
Report to Buckinghamshire Council

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an Inspector appointed by the Secretary of State

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Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

Report on the Examination of the Vale of Aylesbury Local Plan 2013-2033

A

The Plan was submitted for examination on 28 February 2018

The examination hearings were held between 10 and 20 July 2018 and 13-16 and 29 April 2021

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Abbreviations used in this report

AA	Appropriate Assessment
AAL	Area of Attractive Landscape
AECOM	Architecture, Engineering, Consulting, Operations and Maintenance. A multinational engineering firm
AONB	Area of Outstanding Natural Beauty
AVDC	Aylesbury Vale District Council
BC	Borough Council
CaMKOx	Cambridge-Milton Keynes-Oxford arc
CoStar	A commercial real estate information company
DCLG	Former Department for Communities and Local Government
ELR(N)	Eastern Link Road (North)
EZ	Enterprise Zone
FEMA	Functional Economic Market Area
HEDNA	Housing and Economic Development Needs Assessment
HELAA	Housing and Economic Land Availability Assessment
HGV	Heavy Goods Vehicle
HMA	Housing Market Area
HRA	Habitats Regulations Assessment
HS2	High Speed Two
IDP	Infrastructure Delivery Plan
LCA	Landscape Character Assessment
LLA	Local Landscape Area
LPEG	Local Plans Expert Group
LVIA	Landscape and Visual Impact Assessment
MHCLG	Ministry of Housing, Communities and Local Government
MK	Milton Keynes
MM	Main Modification
NHS	National Health Service
NIC	National Infrastructure Commission
NP	Neighbourhood Plan
NPPF	National Planning Policy Framework
OAN	Objectively Assessed Need
ONS	Office for National Statistics
ORS	Opinion Research Services. An independent social research practice
PPG	Planning Practice Guidance
Q	Question
RAF	Royal Air Force
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SEALR	South East Aylesbury Link Road
SEGRO	Slough Estates Group. A property investment and development company
SPD	Supplementary Planning Document
SSSI	Site of Special Scientific Interest
SWOT	Strengths, Weaknesses, Opportunities, Threats
VALP	Vale of Aylesbury Local Plan 2013-2033
WebTAG	Web-based Transport Analysis Guidance

Non-Technical Summary

This report concludes that the Vale of Aylesbury Local Plan [VALP] provides an appropriate basis for the planning of the former Aylesbury Vale District part of Buckinghamshire, provided that a number of main modifications [MMs] are made to it. Buckinghamshire Council has specifically requested that I recommend any MMs necessary to enable the Plan to be adopted.

The MMs all concern matters that were discussed during the examination, whether in hearings or by an exchange of correspondence. Following the hearings, the Council prepared schedules of the proposed modifications and carried out sustainability appraisal of them. The MMs were subject to public consultation over a six-week period. Representations identified further issues of soundness in response to which further modifications were prepared and subjected to sustainability appraisal, habitats regulations assessment and public consultation. In some cases I have amended their detailed wording and/or added consequential modifications where necessary. I have recommended their inclusion in the Plan after considering the sustainability appraisal, habitats regulations assessment and all the representations made in response to consultation on them.

The Main Modifications can be summarised as follows:

- Reducing uncertainty and the need for an early review;
- Policies and proposals to be stated in the plan rather than in SPD, IDP or other supporting documents;
- Reduced numbers of SPDs;
- Policy stated as policy rather than in supporting text;
- Clarification of role of Neighbourhood Plans;
- Amended Spatial Strategy and delivery policies and additional site allocation close to Milton Keynes (MK);
- Increased housing figures and revised delivery times;
- Revised policies on dwelling mix, on housing for older people and on accessible housing;
- Concise policy on agricultural workers dwellings;
- Refinements to town centre retail policy and sequential test;
- Refinements to tourist accommodation policy;
- Refinements to policy on provision for electric vehicles;
- Greater emphasis on heritage strategy;
- Rationalised policy on biodiversity and geodiversity;
- Enhanced policies on provision of green infrastructure and sports and recreation facilities;
- Clarification of transport proposals;
- Clarification of policy on water infrastructure provision; and
- A number of other modifications to ensure that the plan is positively prepared, justified, effective and consistent with national policy.

Introduction

1. This report contains my assessment of the Vale of Aylesbury Local Plan 2013-2033 in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is compliant with the legal requirements and whether it is sound. The National Planning Policy Framework 2012 (paragraph 182) makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.
2. The revised National Planning Policy Framework (NPPF) was published in July 2018 and further revised in February 2019 and July 2021. It includes a transitional arrangement in paragraph 214 which indicates that, for the purpose of examining this Plan, the policies in the 2012 NPPF will apply. Similarly, where the Planning Practice Guidance (PPG) has been updated to reflect the revised NPPF, the previous versions of the PPG apply for the purposes of this examination under the transitional arrangement. Therefore, unless stated otherwise, references in this report are to the 2012 NPPF and the versions of the PPG which were extant prior to the publication of the 2018 NPPF.
3. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The Vale of Aylesbury Local Plan 2013-2033 (the VALP), submitted in February 2018, is the basis for my examination. It is the same document as was published for consultation in November 2017, accompanied by a Schedule of suggested minor changes, needed post publication (February 2018), which reflect the correction of errors and amendments to procedural text to reflect the progression of the plan's preparation.
4. The Plan was submitted for examination by Aylesbury Vale District Council (AVDC) in February 2018. On 1 April 2020, under the Buckinghamshire (Structural Changes) Order 2019, the Districts of Aylesbury Vale, Chiltern, South Bucks and Wycombe were abolished as local government areas and the district councils which related to those areas were wound up and dissolved. In their place a new non-metropolitan district, Buckinghamshire, was established as the sole principal authority for this new, non-metropolitan district. In short, since 1 April 2020, Aylesbury Vale District Council has ceased to exist and Buckinghamshire Council has taken its place.
5. Under the Local Government (Structural Changes) (Transitional Arrangements) (No.2) Regulations 2008, where functions are now to be exercised by the successor council, anything done by the predecessor council (AVDC) in the exercise of its functions shall have effect as if done by the successor council (Buckinghamshire Council). Therefore, the preparation of VALP, undertaken by AVDC prior to 1 April 2020 is to be treated as having been undertaken by Buckinghamshire Council.
6. Furthermore, the regulations make provision for a prepared but as yet unadopted local plan to be adopted, with or without modifications, by the successor authority (Buckinghamshire Council). In this report, unless stated otherwise, the phrase "the Council" means AVDC up until 1 April 2020 and

Buckinghamshire Council thereafter but, in any event, the actions of AVDC in relation to the Plan prior to 1 April 2020 are to be regarded as having been undertaken by Buckinghamshire Council.

Main Modifications

7. Following the examination hearings, the Council prepared a schedule of proposed MMs and carried out sustainability appraisal and habitats regulations assessment of them. The MM schedule was subject to public consultation for six weeks (5 November 2019 to 17 December 2019). A number of representations were made which raised further issues of soundness, following which the Council prepared a schedule of further proposed modifications, also subject to sustainability appraisal and public consultation, extended to eight weeks over the Christmas period (15 December 2020 to 9 February 2021).
8. In accordance with section 20(7C) of the 2004 Act the Council requested that I should recommend any MMs necessary to rectify matters that make the Plan unsound and /or not legally compliant and thus incapable of being adopted. My report explains why the recommended MMs are necessary. The MMs are referenced in bold in the report in the form **MM1**, **MM2** etc, and are set out in full in the Appendix. For ease of identification, the numbering of the modifications approximates closely to the numbering used in the Council's published consultation documents but some have been merged, resulting in discontinuous numbering in places [MMs 15, 76, 78, 80, 119-147, 160-167, 172, 173, 182, 225-227, 229-231, 250-253, 258, 259, 263-267 are numbers not used]. Where the Council proposed a further modification which was not to a previously proposed modification, the numbering sequence is interrupted with lettered suffixes, A, B, C etc. In all cases, the text and paragraph numbers as proposed to be modified are those of the Plan submitted for examination in February 2018, not that of the Plan as Proposed to be Modified which was published by the Council in October 2019.
9. I have taken account of the consultation responses in coming to my conclusions in this report and in this light I have made some amendments to the detailed wording of the main modifications and added consequential modifications where these are necessary for consistency or clarity. None of the amendments significantly alters the content of the modifications as published for consultation or undermines the participatory processes and sustainability appraisal/habitats regulations assessment that has been undertaken. Where necessary I have noted these amendments in the report.

Policies Map

10. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the relevant changes are illustrated on a series of maps provided in section 13 of the submitted plan.
11. The policies map is not defined in statute as a development plan document and so I do not have the power to recommend main modifications to it. However, in this particular instance, the proposed changes are provided as a

series of plans and inset maps within the submitted Local Plan. As such, where changes are necessary for soundness, they are included in the schedule of main modifications appended to this report. Required adjustments are described in words in **MMs 284 to 303**. They were also shown on a series of maps which accompanied the main modification consultation exercises in November 2019 and November 2020.

12. Moreover, a number of the published MMs to the Plan's policies require further corresponding changes to be made to the policies map. In addition, there are some instances where the geographic illustration of policies on the submission policies maps is not justified and changes to the submission policies maps are needed to ensure that the relevant policies are effective.
13. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted policies map to include all the changes proposed in the Vale of Aylesbury Local Plan 2013-2033 and the further changes published alongside the MMs.

Context of the Plan

14. The Vale of Aylesbury Local Plan (2013 – 2033) is proposed to replace the saved policies of the Aylesbury Vale District Local Plan 2004. The new plan will sit with The Buckinghamshire Minerals and Waste Local Plan 2016-2036 adopted on 25 July 2019 and a number of Neighbourhood Plans to constitute the full development plan for the part of Buckinghamshire Unitary Authority which was formerly the Aylesbury Vale District. The former District was large (900 sq km) and mainly rural in character but its area forms part of a swathe of local authorities in Oxfordshire, Buckinghamshire, Bedfordshire and Hertfordshire which are experiencing some of the fastest housing growth rates in the country.
15. Aylesbury is by far the largest town in the former District. It was, and is, the county town. Its population was over 40% of that of the whole district, more than five times that of Buckingham, the second largest settlement. Other main settlements are Winslow, Wendover and Haddenham. Aylesbury dominates the southern part of the former District. The fast-growing city of Milton Keynes borders and economically dominates the northern part of the former District. The substantial twin town settlement of Leighton Buzzard and Linslade, almost as large as Aylesbury itself, abuts the eastern edge of the former District.
16. The southern part of the district contains substantial tracts of high quality landscape, including part of the Chilterns Area of Outstanding Natural Beauty (AONB), and is also partly within the Metropolitan Green Belt around London. Districts to the south of Aylesbury Vale have significant environmental constraints due to the AONB and Green Belt designations, which can affect the scale and type of development they can accommodate.

Public Sector Equality Duty

17. Throughout the examination, I have had due regard to the equality impacts of the Vale of Aylesbury Local Plan in accordance with the Public Sector Equality Duty, contained in Section 149 of the Equality Act 2010. This, amongst other

matters, sets out the need to advance equality of opportunity and foster good relations between people who share a protected characteristic and people who do not share it.

18. There are specific policies (S6 and H6) concerning specialist accommodation for the elderly, gypsies and travellers and accessible environments that should directly benefit those with protected characteristics. In this way the disadvantages that they suffer would be minimised and their needs met in so far as they are different to those without a relevant protected characteristic. There is also no compelling evidence that the plan as a whole would bear disproportionately or negatively on them or others in this category.

