2019 requesting a meeting, and also enclosing an illustrative masterplan demonstrating how 600 dwellings could be accommodated on the FCC land. Council Officers have thus far declined to respond positively to FCC's approaches.

Given that FCC Environment had identified the land as available for redevelopment within 5 years and is ideally placed to meet identified needs in the local area, the site should have been assessed in the sustainability, transport, landscape, flooding, viability, ecology, water supply and heritage assessments that were subsequently undertaken on the Council's behalf in relation to the proposed main modifications and the Housing and Economic Land Availability Assessment Update 2019 (ED204; ED205; ED206; ED208; ED210; ED211; ED214; RED215; ED216; ED217 & ED222). Regrettably, no consideration was given to the site in any of these documents. It is acknowledged that the majority of the site is currently a Biological Notification Site. To achieve a net gain in biodiversity a large area would be left undisturbed to protect the underlying geology and biodiversity enhancement areas are proposed in the south-west and north-east corners of the site.

We note that the identified delivery of housing at Shenley Park is over the period 2024 – 2033. Over that period, we consider that there would be potential to deliver up to 600 dwellings at the FCC Environment Bletchley Road site, which would substantially reduce the amount of development needing to be provided on greenfield land at Shenley Park. Any such reduction in size of the Shenley Park proposal would help mitigate its landscape, transport and heritage impacts.

An illustrative masterplan of the potential development layout on FCC's land in Bletchley Road and how this could be delivered in three phases delivering in total up to 600 dwellings is attached.

It is therefore suggested that the amount of development at Shenley Park should be reduced proportionately by allocating the FCC Bletchley Road land, as identified on the attached illustrative masterplan, which would in turn:

- enable a landscape gap to be maintained, thereby preserving the separate identity of Whaddon and preventing coalescence with Milton Keynes;
- protect the character, appearance and setting of the Whaddon Conservation Area;
- significantly reduce the amount of greenfield development needed on the sensitive southern parcel

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of the Shenley Park site; and

- enable the unused previously developed FCC Environment land of the former Brick works to be brought back into active use.

Without these adjustments, we contend that the Plan is unsound as the proposed allocation of Shenley Park does not constitute “*an appropriate strategy, taking into account the reasonable alternatives, based on proportionate evidence*”, nor is it consistent with the NPPF in terms of making most effective use of land (para 35).



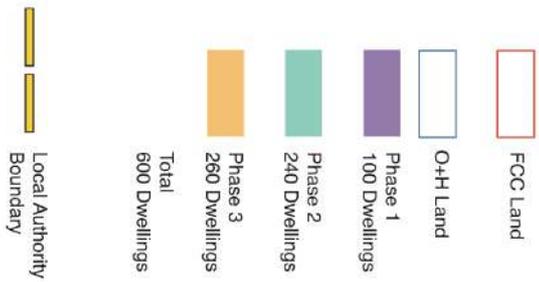
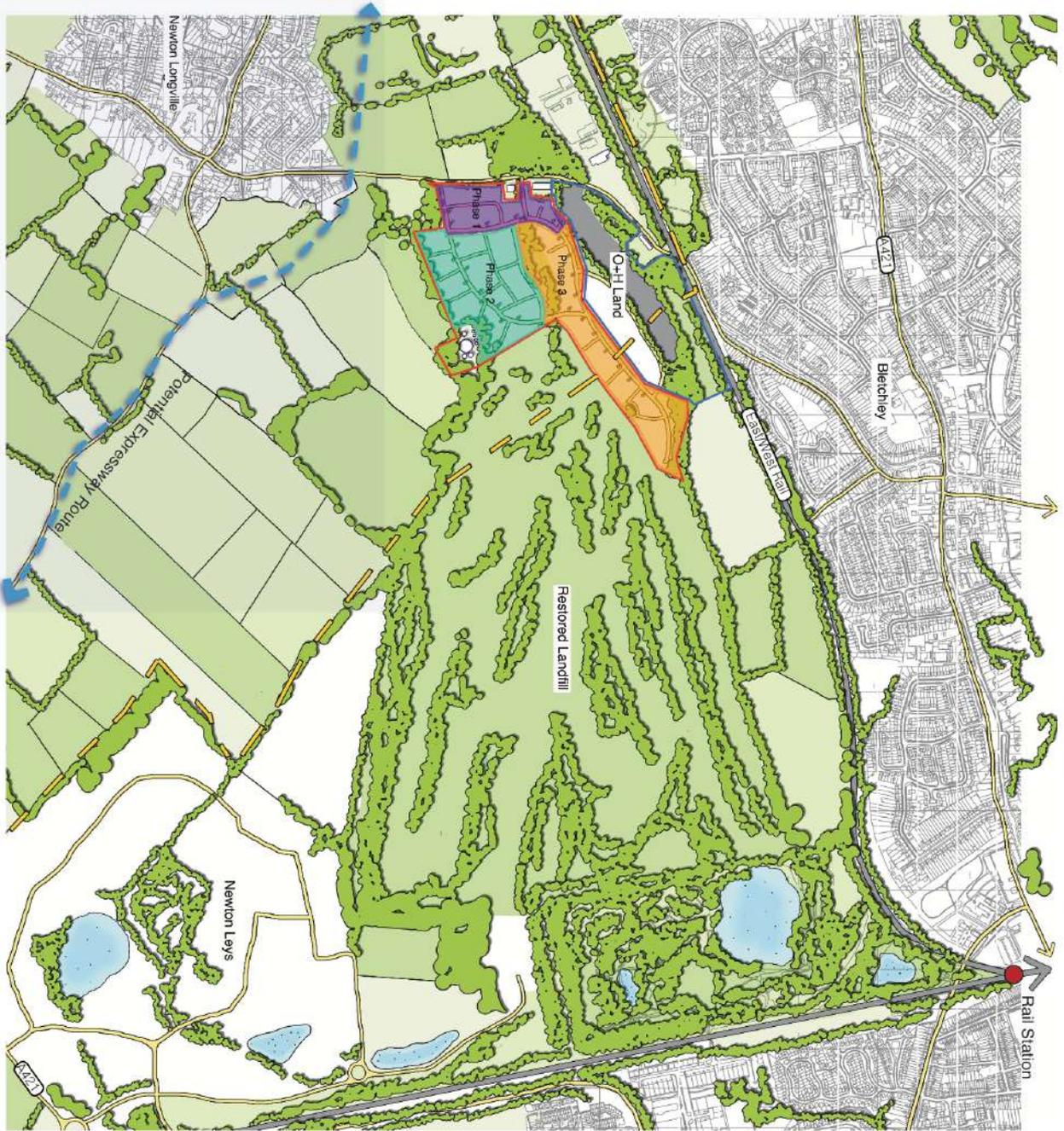
-  FCC Land
-  O+H Land
-  Biodiversity Enhancement Areas
-  Local Authority Boundary



land at Bletchley  
INTERIM MASTERPLAN



23-29-2019 12:08 INTERIM MASTERPLAN



Land at Bletchley  
Phasing Plan



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