Assessment of Duty to Co-operate

19. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by section 33A in respect of the Plan's preparation.
20. The four former Buckinghamshire Districts (Aylesbury Vale, Chiltern, South Bucks and Wycombe), the County Council and the two Local Enterprise Partnerships (Buckinghamshire Thames Valley Local Enterprise Partnership and South East Midlands Local Enterprise Partnership) formed the Bucks Planning Group at an early stage of plan preparation. This supervised the joint commissioning of joint studies from 2014 onwards.
21. These defined the relevant Housing and Functional Economic Market Areas, Objectively Assessed Need for housing and economic development and the housing requirements for all four districts collectively and individually. They identified the need for VALP to take on board housing needs which could not be met elsewhere in Buckinghamshire. They also updated a previous study of Gypsy and Traveller and Travelling Showpeople Accommodation Needs and an assessment of the Green Belt. It is evident from the submitted plan itself, the representations submitted and the supporting documents, including the Duty to Cooperate Statement of Compliance, that these arrangements secured cooperation on strategic housing, economic, Gypsy and Traveller and Green Belt matters between the authorities involved.
22. Other authorities (Royal Borough of Windsor and Maidenhead, Slough Borough, South Oxfordshire, Cherwell, Dacorum) were engaged on these matters from time to time, with Memoranda of Understanding being signed at various times. In addition, a far wider range of authorities were consulted. The Council has participated in the Steering Groups of the Luton and Central Bedfordshire Strategic Housing Market Assessment and Housing Market Area Boundaries Study.
23. For Strategic Flood Risk Assessment and Water Cycle Studies a stakeholder Group of Buckinghamshire County Council, the Environment Agency and two Water Utility Companies were engaged with studies carried out in 2016 and 2017 in time to be taken into account in the Submission Draft plan published in November 2017. Regular quarterly meetings of the Buckinghamshire Flood Technical Management Group continue.
24. County-wide consideration of transport issues seems to have got off to a slower start, with phase 1 of the Countywide Local Plan modelling report being

published in July 2016, just before the consultation on Issues and Options for Aylesbury Vale in August and September 2016. The Aylesbury and Buckingham Transport Studies were published in January 2017 and Phases 2 and 3 of the Countywide Local Plan modelling report in March and August 2017, prior to the publication of the Proposed Submission version of the plan in November 2017. Countywide modelling continued to inform the preparation of the Modifications and Further Modifications with the publication of the Jacobs VALP Modelling – Countywide Local Plan Modelling Support, Phase 4 Report (May 2020).

25. Although many authorities outside Buckinghamshire are listed in the Council's Duty to Cooperate Statement of Compliance as Strategic Partners in this work, representations from Oxfordshire and Hertfordshire County Councils record disappointment that up to the end of January/beginning of February 2018 very little work on cross boundary transport impact had been undertaken. Oxfordshire asserted in its representation that it had not been involved in modelling and related transport discussions and was concerned that insufficient attention had been paid to its comment submitted on the Aylesbury and Buckingham Transport Studies.
26. But a Memorandum of Understanding between the Council, Wycombe and South Oxfordshire District Councils and Buckinghamshire and Oxfordshire County Councils postdates these representations. It is dated 26 February 2018, immediately prior to the submission of the plan on 28 February 2018. It records agreement to cooperate on matters concerning strategic transport networks, to consult on policies and proposals that affect the strategic network or which have cross boundary impacts and to work together on the identification and delivery of appropriate interventions. It specifically identified four issues for future work and so addresses the representations made earlier. It is therefore evidence that the five signatory authorities have engaged constructively on strategic cross-boundary matters as part of the duty to cooperate.
27. Notwithstanding the representation made by Hertfordshire County Council, a memorandum of Understanding with Dacorum Borough Council dated 23 February 2018 records the strategic modelling work being undertaken by both Hertfordshire and Buckinghamshire County Councils and records agreement that there are currently no duty to cooperate concerns on matters concerning strategic transport networks in their respective emerging Local plans.
28. The Council's Duty to Cooperate Statement of Compliance confirms that its work on Open Space, Sport and Recreation matters did not engage strategic partners. On wider strategic issues it claims active engagement with the Bucks and Milton Keynes Natural Environment Partnership and this can be seen in section 9 of the submitted plan. Representations from South Oxfordshire District Council and from Thame Town Council suggest that there is more to be done in relation to cross-border leisure and social infrastructure issues. Those representations confirm, in themselves, that cooperation has taken place, albeit that the outcome is a recognition of more work needed.
29. At a very late stage in the plan's preparation (February 2018), Memoranda of Understanding have been signed with Buckinghamshire County Council, Cherwell District Council, Chiltern District Council, South Bucks District

Council, Dacorum Borough Council, Milton Keynes Council, South Northamptonshire District Council, South Oxfordshire, Wycombe District Council. These record previous engagement and also provide agenda for future cooperation. Those with Cherwell and with South Northamptonshire record that there are no significant cross border planning issues which need to be addressed through the duty to cooperate. That with South Oxfordshire records agreement to take forward dialogue concerning playing pitch provision in South Oxfordshire in the context of growth being planned for in the next local plans for both districts and so addresses the representations noted earlier.

30. Representations to the Modifications from Milton Keynes Council demonstrate that the duty to cooperate is not the same as a duty to agree. Nevertheless, further modifications to the original modification have resulted from the interaction with Milton Keynes Council leading to the recommended modification [MM75]. This demonstrates that not only was the Duty to Cooperate discharged in the preparation of the plan but that dialogue has continued through the preparation of modifications and continues still, even though the formal Duty to Cooperate applied only to the preparation of the originally submitted plan.
31. Overall I am satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has therefore been met.

Assessment of Soundness

Main Issues

32. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings, I have identified nineteen main issues upon which the soundness of this plan depends. This report deals with these main issues. It does not respond to every point or issue raised by representors. Nor does it refer to every policy, policy criterion or allocation in the Plan. Nevertheless, all representations and all the evidence before me have been taken into account in reaching my conclusions on the examination of the plan, even if not specifically mentioned in this report.

Issue 1 – Whether the Spatial Distribution Strategy is sound

33. VALP's spatial distribution strategy is set out in policies S2 and S3 and associated Tables 1 and 2. The essence of its justification is set out in paragraph 3.14 of the plan and elaborated upon in paragraphs 3.19 and 3.20. It is proposed to focus the majority of growth in and around six strategic settlements, one of which (Milton Keynes) is outside but immediately adjacent to the District. These are said to be chosen to minimise the need to travel, optimising sustainable modes of travel, helping to deliver services and facilities needed and enabling an integrated and balanced approach to the provision of homes, jobs and leisure.
34. In principle, this is a strategy which focuses significant development in locations which are, or can be made, sustainable and is likely to result in the creation of an environment with accessible local services that reflect a community's needs and supports its health, social and cultural well-being. The

sustainability appraisal that has been carried out demonstrates this. I am therefore satisfied that the intent of the spatial distribution strategy accords with NPPF advice, in particular paragraphs 7, 17 (bullet 11) and 34. The Council accepted that its phrasing of policy S3, prescribing avoidance of new development in the countryside, was not intended to go beyond the advice of NPPF paragraph 17, bullet 5 and would be the subject of a Modification [MM14]. I agree that it is necessary for compliance with national policy.

35. As opposed to its principles, the sense of the application of the spatial strategy in practice can be seen by reference to the existing sizes of settlements, their new allocations for housing development and their expected development (including commitments) over the plan period¹:

Settlement	Population	allocation	development
• Milton Keynes	229,941 (outside district)	14%	8%
• Aylesbury	58,740 ² (41% of district)	60%	57%
• Buckingham	12,043 (7% of district)	7%	8%
• Wendover	7,399 (4% of district)	8% ³	4% ⁴
• Haddenham	4,502 (3% of district)	2%	4%
• Winslow	4,407 (3% of district)	5%	4%
• Larger villages	} 42%	{ 1%	7%
• Medium villages	} of	{ 2%	4%
• Smaller villages and other	} district	{ 0%	2%

36. Although Leighton Buzzard (population c37,000) immediately adjoins Aylesbury Vale on the east side of the district, the spatial strategy does not propose to take advantage of its facilities or connectivity by allocating sites for development there. Other things being equal, an allocation for development comparable to that of Buckingham might have been expected. Instead, the land in Aylesbury Vale which is contiguous to the built-up area of Leighton Buzzard is proposed as an extension to the Metropolitan Green Belt. As noted elsewhere, there is an apparent intention to limit the outward growth of Leighton-Linslade and there is no request from Central Bedfordshire Council

¹ Percentages are rounded so may not sum

² This figure represents the population of Aylesbury parish and so excludes contiguous built-up areas of Buckingham Park to the north-west, Fairford Leys to the west and built-up areas to the south of the town. An alternative figure, for an area which still excludes Buckingham Park but also includes the separated village of Bierton to the north-east of Aylesbury would be 71,977, 50% of the former district.

³ At Halton, outside but near to Wendover.

⁴ Ditto

for Aylesbury Vale to contribute to the growth of Leighton Buzzard so I have no reason to find this choice unsound; simply, worthy of remark. Following my examination of its housing requirements, the Council has considered the need to identify further development sites within Aylesbury Vale and has confirmed that it can meet its revised housing requirements without the need for development at Leighton-Linslade. Consequently I find that a strategy which omits any allocation of land at Leighton-Linslade is justified and sound.

37. Equally remarkable in this strategy are the disproportionate dominance of Aylesbury, the disproportionately small role of Milton Keynes and the disproportionately small role of villages.

Villages

38. The dominance of Aylesbury and the small role for villages is actually a moderation of policy compared with the previous local plan which concentrated 65% of allocations in and around Aylesbury. Nevertheless the strategy still represents a substantial proportionate shift of settlement away from rural locations towards urban centres.
39. The concern is that paucity of allocations and restrictive policies on growth in villages may be inconsistent with the strategic aim stated in paragraph 4.183 of the plan that communities continue to thrive and do not stagnate or go into decline. Part of policy D6 asserts that "local and village centres will be encouraged to grow and loss of essential facilities and businesses such as local shops, pubs and post offices will not be supported." Policy I3 also asserts that the Council will resist proposals for the change of use of community buildings (defined as including shops, post offices and public houses) and facilities for which there is a demonstrable need.
40. Although these policies are concordant with the NPPF, they face the tide of economic reality in rural areas, recognised in paragraph 2.8 of the Council's Settlement Hierarchy Assessment, September 2017 and so, need more than assertion if they are to be effective and deliverable. The Council's response to my Q1 indicates that their viability and deliverability in the context of paragraphs 4.122, 4.145 and 4.14 of the Plan, which seek to place restrictions on growth in rural villages, has not been tested.
41. Policy D3 of the Plan advises that new housing development at smaller villages will be supported where it contributes to the sustainability of that village, thus allowing for the possibility that additional population could provide additional demand to sustain ailing services or facilities. There is no equivalent provision in policy D2 applying to medium and larger villages. In the case of smaller villages, the limitation of each site to five dwellings or fewer (criterion (c) of the policy) would limit the benefit of any but cumulative effects. As noted elsewhere, this policy would preclude the application of policy H6 to secure the provision of affordable housing in small villages.
42. Evidence which the Council presented in response to my Q1 shows how the provision of net additional dwellings at larger and medium villages is set to rise significantly over the next five years or so. Commitments fall away after that period and only three of the twelve larger villages have any allocations thereafter listed in VALP table 2, though the Council's response to my Q1 asserts that nine of the twelve have either VALP or NP allocations.

43. I am not convinced that the large commitment to growth in Aston Clinton (32% of the growth in larger villages) is necessarily a sound reason to preclude further growth allocations in the longer term but it is at least an explanation. The Council also explained that it did not make allocations to villages where development was also happening elsewhere in the same parish (this applies to Stoke Mandeville as paragraph 4.142 of the plan explains).
44. Only six of the nineteen medium villages listed in VALP table 2 have allocations. One of those, taking 16% of the total development expected to take place in medium villages, is Maids Moreton. In many ways this village may be regarded as a part of Buckingham (local residents would disagree) with which the village is contiguous. This emphasises the minimal contribution to the development strategy which free-standing medium sized villages are expected to make. High percentages of commitments at Cheddington and at Stoke Hammond may offer an explanation for an absence of allocations in those particular cases. The omission of growth allocations in many of the other larger or medium villages does not even have that explanation.
45. Although policies D2 and D3 do not preclude growth in settlements on sites not allocated, supporting text in paragraphs 4.122, 4.145 and 4.154 appears to do so. Modifications are necessary to eliminate the inconsistencies, to allow continued growth even after the next five years or so and to comply with national policy set out in NPPF paragraph 54 [**MMs 79, 91 and 97**]. The Council also accepted that a modification to policy D2 to make it clear that it is in two parts is necessary for clarity (and hence, effectiveness). I agree with that and the need to redraft criterion (c) to remove internal inconsistency and to be consistent with the footnote of policy H2.
46. Although the HELAA process by which allocations were identified took account of the provision of facilities and services within each settlement, it did not take account of the potential for sites to contribute to the support or provision of such services or facilities. In similar fashion, the classification of villages into their position in the settlement hierarchy was based on a snapshot in time, recording facilities and services as they existed at a particular moment. It does not take into account the potential for settlements to acquire improved facilities or services as a result of development taking place or proposed to take place.
47. As a consequence there are many representations to the effect that the capacity of settlements has been underestimated or that the position of certain settlements within the hierarchy has been misplaced. For the most part, these contentions, insofar as they do not simply pursue the claims of "omission" sites, are marginal to the overall soundness of the spatial distribution strategy.⁵ Nevertheless they do indicate that it has imperfections.

⁵ For example, in response to my Q45, the Council acknowledges an error in the assessment of Weston Turville but correcting the error does not alter the village's overall position in the settlement hierarchy.

48. I understand and concur with the Council's point that a development which could make much difference to the services and facilities a village has to offer might well have to be so large that it would overwhelm the capacity of the village to accommodate the development. I also concur with the point made in response to my Q86 that a dispersed settlement strategy in which all of the Council's housing needs would be met in a dispersed way would be inappropriate as it would require dispersed infrastructure provision and a dispersal of and an increase in travel movements to access essential services which would not be an effective or sustainable approach.
49. The Council's capacity-led approach to identifying allocations received widespread support. I agree that it has more justification than arbitrary allocations based on existing settlement size. Nevertheless, in my Interim Findings, I did consider that further work needed to be done at the margins of this approach to ensure that the vitality of rural communities could be maintained or enhanced in the way envisaged by NPPF paragraphs 54 and 55.
50. I suggested firstly, identifying those allocations which could positively support the sustainability credentials of a particular village either where the prospects of continued retention of its services or facilities are marginal or where the capacity of its existing services and facilities to support further development are marginal. My second suggestion was to take account of that potential in the classification of villages within the settlement hierarchy (in other words, to take account of a settlement's need for further development in order to support services and facilities).
51. The Council points out that its evidence on commitments in villages does not include allocations in emerging or made Neighbourhood Plans but those of made Neighbourhood Plans are included in table 1 of the plan on which my table above is based. The Council's proposed modification to policy D4 **[MM107]** is consistent with its approach and is necessary for clarity but does not specifically address an issue of substance. My analysis, discussed elsewhere, of the relationship between VALP and Neighbourhood Plans shows that, although the relationship is sound, VALP does not give much incentive for further Neighbourhood Plans to come forward. In my view, to give Neighbourhood Plans for villages the explicit task of identifying development opportunities which would sustain or improve their position in the development hierarchy would go some way towards alleviating the concerns I have about the role of villages in VALP's spatial distribution strategy.
52. In the event, Modifications to Table 2 and policy D2 proposed in November 2019 in response to other of my recommendations reflect the passage of time in which decisions made on planning applications increase the total development in large and medium villages by 16-17%. The further modifications which the Council put forward in November 2020 indicate a still greater effect of that phenomenon.
53. This outturn, reflected in the revised modifications to table 2 and policy D2 which I now endorse for other reasons explained below **[MMs 10, 11, 12, 14 and 79]** vindicates my acceptance of the Council's view that it would not need to pursue further allocations in villages in order to reach a more balanced Spatial Strategy. Although the Council reports that it is undertaking a review of development proposals on unallocated sites relating to villages, the level of

new housing required to meet the district's revised housing needs can be met by further allocations in close proximity to Milton Keynes. Consequently, no specific modification to the Spatial Development Strategy in respect of villages is necessary for the plan to be found sound.

North and south

54. An arbitrary line dividing the District into two areas more or less equal in geographic extent shows that the northern half of the district is expected to receive 24-28% of the housing development expected (commitments and allocations) during the plan period and the south 72-76%⁶. But the existing distribution of the population in the district is not evenly divided. The Milton Keynes Housing Market area⁷ extends over about half of the north of the district and encompasses about 16% of the existing population. The other half of the north of the district (within the Oxford housing market area) is even less densely populated. It follows that the approximately 1:3 ratio in the distribution of future development reflects the existing population distribution and so is not necessarily unsound.
55. Moreover, just under 30% of the housing development envisaged in the plan period is intended to accommodate demand displaced from districts to the south of Aylesbury Vale so it may be expected that a higher proportion of development should be allocated as near as possible to the source of demand. Therefore I conclude that the 24-28% of development expected to occur in the northern half of the District is not disproportionately low or unsound, although it is fair to observe that analysis of the housing trajectory shows that delivery in the north of the district peaks in 2023/4, then tails off, with no allocations expected to deliver towards the end of the plan period⁸.

Milton Keynes

56. What is surprising is that within the northern half of the district the roles of Buckingham, Winslow and Milton Keynes are relatively equal in the anticipated distribution of development. Milton Keynes, the dominant settlement, is not expected to dominate the development strategy. This contrasts with the south of the district where the strategy concentrates most development around the dominant settlement, Aylesbury. Yet all three of the northern settlements lie within the Milton Keynes Travel to Work Area.
57. Whilst accepting that the Buckingham and Winslow Neighbourhood Plans seek to make those towns much more self-contained communities and recognising the point made in an earlier paragraph that all settlements must be allowed to grow to retain their vitality and viability, the contrast between the north of the

⁶ The range of figures represents the differences between evidence given in representations and the evidence given in hearing statements.

⁷ As defined in 2015; subsequent redefinitions largely removed the Oxford HMA from covering any part of the Aylesbury Vale District

⁸ See figure 4.1 of Technical Appendix 6 of representation 2016 by Savills on behalf of Crest Strategic Projects (respondent number 27869)

district where the dominant settlement is not allowed to dominate the development strategy and the south of the district where the dominant settlement is encouraged to dominate the development strategy is startling. It is hard to escape the conclusion expressed by several representations that the spatial strategy in the north of the district would lead to increased lengths of commuting flows to and from Milton Keynes.

58. This would be contrary to national policy expressed in paragraph 34 of the NPPF which advises that plans should ensure that developments which generate significant movement are located where the need to travel will be minimised. It is therefore unsound. For reasons which are stated elsewhere in this report, I reach the conclusion that insufficient land has been identified for housing and that additional allocations need to be made. This inevitably means revisiting the decision which led to the spatial development strategy known as option 3 in the Sustainability Appraisal being selected for VALP and so gives rise to an opportunity to redress the balance of the chosen spatial development strategy in the north of the district.
59. Modifications to the plan are required to redress the balance, by increasing allocations in close proximity to Milton Keynes **[MMs 7, 10, 11, 12, 70, 71, 75 and 77]**. The Council's response to this finding generated considerable controversy which led to me holding a further hearing session on the subject. I discuss this in another section of my report. These modifications have been adjusted following consultation on further modifications proposed by the Council so as to respond to representations made, taking on board all such of Milton Keynes Council's suggestions as can presently be justified with evidence.

Aylesbury

60. The part of the spatial distribution strategy which involves a concentration of large allocations around Aylesbury town received criticism on two counts; (a) that it is undeliverable because it would saturate the local market and; (b) that it contradicts the findings of an Inspector examining the (subsequently withdrawn) Core Strategy in 2010. I deal with the latter point first.

2010 – a spatial odyssey

61. That Inspector's preliminary findings⁹ were that the growth arc to the east of Aylesbury then proposed did not represent the most appropriate strategy when compared with alternatives. In the currently submitted plan the Council appears to have taken this observation on board by omitting an allocation to the north-east of Aylesbury and adding southern and eastern allocations.
62. In detailed comments the Inspector in 2010 observed that the Aylesbury South East site (then referred to as site D) was the best performing element of all proposals and should be included in any strategy. This is understood to equate to allocation AGT4 in the submitted plan. The Inspector then described

⁹ There was no final report because the Core Strategy was withdrawn

it as a sustainable urban extension and noted that there would be limited landscape, heritage, biodiversity or flooding impacts. He went on to comment that similar comments apply to south and south-west sites (then referred to as sites E and F and apparently not included in the Aylesbury Growth Arc proposals of 2010). These are understood to correspond to sites AGT1 and AGT2 in the now submitted plan.

63. In later passages, the 2010 Inspector recorded that he considered the North East site (then referred to as C) to be the most sensitive, where the Aylesbury Growth Arc proposals would have the most harmful effect. This site is not included in the current plan's allocations. He commented that the East site (understood to be allocation AGT6 in the current plan) has some attractive elements but that the overall quality of the landscape is not significantly different from the SE, S and SW sites and does not preclude its development.
64. In a later passage, the Inspector in 2010 commented that the proposed Eastern Growth Arc would have a very serious impact on Bierton and Broughton Crossing, with a very real danger that the new development would swamp the existing settlements, despite any green buffers. Paragraphs 6.5.11 and 6.5.12 and the Technical Annex of the Sustainability Assessment Report describe the consideration which was given to these and other matters before selecting the option of including allocation AGT3 within the plan's spatial strategy in preference to the north-eastern major development area which is omitted from the currently submitted plan. The 2010 Inspector identified similar issues for the southern arc (now AGT1, 2 and 4) but observed that by their nature the larger settlements affected, e.g Stoke Mandeville and Weston Turville, would remain as significant entities and have greater critical mass to withstand overpowering encroachment.
65. The Inspector in 2010 requested the Council to investigate combining the SE site (AGT4) with a site at Fleet Marston and one unidentified other, though he did caution that he would need to see the outcome of that further work before reaching a firm conclusion about the most appropriate way to meet the requirement for substantial housing growth at Aylesbury. He acknowledged both advantages and disadvantages associated with the Fleet Marston option in terms of access and noted that it would be likely to be seen as an isolated new settlement in open countryside.
66. In the event two sites at Fleet Marston were considered in the HELAA (reference FLM001 and FLM002). One was assessed as unsuitable on grounds of landscape, heritage and transport. The other was assessed as unsuitable because of HS2 safeguarding, flood risk, landscape and biodiversity. VALP does not include these sites. Instead it includes allocation AGT3, comprised of a number of sites variously assessed in the HELAA as suitable, partially suitable or not suitable but where the elements of unsuitability (largely flood risk) are said to have been addressed.
67. The above narrative demonstrates that the strategy of the submitted VALP in terms of the distribution of allocations around Aylesbury is not inconsistent with the 2010 Core Strategy inspector's findings and so is not unsound on that ground. The various allocation proposals include measures to avoid coalescence with existing settlements and so are made consistent with the

anti-coalescence provisions of policy S3. In other sections I consider the soundness of individual allocations in detail.

Market saturation

68. Many representations express concern that the strategy of concentration of development in Aylesbury presents a high risk of market saturation, because it relied on 60% of the purchasers of new housing in the District to buy in Aylesbury itself. But none offered any advice on how to determine whether this would, in fact, be the case. Those who expressed the concern accepted that the evidence¹⁰ showed no sense of finite market capacity in Aylesbury.
69. It was also suggested that the best guide is past performance. As the Council points out, past performance has begun to exceed expectations at the Berryfields and Kingsbrook developments in Aylesbury. I conclude that the fear of market saturation is not a reason to find VALP unsound.

Conclusion on spatial strategy

70. With the modifications recommended, the spatial distribution strategy would be justified and effective, and so, sound.

Issue 2 – Whether an addition to the Green Belt is justified to the west of Leighton-Linslade.

71. Paragraphs 82 to 84 of the NPPF set out the national position on defining new boundaries. Relevant guidance therefore makes it clear that the Green Belt is a strategic planning tool designed primarily to prevent the spread of development and the coalescence of urban areas. To this end, land should be designated because of its position, rather than its landscape quality or recreational use.
72. The Framework requires, and Case law has consistently confirmed, that Green Belt alterations require 'exceptional circumstances' to be demonstrated by the local planning authority. For example the judgement in *Gallagher Homes Ltd v Solihull Borough Council* ([2014] EWHC 1283 (Admin), Hickinbottom J) cited the considerable amount of case law on the meaning 'exceptional circumstances' and concluded that "it is not arguable that the mere process of preparing a new Local Plan could itself be regarded as an exceptional circumstance justifying an alteration to a Green Belt boundary". Case law also confirms that decision-makers should take into account the consequences for sustainable development of any review of Green Belt boundaries, including patterns of development and implications for additional travel.
73. Although the mere process of preparing a new Local Plan is not, of itself, an exceptional circumstance which justifies an alteration to a Green Belt boundary, paragraph 83 of NPPF (2012) advises that at the time of preparation or review of the Local Plan, authorities should consider the Green

¹⁰ Wessex Economics Housing Delivery Study for Buckinghamshire, August 2017

Belt boundaries having regard to their intended permanence in the long term. The construction of the A4146 Leighton by-pass road is cited by the Council as the exceptional circumstance justifying the occasion of the review and alteration.

74. The Council's Green Belt Topic Paper offers three reasons for the proposal to designate additional Green Belt land at the twin towns of Leighton Buzzard and Linslade (Leighton-Linslade). One is to help balance the loss of Green Belt in other areas, including elsewhere around Leighton Buzzard. Another is to provide a more recognisable boundary than the present County and District boundary. A third is to complete Green Belt protection on all sides of Leighton-Linslade.
75. The first two of these reasons are not good or sound reasons for designation of a piece of Green Belt because there is no requirement for a fixed quantity of Green Belt land to be designated¹¹ and because the current administrative boundary, following a ridgeline, is already sufficiently recognisable. The third reason was explained more fully during a hearing session by the fact that different administrative authorities had different timescales for delineating the Metropolitan Green Belt.
76. The Central Bedfordshire and Luton Green Belt Study of November 2016 explains that the adoption of the Bedfordshire County Structure Plan in 1980 gave the Green Belt statutory force. Its purpose was to contain the outward growth of Luton, Dunstable and Houghton Regis; Leighton-Linslade; and Ampthill and Flitwick and prevent the coalescence of settlements within that area. These latter are all settlements to the east of Leighton-Linslade and so the risk of coalescence does not apply to its west side but the purpose of containing the outward growth of Leighton-Linslade remains on all sides.
77. The Central Bedfordshire and Luton Green Belt Study adopted an assessment framework based on the first four of the five bullet points of NPPF paragraph 80 and adopted all four in relation to Leighton-Linslade. It makes some recommendations for adjustments to remove Green Belt designation from small parts within Central Bedfordshire of the two cross-border parcels which are considered in the VALP Green Belt proposals but finds that for the most part they continue to make a strong contribution to the purposes of the Green Belt. These recommendations are taken forward in the submitted local plan for Central Bedfordshire.
78. Although recent planning history demonstrates that normal planning and development management policies are adequate to protect the landscape significance of the two land parcels in question, the evidence described in the two preceding paragraphs, prepared by each of the local authorities on either side of the administrative border, convinces me that there is a necessity for

¹¹ NPPF (2012) is silent on the matter but paragraph 138 of NPPF (2019 version) advises that when land is released from the Green Belt, the impact is to be offset by compensatory improvements to the remaining Green Belt land. It does not suggest any need to designate an equivalent amount of new Green Belt land.

the Green Belt and that the proposal within VALP would be consistent with Local Plans for adjoining areas.

79. Paragraph 5.58 of the Report of Findings of Housing Market Areas and Functional Economic Market Areas in Buckinghamshire and the surrounding areas (March 2015) records that Leighton Buzzard's retail catchment extends into Aylesbury Vale. The town is recognised on VALP's District Key Diagram as a Neighbouring Settlement. It is therefore appropriate to consider what the consequences of the proposal to designate additional Green Belt would be for sustainable development as it would limit the outward growth of Leighton – Linslade into Aylesbury Vale.
80. In the past, the location west of Leighton-Linslade has been recognised in general terms as an appropriate location for growth.¹² But it has since been considered and rejected as a location for growth by Central Bedfordshire District Council preparing its Development Strategy in 2012 (subsequently withdrawn). There is no request from Central Bedfordshire for VALP to accommodate any of the housing or other growth requirements of Leighton-Linslade which are apparently proposed to be met within Central Bedfordshire itself, in part by the implementation of the Central Bedfordshire and Luton Green Belt Study already noted.
81. On the information currently before me there is no consideration which would lead me to conclude other than that the proposed extension of Green Belt into Aylesbury Vale is soundly based. As noted above, in accordance with government policy, the preparation of the Local Plan is when local authorities should consider their Green Belt boundaries. The termination of the Green Belt at the County boundary was a happenstance resulting from the different timescales of plan production in different administrative areas; the extent of designation in Aylesbury Vale represents unfinished business. That is the exceptional circumstance which justifies a review of the boundary.
82. Construction of the A4146 Leighton by-pass is a further circumstance justifying the occasion for review. Although, as explained earlier, the new boundary suggested by the road does not of itself justify the designation of additional green belt land, it provides a clearly defined, defensible boundary for the addition of land which is justified for other reasons. Following my examination of its housing requirements, the Council has considered the need to identify further development sites within Aylesbury Vale and has confirmed that it can meet its revised housing requirements without the need for development at Leighton-Linslade. Consequently, I find that the designation of additional Green Belt land to the west of Leighton-Linslade would have long-term permanency and so is justified and sound.

¹² In proposed modifications to the South East Plan published for consultation in 2008, in the Aylesbury Vale Core Strategy submitted for examination in 2009 (and subsequently withdrawn)

Issue 3 – Whether housing needs would be effectively met.

Housing Market Area

83. Paragraph 47 of the NPPF advises that local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area. It does not advise that local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in its local authority area. Yet, apart from combining the Aylesbury Vale local authority area with those of Wycombe, Chiltern and South Buckinghamshire, that is what the evidence base for VALP effectively does by using local authority boundaries as a surrogate “best fit” Housing Market Area for the collection of data and for calculating Objectively Assessed Needs.
84. Housing Market Areas do not have finite boundaries; they are best conceived as zones of influence which both overlap and change over time and according to the geographic scale of market being considered so that, for example, it is sometimes possible to discern several local housing market areas within a larger regional housing market area.
85. National Planning Practice Guidance advises that need for housing refers to the scale and mix of housing and the range of tenures that is likely to be needed in the housing market area over the plan period¹³. Needs are rarely constrained precisely by local authority administrative boundaries.¹⁴ Needs should be assessed in relation to the relevant functional area, ie housing market area¹⁵. For housing, where there are issues of affordability or low demand, house price or rental level analyses will be particularly important in identifying the assessment area¹⁶. A housing market area is a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work¹⁷.
86. The inference is that different housing market areas have different characteristics. Guidance advises that the definition of housing market area boundaries enables the identification of areas which have clearly different price levels compared to surrounding areas¹⁸. In response to a question, the Council's consultant advised that the risk of wrongly defining the Housing Market Area affected the adjustments and uplifts included in the Objectively Assessed Need to reflect the alignment of jobs and workers and market signals.

¹³ Guidance paragraph 003 Reference ID: 2a-003-20140306

¹⁴ Guidance paragraph 007 Reference ID: 2a-007-20150320

¹⁵ Guidance paragraph 008 Reference ID: 2a-008-20140306

¹⁶ Guidance paragraph 009 Reference ID: 2a-009-20140306

¹⁷ Guidance paragraph 010 Reference ID: 2a-010-20140306

¹⁸ Guidance paragraph 011 Reference ID: 2a-011-20140306

87. From the evidence available, it is clear that in recent times, Aylesbury Vale District has been pulled between three or four sub-regional housing market areas. A study in 2015, largely based on commuting flows and travel to work areas, confirmed a 2004 study that (in terms of geography, not population) the district was fairly evenly divided between HMAs based on Oxford, Milton Keynes and Central Buckinghamshire with a significant influence from a Luton centred HMA. A later study of June 2016, pulling more recently released fine-grain migration data from the 2011 census discounts the influence of Oxford and concludes that, in terms of population, about 80% of the Aylesbury Vale District fell within the Central Buckinghamshire Housing Market Area. Office of National Statistics studies on travel to work areas shows a parallel shift in the relative influence of Milton Keynes, Oxford and High Wycombe on Aylesbury.
88. Whilst I have no doubt that the identification of the Central Buckinghamshire HMA as the "best fit" for the collection and analysis of data is the most pragmatic administrative arrangement, it is necessary not to lose sight of three facts;
- Actual housing markets continue to function irrespective of whatever surrogate HMA is chosen for the basis of data collection and analysis.¹⁹
 - Approximately one-fifth (in terms of population) and about one-third (in terms of area) of Aylesbury Vale District falls outside the "best fit" HMA and so is likely to experience the market forces of a different HMA to that analysed in the evidence base.
 - The identification of self-contained travel to work areas using 2011 census data showed that the majority of Buckinghamshire (and Aylesbury Vale) outside the influence of Milton Keynes forms part of a London travel to work area and that the influence of London had to be excluded in order to define the local housing market areas outside its influence.²⁰ Nevertheless, in practice that influence will remain.
89. For these three reasons I would have expected specific checks and adjustments to be made to the calculations based on the "best fit" HMA analysis to reflect the influence of the London Housing Market area on the part of Aylesbury Vale so affected and also to reflect the different characteristics of the Milton Keynes HMA in the part of Aylesbury Vale which falls outside the Central Bucks (and London) Housing Market areas and within the Milton Keynes HMA. Other than a general exhortation of the need for Aylesbury Vale District Council to maintain dialogue with Milton Keynes, Oxford and areas to the north of London as well as the Mayor of London through the Greater London Authority, these checks and adjustments do not appear to have been made.

¹⁹ See paragraph 24 of the Executive Summary of the 2015 report *Housing Market Areas and Functional Economic Market Areas in Buckinghamshire and the surrounding areas* and paragraph 9 of the Council's Response to my initial questions on the HEDNA.

²⁰ Ibid, paragraphs 3.8 and 3.10 and figure 18

90. In response to my specific question during the hearing sessions, the Council's consultant, who is also the consultant to Milton Keynes Borough Council on similar matters, advised me that there may be a case to make different adjustments for different market areas, giving as an example the different uplift for market factors recommended between VALP and Wycombe Local Plan. He commented that there is alignment between MK and Aylesbury Vale in terms of labour force and affordability but accepted that the comparison had not been specifically tabulated within the evidence base. In his view the recognition of Milton Keynes as a separate Housing Market Area is a matter for the spatial distribution strategy rather than OAN adjustments.
91. In this report, I have accepted that advice and conclude that the identification of the Central Buckinghamshire HMA as the "best fit" for the collection and analysis of data provides a sound basis for the evidence to show that housing needs would be effectively met. I recommend modifications to the spatial distribution strategy so as to recognise the effects of Milton Keynes as a separate Housing Market Area.

Demographic projections

92. National Planning Practice Guidance recommends the use of a standard methodology to assess housing need.²¹ It advises that household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need.²² These suggest that household numbers across the defined Central Buckinghamshire Housing Market Area will increase by 42,772 from 2013 to 2033 (the plan period). These would place Aylesbury Vale within the top 10% of all local authorities in England in terms of population growth with a figure more than double the average. That does not necessarily make the projections incorrect but it has caused the Council to scrutinise them closely.
93. Guidance advises that the household-based estimates may need adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends.²³ Plan makers may consider sensitivity testing, specific to their local circumstances, based on alternative assumptions in relation to the underlying demographic projections and household formation rates.²⁴
94. The Council argues that errors in the 2001 census have led to distortions in the components of change data used in the population projections which underlie the household projections. In contrast to the adjustments which the Council made to the household projections in its withdrawn Vale of Aylesbury Plan which attracted criticism from the examining Inspector at the time for attributing 100% of the unattributable component of change to migration with insufficient evidence, the evidence base now finds that approximately 3,400 of

²¹ Guidance paragraph 005 Reference ID: 2a-005-20140306

²² Guidance paragraph 015 Reference ID: 2a-015-20140306

²³ Guidance paragraph 015 Reference ID: 2a-015-20140306

²⁴ Guidance paragraph 017 Reference ID: 2a-017-201403036

the 5,855 unattributable population change can be explained by errors in the census estimates.²⁵

95. The overall effect of the adjustments made by the Council to the population projections is to smooth the annual rate of growth in contrast to official figures which show an accelerated rate of growth 1991-2001 followed by decelerated growth 2001-2011. This fluctuation was not paralleled by housing completions. The Council, advised by its consultants, found this implausible. I concur. A comparison of the rate of increase in population indicated by the Mid-Year Estimates from the Office of National Statistics with the increases in population indicated by changes in the NHS patient register, by changes in the school census and by changes in the recipients of the state pension suggests that errors in the calculation continue to lead to an exaggeration in the mid-year estimates and so the Council makes an adjustment to these as the basis of its projections.
96. Notwithstanding the advice contained in national Guidance that the official household projections are statistically robust and the concerns expressed by representations that the official statistics have a quality assurance which the Council's figures do not offer, I am satisfied that the reasons advanced by the Council for departing from them in arriving at the starting point for its projections are adequately explained and robustly defended against critical analysis. They fall within the circumstances described by Guidance in which adjustments can legitimately be made to household projection-based estimates of housing needs. Nevertheless, although I am convinced by the Council's explanations of its adjustments to the population estimates at the start of the projections I am not fully convinced by the Council's figures in every respect.
97. In contrast to official projections which are based on recent (five-year) migration trends, the Council's projections are a range based on two ten-year trends, one more robustly founded on census data 2001-2011, the other based on more recent data 2005-2015. The Council adopts the higher of the two as the basis of its housing need for the plan period.
98. The Council bases its calculations on a ten-year migration trend because that is considered to iron out short term fluctuations to produce projections which are more stable. That is sound practice, with which I do not quarrel. But, the particular ten-year period used, whether 2001-2011 or 2005-2015, includes the years following the financial crisis of 2008 which are commonly recognised to be, not a short-term fluctuation, but a major interruption to long-term trends which will have depressed the average migration rate for whatever period includes the fall-out of that event.²⁶ This is not a point taken into

²⁵ Buckinghamshire housing and Economic Development Needs Assessment Update 2016, paragraph 3.34

²⁶ This is graphically demonstrated by the two graphs (Figures 1 and 2) in representation 1109 from Nexus Planning on behalf of respondent 32288 Inland Homes and Western Mead Farms.

account in the various appeal decisions and reports referred to during the examination and which accepted the Council's forecasts²⁷.

99. I am therefore not convinced that sufficient migration has been accommodated within the Council's forecasts for the Central Buckinghamshire Housing Market Area.
100. To some extent, migration is a self-fulfilling prophecy, in that the supply of housing can induce migration²⁸ within a given travel to work area. Given the identified relationship between the Central Buckinghamshire Housing Market Area as defined, the wider London Housing Market Area with which it overlaps and the Milton Keynes Housing Market Area which prevails in the northern part of Aylesbury Vale district, this consideration is likely to be relevant to Aylesbury Vale.
101. Because there is little objective evidence submitted to the examination on which to base a precise alternative figure for migration, I have not required the Council to re-run its population and household projections for the whole of the Housing Market Area on different migration presumptions. Instead I prefer to treat such adjustments for additional migration as a "policy on" consideration and to "wrap up" the effects of this consideration when taking into account the effects of other uplifts in the calculation of housing requirements for Aylesbury Vale, so that, in effect, additional migration figures become more of an output from the process than an input to it.
102. The VALP evidence base separates out the institutional population in accordance with standard practice before applying a conventional factor to convert population to household rates and applying factors for concealed families and homeless households, second homes and vacant dwellings to arrive at a baseline housing need figure of 40,457 for the Central Buckinghamshire HMA based on demographic projections (17,719 for Aylesbury Vale alone). With the caveat expressed above, I accept the robustness of these adjustments.

Uplifts

103. To this baseline housing need figure is added an uplift to reflect the need for housing for the number of employees expected to arise from economic

²⁷ Report APP/J0405/V/16/3151297 paragraphs 132-135, decision APP/J0405/W/16/3142524 paragraph 18, report APP/J0405/W/15/3137920 paragraph 13.25 and decision APP/J0405/W/17/3175193 paragraphs 22-27

²⁸ Comment made by Mr Lee in hearing session 15. It is noticeable that the surge in migration from Greater London to Aylesbury Vale following 2011, recorded in figure 3.2 of representation 1614 by respondent number 29523 Regeneris Consulting on behalf of Gladman Developments Ltd coincides with the recorded uplift in Aylesbury Vale's delivery of housing from 2011/12 onwards recorded in figure 3.6 of the same document. The parallel between increased population growth and increased housebuilding is also noted in paragraph 3.48 of the Buckinghamshire Housing and Economic Development Needs Assessment Update 2016. It is also noted in paragraph 2.1.21 of Examination document 134; Response to ED108.B by Pegasus Group on behalf of Cala Homes Ltd.

forecasts or from market signals for affordability, whichever is the higher. For Aylesbury Vale, the higher figure is the labour force uplift of 10% but for the rest of the housing market area and for the HMA overall it is the market signals for affordability. The full objectively assessed need for housing 2013-33 is then 46,042 for the Housing Market Area, 19,385 for Aylesbury Vale (rounded to 46,200 and 19,400).

104. There are three points to be made in relation to these uplifts. The first is that, as recognised in the evidence base, market forces in the commercial property market for Aylesbury Vale do not appear to be reflecting the economic forecasts and so the uplift to meet the needs of the labour force may be unreliable. However, the uplift which the evidence base calculates in relation to market signals is of a similar scale, so the plan would not be made unsound because of the labour force uncertainties.

105. The second point is that, at the time the evidence base was prepared there was no definitive guidance on what level of uplift for affordability is appropriate. Reference is made to professional judgments made by other examining Inspectors such as at Eastleigh and comparisons made between affordability in Eastleigh and affordability in the Central Buckinghamshire Housing Market Area to arrive at a recommendation for the Central Buckinghamshire HMA. Comparisons are also made within the Buckinghamshire HMA to arrive at different recommendations for Aylesbury Vale and for the rest of the HMA.

106. But it is clear that if these recommendations are tabulated, the 10% uplift recommended for VALP in comparison with Eastleigh is too low:

Location	Affordability ratio	National comparison	Uplift recommended
England	7x		
Eastleigh	8.6x	20% higher	10%
Aylesbury Vale	10.4x	50% higher	10%
Bucks HMA	12.1x	75% higher	15%
Rest of HMA	13.9x	100% higher	20%

The disconnect between the affordability ratio, the national comparison and the uplift recommended for Aylesbury Vale is obvious. An affordability ratio for Eastleigh 20% higher than the national average leads to a recommendation for a 10% uplift. An affordability ratio for Aylesbury Vale 30% higher still leads to no further recommended uplift yet an affordability ratio for the Buckinghamshire HMA only 25% higher leads to an uplift 5% higher as does the increase in the affordability ratio for the rest of the HMA excluding Aylesbury Vale. Even if the 20% uplift for the rest of the HMA is correct, the uplift for VALP should be 15% to be in proportion with that recommended for Eastleigh and that for the whole HMA should be about 17-18%.

107. Recent evidence shows the differences between Aylesbury Vale and the rest of the Housing Market Area decreasing which suggests that the uplift for VALP should more likely be 20% than 15%. This is a finding which differs from the conclusions reached in the various appeal decisions and reports which were submitted in evidence to the examination²⁹ but is based on more recent information. A check against ONS workplace-based affordability ratios for the lower quartile of house prices shows that over the last twenty years, Aylesbury Vale has sometimes been more affordable than Wycombe and sometimes the reverse. This confirms my view that, if using the "Eastleigh comparison", Aylesbury Vale should have an affordability uplift comparable to that of Wycombe.
108. Subsequent to the preparation of the HEDNA, a report from LPEG to the Communities Secretary and to the Minister of Housing and Planning March 2016 offers recommended systematic adjustments for market signals to replace the system of professional judgement used at Eastleigh and other local plan examinations thitherto. Application of this methodology would set a 25% uplift for market signals in Aylesbury Vale. I do not insist upon the application of this figure but take it as confirmation of my view that the "Eastleigh comparison" method produces an affordability uplift for Aylesbury Vale which is too low.
109. For all the above reasons I conclude that there needs to be a higher uplift to the baseline housing need so as to arrive at the full objectively assessed need for Aylesbury Vale. What that uplift should be is a matter of judgment. Taking account of my observations on migration rates, response to market signals and allowance for the early effects of the Cambridge – Milton Keynes – Oxford growth arc, my interim findings were that this should be at least 20% and probably 25%. It would have followed that the OAN for Aylesbury Vale (before considerations of unmet need from other local authorities is taken into account) would be (rounded) at least 21,100, probably 22,000.
110. Following my initial findings, the Council commissioned further work from its consultants ORS. That further work (Examination document ED180A) has convinced me that, as a matter of judgement, an OAN for Aylesbury Vale should be 20,600. The figure is reached by the following calculation;

Housing need based on household projections	17,584
Adjustment for suppressed households	135
Further adjustment of 17% in response to market signals	<u>2,854</u>
Subtotal (Needs of Aylesbury Vale District)	20,573

The total is rounded to reach a figure of 20,600.

²⁹ APP/J0405/V/16/3151297 decision paragraph 24, APP/J0405/V/16/3151297 report paragraphs 140-143, APP/J0405/W/16/3142524 decision paragraph 20, APP/J0405/W/15/3137920 decision paragraph 23 and report paragraph 13.25 and APP/J0405/W/17/3175193 decision paragraph 26.

111. The Council's consultants point out that the rate of growth identified for Aylesbury based on the OAN of the submitted plan would be 1.25% pa, higher than many other plans in the wider south east and around 20% higher than the 1.05% needed nationally to deliver 250,000 dwellings each year. They suggest that higher growth rates would be unbelievable. But the growth rate proposed for Aylesbury includes a considerable amount of growth displaced from other authorities within the HMA; that for the HMA overall is below 1% and would be less than the 1.05% needed to meet the national growth target of 250,000. Evidence provided to the examination demonstrates that a growth rate of 1.8% pa in a neighbouring authority is not unreasonable.
112. There is nothing inherently implausible in VALP exhibiting growth rates amongst the nation's highest. To produce an average, some authorities must be above the average in compensation for those who will be below it. Even if the ONS figures were accepted without adjustment, the growth rate for the HMA would be the lowest of all counties around London.

Unmet needs

113. The full objectively assessed need is identified for each of the components of the Central Buckinghamshire Housing Market Area. But it is anticipated that three of the components; Wycombe, Chiltern and South Buckinghamshire will not be able to accommodate their full objectively assessed needs. The extent of unmet need has been identified through joint working in accordance with the duty to cooperate, described earlier. The extent of Wycombe's unmet need to be supplied within Aylesbury Vale has been found sound at examination³⁰. The extent of the other areas' unmet needs has not been tested at local plan examinations³¹. In all cases, agreement has been reached on the levels of demand which are likely to be displaced towards Aylesbury Vale through Memoranda of Understanding.
114. The Inspector's report for the Luton Local Plan corrected the objectively assessed need for the wider Luton Housing Market Area from "best fit" administrative boundaries to the full Functional Housing Market Area so as to include the small areas which fell outside the "best fit" but within North Hertfordshire and Aylesbury Vale³². He identified that 400 of the objectively assessed need arising from this wider area originated within Aylesbury Vale. He also found that the objectively assessed need for Luton could not be met within its boundaries and that the direction of unmet need would be identified through a Joint Growth Options Study.
115. In fact, by calculating Aylesbury Vale's objectively assessed need on the basis of a "best fit" housing market area following administrative boundaries, the Central Buckinghamshire HEDNA has incorporated the demand arising from

³⁰ Wycombe District Council Local Plan Inspector's report July 2019 paragraph 34.

³¹ They will not now be tested because the Chiltern South Bucks Plan has been withdrawn. Nevertheless the identification of the need through joint working in accordance with the Duty to Cooperate remains.

³² Luton Local Plan Inspector's report Main Modification MM09

that part of the Luton HMA located within Aylesbury Vale's boundaries so there is no need for VALP to make specific provision for Luton's unmet needs. Moreover the draft Memorandum of Understanding between Aylesbury Vale and Central Bedfordshire District Councils' records that the Joint Growth Options Study concluded that, with alterations to the Green Belt, sufficient capacity existed within Central Bedfordshire to accommodate unmet need arising from Luton. These alterations are proposed as part of the submitted Central Bedfordshire Local Plan. There is therefore currently no requirement for unmet housing need from Central Bedfordshire to be met within Aylesbury Vale. There is likewise no identified need for unmet needs of other housing market areas outside Central Buckinghamshire to be met within Aylesbury Vale.

116. I note the view of Slough BC that that authority's own unmet needs should be considered together with the unmet needs of that part of South Buckinghamshire which falls within the Slough and Reading Housing Market Area in the Joint Growth Study which has been commissioned. I concur with the view that to the extent that South Buckinghamshire falls outside the Central Buckinghamshire HMA, its unmet needs would in practice be unlikely to be displaced towards Aylesbury. To that extent, the inclusion of the whole of South Buckinghamshire within the Central Buckinghamshire Housing Market Area inflates the quantity of unmet need which VALP should be expected to accommodate. But the quantity of unmet need for which VALP makes provision includes a figure for Chiltern and South Bucks combined so it is not possible to separate out a figure for the part of South Bucks falling outside the Central Bucks HMA.
117. The examination of the Wycombe Local Plan has resulted in the identification of an increase in housing supply within that authority. Examinations of local plans for Chiltern and South Buckinghamshire will not now take place because the Chiltern South Bucks Plan has been withdrawn. The outcomes for those areas can only be speculative. If it subsequently turns out that these areas can supply additional housing land so that the likely displacement of demand towards Aylesbury Vale does not in fact occur to the extent allowed for, that would not render VALP unsound because it is government policy to boost significantly the supply of housing. The plan would only be unsound if insufficient allowance were made. In the light of the information before me, it appears that the figure of 8,000 representing demand for dwellings in Aylesbury Vale likely to be displaced from other parts of the Central Buckinghamshire HMA represents the most appropriate figure in the light of the information currently available. With this figure for unmet need, the identified housing need for Aylesbury Vale would rise to 28,600 (in rounded terms).
118. The feasibility of accommodating this displaced demand was challenged on several grounds. Although Aylesbury Vale forms a separate sub-market within the overall Central Buckinghamshire Housing Market Area, the work done on identifying the Housing Market Area convinces me that it is a plausible location to which housing demands would be redirected if people cannot find the accommodation they seek in Wycombe, Chiltern or South Buckinghamshire. A second ground of challenge was the deliverability of the allocations proposed within VALP. I now turn to this issue.

Deliverability

119. As submitted, the plan implies a delivery rate of 1405 dwellings pa for the remainder of the plan period (after allowing for shortfalls in the first few years of the plan period). Representations expressed concern about the Council's ability to rise to the delivery rate implied, though, paradoxically, their suggested solution is to increase the number of allocations, and the implied delivery rate, still further.
120. Over the four years to April 2017, the Council delivered an annual average of 1231 new dwellings. In both 2014/15 and 2017/18 its submitted evidence base recorded that it exceeded the 1405 rate which would be required for the remainder of the plan period to meet the requirements of the submitted plan³³. Its forward trajectory at the time of submitting the plan suggests that completions would continue to rise with an average of 1846 pa expected to be delivered for seven years 2019/20 – 2025/26³⁴. This would still comfortably exceed the increased housing requirement implied in my recommended uplift to the OAN.
121. The trajectory, referred to in paragraph 3.78 of the plan was submitted as a separate, supporting document. But, as it was intended to use it, rather than an annual average delivery rate, as a reference for monitoring the plan, it is necessary that it be included within the plan itself. Modifications **MMs23** and **277** provide this and are necessary for effectiveness. In drafting its proposed modifications the Council originally went beyond what was necessary, including a projection of an identified and itemised five-year housing supply from a start date of 2018. This led to a number of representations questioning its reliability.
122. But, the Plan is being examined in relation to NPPF 2012. Unlike paragraphs 67 and 73 of the 2019 NPPF which require both a housing trajectory and an identified housing supply for the first five years of the plan period to be included as policies within the Plan, only the first bullet of paragraph 47 of NPPF2012, applicable to this examination, sets out a requirement for the Local Plan. It should meet the full, objectively assessed needs for market and affordable housing in the housing market area, including identifying key sites which are critical to the delivery of the housing strategy over the plan period.
123. The subsequent bullets advising that a local planning authority should identify and update annually a five-year supply of specific deliverable sites and illustrate the rate of housing delivery through a housing trajectory are silent on whether these documents should be included within the plan itself. The

³³ Its revised trajectory, submitted as part of modification MM23 corrects these figures, so they would in fact have fallen short by 50 and 10 respectively, within acceptable margins of error. The revised trajectory records a drop to 1371 for 2020/21 which includes the first year of the pandemic.

³⁴ The Council's revised trajectory, submitted as part of modification MM23 extends the delivery period so that an average of 1745 is predicted to be delivered for nine years from 2021/2 to 2029/30

Council has chosen to monitor the plan by reference to an expected housing trajectory but there is no requirement for it to identify a five-year supply within the local plan itself and so, I do not recommend inclusion of the Council's suggested modification itemising a five-year housing land supply since it would be valid only for a moment in time, not for the duration of the plan.

124. If VALP's housing requirement is translated into an annual target and then applied retrospectively to the five years since the plan's start date of 2013, then performance will be recorded as not meeting that target for the past five years. Some would interpret this as meaning that the Council would be classified as having a record of persistent under delivery against its target. In consequence, it is said that it should be classed as an authority which should bring forward an additional 20% buffer to its annual housing targets. In turn, this would mean that the allocations in the plan as submitted would not demonstrate a five-year housing land supply. But, as noted a few paragraphs earlier³⁵, that under delivery has not persisted and so, only a 5% buffer would need to be included in its annual housing targets.
125. Moreover, I consider that retrospective application of targets in this way would be misdirected. The Council cannot seek to meet targets until they are set. They are not set until the conclusion of this examination and the adoption of the plan. At that time, the Council's annual average target will become the residual undelivered requirement for the plan period divided by the remaining years of the plan period. Before that time, its targets are calculated with reference to housing needs objectively assessed at the time in accordance with judgements of the courts. Thus correctly interpreted, the suggestion that the allocations in the submitted plan would not provide the basis for a 5-year housing land supply on adoption is unfounded.
126. Representations expressed concerns about the plan's reliance on large sites, citing 2016 research by Nathaniel Lichfield and Partners *Start to Finish* (which found that sites of 2000+ units only deliver 2.5 times as many dwellings per annum as a site of 500 dwellings), *a Report into the Delivery of Urban Extensions* by Hourigan Connolly dated February 2014, *Housing Delivery on Strategic Sites* by Colin Buchanan and Partners 2005 and a DCLG/University of Glasgow report of 2008 *Factors affecting Housing Build-out Rates*. It is generally reckoned that a site can deliver about 40-50 dwellings per annum per sales outlet³⁶. But experience to date shows that sites in Aylesbury can exceed these delivery rates; Kingsbrook has two sales outlets but achieved an output of 219 completions in a year; Berryfields achieved 450 completions from four outlets. I can therefore be confident that the reliance on large sites does not make the plan unsound.

127. I recognise that a plan which depends for its delivery on a few large sites is susceptible to circumstances which may only affect an individual site. For that

³⁵ In paragraph 120

³⁶ Housing Delivery Study for Buckinghamshire, paragraph 6.74 and Figure 31

reason, I am not convinced that the use of an annual average target for evaluating performance would be appropriate in the case of a plan which depends for its delivery on a few, large sites. Representations which argued that the number of homes proposed in VALP and its dependence on large sites made the plan undeliverable argued for the allocation of additional sites, implying an increased delivery rate. The paradox was explained by pointing out that smaller sites can be delivered to shorter timescales and so would make the plan more robust.

128. That may be so but would be an improvement to the plan, not a modification necessary to make it sound. If it were the plan's intention that its housing requirement be delivered on an annually equal basis by averaging out its plan period requirement and setting that as an annual target, then the more agile approach of a strategy dependent on the delivery of a large number of small sites might have been appropriate. But, that is not what the plan sets out to do. It sets out to achieve its housing delivery over the plan period as a whole. For that reason, annual monitoring by reference to an annually averaged target, applying backlogs by means of the Sedgefield approach, would be inappropriate in the case of this plan. The use of the Liverpool approach, which the Council intends, would be more appropriate to the strategy of the plan. Part of modification **[MM23]**, previously referred to, makes this clear. The most appropriate way of monitoring this plan would be by reference to its housing trajectory, which is what policy S9 (to become S8) proposes.
129. Representations also pointed to the burden of infrastructure which allocations around Aylesbury were expected to shoulder. This was specifically recognised in the Vale of Aylesbury Local Plan Viability Assessment carried out by the Dixon Searle Partnership for Aylesbury Vale District Council in August 2017.³⁷ Examination of the deliverability of individual sites does not lead to any conclusion that the infrastructure burden would impede their delivery. The Council is pursuing a programme of Site Delivery Statements agreed with identified developers for individual sites. Those submitted to the examination do not indicate that the infrastructure burden would impede their delivery. I conclude that VALP does not impose an excessive infrastructure burden.
130. At the time of VALP's submission there remained, in relation to a number of site allocations, issues with the Environment Agency and the water and sewerage undertakings concerning flood risk and infrastructure capacity, the latter partly related to recently introduced ways of requisitioning and funding increased capacity. These were resolved during the examination and result in a number of modifications which are necessary to justify the deliverability of the plan. **[MMs 41, 48, 55, 74, 82, 84, 101, 275, 276]**.
131. The deliverability of individual sites is considered in a separate section of this report. Examination of those issues does not lead me to conclude that the plan as a whole, or the housing numbers proposed within it, would be

³⁷ VALP Viability Assessment Executive Summary paragraphs xiii and xiv and main report paragraphs 2.9.3 – 2.9.5 and section 2.10

undeliverable. I do recommend that the words "at least" be inserted in front of proposed housing quantities because the feasibility studies which provide evidence for the figures do not demonstrate that more cannot be achieved and it is government policy to boost development, particularly the supply of housing. Representations to this modification pointed out that it introduces an element of uncertainty, but none called for the figures to be used as a maximum. This element of modifications **MMs 10, 31, 35, 41, 48, 55, 61, 62, 63, 64, 65, 67, 68, 69, 70, 75, 81, 82, 84, 85, 88, 89, 94, 95, 98, 99, 100, 101, 103, 104 and 105** adds robustness to the expectation of delivery.

132. In consequence, there is no reason to conclude that the plan would be unsound because of an inability to deliver the increased quantity of housing proposed in the modifications. The plan as submitted includes a total supply buffer of 5.2% to allow for uncertainties. This seems a reasonable allowance to make. In fact, modifications will increase this buffer to 5.4%.

133. This buffer should not be confused with the 5% buffer which is included in a Council's annual calculation of its five-year land supply. That buffer is a figure brought forward from later in the plan period. It does not increase the required provision for the plan period as a whole. By contrast, the buffer of 5.2% which is included within VALP is a buffer for uncertainty over the whole plan period. It increases the overall land allocation needed to meet the housing requirement. My previous findings of 20,600 for demographic projections including uplifts and 8,000 for unmet needs from elsewhere in the HMA, would result in a housing requirement figure of 28,600 dwellings over the plan period. A buffer of 5.2% would result in a need to allocate sites sufficient to accommodate 30,100.

Conclusions on housing needs

134. I conclude that the plan should be modified to set a figure of 28,600 as the housing requirement excluding any buffer. This is the base housing requirement figure which should be used in any calculation of a five-year housing land supply. However, to ensure delivery of that requirement, the plan needs to allocate land which, including completions and commitments during the plan period, would be sufficient for 30,100 dwellings by including a 5.2% buffer. This is necessary to provide confidence that the objectively assessed needs of the area will be delivered. [**MMs 1, 2, 3, 9, 10, 11, 12, 23, 24, 25, 27, 81, 90, 92, 93, 96 and 277**]. The housing supply included in the plan after modification therefore comprises;

• OAN	20,600
• Unmet needs from elsewhere	8,000
• Buffer for uncertainty	<u>1,500</u>
• Total	30,100

135. Some of the housing supply will be delivered by commitments which have already been entered into during the early years of the plan period. Further modifications are necessary to reflect the passage of time and the need to update data [See the "completions and expected times of delivery" sections of

MMs 35, 41, 48, 55, 57, 61, 62, 63, 64, 65, 67, 68, 69, 74, 82, 84, 85, 88, 89, 94, 95, 98, 99, 100, 101, 103, 104 and 105, together with **MMs 25A, 25B, 30A, 38A, 55A, 55B, 55C, 89A, 95A**]. (In fact, the modifications proposed by the Council and which I recommend, result in a buffer of 5.4%, but the difference is not material).

136. As a transitional plan, VALP is not required to set out a five-year housing land supply position on adoption as a policy within the plan. The issue is whether it will ensure a supply of land capable of delivering five years' worth of housing against the LPA's housing requirement, with flexibility to respond to changing circumstances. My earlier analysis indicates that it would be inappropriate to apply a delivery test based on an annual housing requirement derived from an average of the housing requirement for the whole plan period because the plan's dependence on a few, large, sites means that its housing trajectory is heavily back-loaded. Consequently, the annual housing requirement varies over the period of the plan in accordance with its planned trajectory. Nevertheless, there is every expectation that it would be able to deliver its housing requirement for the plan period, during the plan period and provide a five year supply on adoption.

Issue 4 – Whether specific site allocations are justified, effective and compliant with government policy.

137. A number of the site allocations in VALP are uncontroversial but modifications are nevertheless necessary to reflect a change in circumstances since the plan was submitted (such as the development of a site or its withdrawal from availability). Paragraph 157 of the NPPF advises that Local Plans should be kept up to date and so, without the following modifications which bring specific allocations up to date the submitted plan would be contrary to national policy [**MMs 31, 49, 50, 51, 58, 62, 63, 64, 65, 66, 67, 68, 69, 90, 92, 93, 95, 96, 102, 103, 104, 286**].
138. As stated earlier, my report does not respond to every point or issue raised by representors. I report here only on those allocations where I am unconvinced by the Council's response to my initial questions or where a person making a representation exercised a right to be heard. Notwithstanding the limited number of allocations considered in this section, other allocations are the subject of modifications as a result of issues considered elsewhere in this report.

Allocation AGT1 South Aylesbury

139. Elsewhere in this report I remark on the extent to which VALP delegates policy requirements to SPDs and I recommend MMs to identify those elements which should properly be included in the plan itself. That recommendation applies with equal force to several of the site allocations which make reference to the need to produce an SPD or masterplan before delivery can commence. Allocation AGT1 is one such.
140. The allocation is in several separate ownerships. Coordination of access particularly for pedestrians and cyclists so as to ensure permeability across the allocation as a whole is necessary. So is identification of the location of facilities to be supported collectively by all the components of the allocation. But all those requirements need to be set out in the plan itself. The

implementation approach of this allocation should be modified accordingly. Modifications also need to pick up policy requirements stated in the supporting text rather than in the allocation policy itself and to reflect the fact that the capacity of the allocation, as with all housing allocations, may be greater than previously envisaged [**MMs 32, 33, 34 and 35**] are therefore needed for effectiveness.

141. Publication of these modifications has led to representations which have clarified the differences between the Council and the potential developers of this allocation. They include the application of green infrastructure policy and its definition, the need for community buildings, retail and gypsy and travellers' pitches and the capacity of the site. Whilst an SPD, whether prepared and imposed by the Council or prepared by developers and adopted by the Council, can elaborate on policy, only the examination of policies stated in a development plan can conclude that they are sound.
142. Whilst I have no reason to dispute the former County Council's assertion that full delivery of the whole allocation is dependent on the completion of the South East Aylesbury Link Road (SEALR) between Lower Road and Wendover Road, that should not prevent individual parcels of development proceeding to the extent that each can be supported by the actual road network available at the time. The intended alignment is known and should be shown on the policies map or within the allocation provisions so that individual developers can take account of it and other requirements of the plan in drawing up their schemes.
143. Having read the evidence and listened to the submissions at the April 2021 hearing session concerning this allocation, I am less convinced of the necessity of precluding any direct access to any part of the allocation from the SEALR. I agree with the Council's contentions that the SEALR is intended to provide a higher level of service than an all-purpose road with frontage access and that, in general, it makes sense to limit access points to fewer than two per kilometre. Nevertheless, the SEALR is just over a kilometre in length with roundabout junctions, rather than access points at either end and so care needs to be taken that, in applying the principle, which is generally sound, the result does not leave parcels of land inaccessible and incapable of development. That would be an unsound outcome. The dilemma is best resolved through the intended SPD or through the development management process and so I have adjusted **MM35** so that clause (d) of allocation D-AGT1 is less dogmatic.
144. One landowner has already indicated that provision can be made for a school and community centre within their scheme and there does not appear to be any dispute over the need for a school. The evidence base³⁸ identifies a need for a minimum of six additional community centres in the Aylesbury Strategic Settlement Area. It also shows³⁹ that the catchment for all centres covers the

³⁸ The Assessment of Open space, sports and Recreation Needs for Aylesbury Vale final report March 2017, paragraph 4.30

³⁹ Ibid paragraph 4.25

entire sub market area so therefore accessibility relates to the strategic settlement area as a whole rather than individual community areas. On that basis it is right and sound that VALP allocates the provision of a community centre pro rata to the expected growth in each allocation. Allocation AGT1 is expected to deliver about one-eighth of all the housing allocations within Aylesbury, so it follows that it is not disproportionate for one of the six community centres required for Aylesbury as a whole to be located there.

145. On the other hand it was made clear during examination hearing sessions that the requirement (criterion q) for the provision of on-site health facilities (including temporary buildings if necessary) was not justified but that a contribution to an off-site health facility to be provided on allocation AGT3 to serve all three allocations AGT1, AGT2 and AGT3 is justified. A modification is necessary to give effect to this.
146. I am satisfied with the Council's explanation that areas which are known to flood within the allocation will be reserved for open space purposes and other uses compatible with their flood risk status. In response to concerns about the plan's compliance with national policies, the Council has reviewed the plan's requirements concerning open space and green infrastructure (discussed in another section of this report). There is no sound reason to except allocation AGT1 from these provisions so as to classify private gardens as falling within the ANGSt definitions adopted in policy I1.
147. In common with many allocations, modifications are necessary to clarify the new arrangements for funding water and sewerage infrastructure. I deal with the gypsy and traveller requirement elsewhere in my report but I reach a conclusion similar to that on community centres; namely that the allocation should make its proportionate contribution to the delivery of sites required.
148. I accept that although the allocation requires the retention of a buffer of open space to prevent coalescence with Stoke Mandeville the separation of that settlement from Aylesbury will be reduced. However, I share the view expressed by the Inspector who examined the Core Strategy in 2010 that by its nature Stoke Mandeville is a larger settlement which would remain as a significant entity with greater critical mass to withstand overpowering encroachment and so the reduced separation which would result from the retention of a buffer of open space would be a sound outcome.
149. In its note to me following the April 2021 hearing session relating to this allocation, the Council explains how it arrived at the capacity indication of 1,000 dwellings, making the point that the development on site should not be led by numbers but rather that the numbers should be an outcome of the policy criteria. Within that explanation, I note the potential for increasing capacity through the use of mixed development to provide a local centre. The Council does not point out, but I am aware, that it is common practice in parts of the country to provide school buildings as part of mixed use developments or that school playing fields can be managed so as to be shared with the public and so contribute to the provision of green infrastructure. I am therefore satisfied that there is considerable potential for increasing the number of dwellings to be provided beyond the 1,000 indicated by the Council's calculations and that the modification to include the words "at least" is needed to reflect government policy to boost the supply of housing. With the

necessary modifications indicated [**MMs 32, 33, 34 and 35**], I have no reason to find this allocation unsound overall.

Allocation AGT2 south west Aylesbury

150. Many of the issues relating to this allocation are similar to those concerning AGT1 and I will not repeat the arguments here. Similar modifications are required to move policy from supporting text into the allocation policy itself [**MMs 36, 37, 38, 39, 40 and 41**] so as to be effective. The issues that are unique to this allocation are the degree to which HS2 is likely to present a constraint to development and the degree to which heritage considerations should present a constraint to development.
151. At the southern end of this allocation and at its northern extremity, the route of HS2 would be in a cutting. This would limit noise spread. By contrast, it passes the central, and narrowest, part of the site on an embankment. It is certainly true that, as a result, a considerable extent of the allocation site would require sound insulation to be provided but that is not uncommon in other locations when housing is developed near to a main transport artery. Moreover, the garden city concept requires 50% of the site to be laid out as green infrastructure in any event so the actual additional limitation imposed by the proximity of HS2 would be minimal and not a reason to declare the allocation unsound.
152. At its northern end, allocation AGT2 abuts the A418 Oxford Road. On the opposite side of Oxford Road is parkland associated with Hartwell House, a Registered Historic Park and Garden and Conservation Area. Paragraph 129 of the NPPF advises that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal, including by development affecting the setting of a heritage asset and take this assessment into account when considering the impact of a proposal on a heritage asset.
153. Although the existence of Hartwell House historic park and garden is referenced in supporting paragraph 4.43, and is clearly shown in Figure A of the Technical Annex to the Sustainability Assessment Report, there is no indication in the HELAA for the relevant land parcel (STO016) that any heritage assessment was made in relation to allocation AGT2.
154. The significance of the heritage asset is that it represents an eighteenth century landscape park and pleasure grounds. It would originally have been set in an agricultural landscape and, as the listing entry records; it is still set within agricultural land to the west and south. Part of this comprises allocation AGT2. But much of that agricultural setting has already changed. A golf course covers parts of the two arms of the outer park and the pre-1945 agricultural setting to the east has been lost to development, a road replacing a brook as the eastern boundary of the parkland.
155. Although the agricultural land to the south is part of the setting of the heritage asset, the connection is tenuous because the south east boundary of the park is formed by a 2km long rustic stone wall of Portland limestone. Behind it is a tree belt which, as the listing entry relates, is important in screening the park during the approach from Aylesbury. Another narrow belt of trees flanks the south side of the road, creating an informal avenue. The setting of an asset is

not necessarily what can be seen when looking to or from the asset; it is more to do with how the asset is experienced. In my view, this avenue of trees is more important in the setting of the asset than the nature of the land which lies behind the avenue on its south side.

156. In any event, the construction of HS2 will radically alter this setting and the way one experiences the heritage asset because it would slice through the registered park just slightly to the east of the boundary between the inner and outer park. It would cross the Oxford Road on an embankment, necessitating the diversion of the road to the south, largely eliminating any connection between the remaining part of allocation AGT2 and the severed halves of the registered park. It is within this context that the effects of the proposal on the setting of the heritage asset need to be appraised.
157. The site is allocated not just for housing but also for strategic flood defence and surface water attenuation, amongst other things. The developer's current masterplan for the site indicates a wetland park area at the north end of the site, abutting Oxford Road and its realignment. As that is a low part of the site, I concur that that is a likely outcome in any approved layout of the site. The change from agricultural land to wetland parkland, severed from the heritage asset by the HS2 and the realigned Oxford Road would have such a marginal effect on the way the heritage asset is experienced that I consider it to be of no consequence and so conclude that this allocation is sound, even though it appears to have been put forward without a prior heritage assessment.

Allocation AGT3 Aylesbury north of A41

158. Many of the issues relating to this allocation are similar to those concerning AGT1 and I will not repeat the arguments here. Similar modifications are required [**MMs 42, 43, 44, 45, 46, 47 and 48**] both to bring the details of the allocation up to date and to transfer policy from supporting text into the policy of the allocation itself so as to be effective. The issues that are unique to this allocation are whether the allocation has been correctly assessed in relation to flood risk, whether the extent of "not built development" notation on the policies map is justified and whether the traffic impact concerns of a previous decision by the Secretary of State have been overcome.
159. Advice in the NPPF is that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk but, where development is necessary, making it safe without increasing flood risk elsewhere. Technical guidance on flood risk published alongside the NPPF sets out how this policy should be implemented.⁴⁰ It involves a Strategic Flood Risk Assessment, the application of the Sequential Test and, if necessary, the exception test. Local plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property by applying a sequential test and, if

⁴⁰ <https://www.gov.uk/guidance/flood-risk-and-coastal-change#planning-and-flood-risk>

necessary, an exception test. Development should not be allocated if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding. If that is not possible consistent with wider sustainability objectives, then an Exception Test can be applied. This has two parts, the first being that it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk.

160. A level 2 Strategic Flood Risk Assessment for Aylesbury Vale has been carried out. Four sites within that assessment fall within allocation AGT3; sites BIE022, WTV017 and 018 and AST037. The maps for these sites demonstrate that the area annotated on allocation AGT3 for "not built development" largely coincides with the areas of identified flood zones 2 and 3 on those assessments. Allocation criterion (k) requires flood zones 2, 3 and 3a (recognising climate change) to be preserved as green space with built development restricted to flood zone 1. It is thus apparent that allocation AGT3 complies to that extent with the injunction to direct development away from areas at highest risk.
161. But the allocation includes a number of elements. In addition to those which would clearly fall within the scope of the description of "built development" is the provision for a "distributor road connecting with the ELR(N) and the A41 Aston Clinton Road."
162. The alignment of this road is nowhere shown in the submitted plan. In another section of my report I consider whether it should be. But, in any event, it is clear that in order to connect the two specific points mentioned, it would have to pass through or across areas identified as flood zones 3a and 3b.
163. A road which is described as a Strategic Link Road would clearly fall within the description of "Essential Infrastructure" for the purposes of Table 2 of national Guidance relating to flood risk and coastal change. In accordance with that advice, it should only be included as a proposal in the plan if it passes the exception test. As noted above, this has two parts. The claimed sustainability benefit to the community for this project is stated in the sixth bullet of paragraph 4.65 of the plan; reduced congestion and improved quality of the town centre environment. Greater detail is given in Paragraphs 6.5.11 and 6.5.12 and the Technical Annex of the Sustainability Assessment Report describing the consideration which was given to the option of including allocation AGT3 within the plan's spatial strategy. It recognises that a new link road through the Woodlands (AGT3) site would be of particular strategic importance. I examine the justification for this proposal elsewhere in my report and conclude that it is sound.
164. The second part of the exception test is that the proposal will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere and, where possible, will reduce flood risk overall. National Guidance also advises that in flood zone 3a essential infrastructure should be designed and constructed to remain operational and safe in times of flood and that in flood zone 3b, essential infrastructure that has to be there and has passed the Exception Test should be designed and constructed to remain operational and safe for users in time of flood, result in no net loss of

floodplain storage, not impede water flows and not increase flood risk elsewhere. These requirements are met by criteria (h), (i) and (l) of the allocation.

165. I therefore conclude that the allocation has been correctly assessed in relation to flood risk. However, as noted earlier, the allocation does not include any specific alignment for the Strategic Link road proposed. NPPF paragraph 152 advises that significant impacts on any of the dimensions of sustainable development should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. NPPF paragraph 182 advises that to be justified a plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. I consider these matters further in relation to the road proposal element of allocation AGT3 in another section of this report.
166. As noted earlier, the area of land identified at risk of flooding through the Flood Risk Assessment does not precisely coincide with the area identified in the allocation as "not built development". One particularly noticeable discrepancy lies in the area to the north of Weston Mead Farm where an area, apparently not at risk of flooding has been designated as an area of "not built development".
167. Paragraph 1.23 of the plan explains that areas marked as "not built development" are so designated either because of the findings of the Flood Risk Assessment or because of the recommendations of the Strategic Landscape and Visual Impact Capacity Study. The former does not indicate that this piece of land should not be developed. The latter identifies that the entire site is developable other than a small strip along the Bear Brook.⁴¹ The Council's response during the examination introduces a third consideration, namely the requirement for 50% of a site to be green infrastructure and the concept of the Aylesbury Linear Park shown diagrammatically in paragraph 4.21 of the plan but not included in the submission policies maps or insets. Although this additional consideration should apply equally to both halves of the Weston Mead Farm site, it appears that as part of a recent appeal submission a concept plan has been submitted by a developer indicating that, in order to comply with the requirement for 50% of a site to be green infrastructure, the northern part of the site would be so retained. This demonstrates that the Council's proposals are sound, albeit, not for the reason stated in paragraph 1.23 of the Plan. Nevertheless, modification **MM48** is adjusted so that criterion (s) would reflect the conversion potential of buildings already on that part of the site.
168. A previous appeal decision in relation to the development of the Hampden Fields (AGT4) site was dismissed over concerns relating to its effect on a junction known as the Walton Street gyratory. However, subsequent work has established that with that development in place an increased total flow through the gyratory junction can be accommodated with increased queuing

⁴¹ Commentary and map for land parcel WTV017

on certain arms compensated by reduced queuing on others and so an overall reduction in delays. This information does not lead me to a conclusion that this allocation (AGT3) would be unsound.

Allocation NLV001 Salden Chase (South-West Milton Keynes)

169. Modifications to this allocation [**MMs 72, 73 and 74**] to bring policy material within the allocation policy and so make it effective and to update the expected time of delivery result from issues nine and three discussed elsewhere in this report. The requirements of the allocation include primary and secondary schools, highway improvements and public transport provision, an employment area and a neighbourhood centre so I am persuaded that this would be a sustainable development. Concerns about the application of policy NE8 (the protection of best and most versatile agricultural land) to the site are best met through the development control process.

Allocation WHA001 Shenley Park

170. This allocation was put forward by the Council in its proposed modifications to the plan, published in November 2019. The Council was accused of not considering all reasonable alternatives in identifying increased allocations in close proximity to Milton Keynes. But, the phrase all reasonable alternatives does not equate to all conceivable alternatives. The modifications should form a seamless part of VALP; they do not form a separate plan prepared from scratch. The HELAA in the Council's original evidence base considered a very wide range of possible options. Consequently, I find it entirely reasonable that the Council should have revisited the site selection process in the HELAA in its original evidence base to identify previously short-listed options for re-appraisal. It is also reasonable that its choice should have been consistent with the overall spatial strategy of the plan, which is to rely on a few, large allocations which can, of themselves provide supporting infrastructure without the need to coordinate contributions from a larger number of smaller sites.
171. Representations also suggested that the chosen site might not be viable and that with the constraints placed upon it in the criteria attached to the allocation, might not have the capacity to deliver. Although the Council's viability study concludes with a deficit for the chosen allocation, the size of the deficit lies well within the margins of error of the appraisal method so does not demonstrate unviability. Subsequent movements in outturn values and costs would reverse the finding, according to the study's author.
172. Comments made during the hearing session by an officer of the Council to the effect that housing development would be restricted to the northern half of the allocation give credence to representations alleging that, if so restricted, the allocation would not have the capacity to deliver the housing and supporting facilities required. But the point was contradicted by other Council officers and I observe that the allocation as drafted in the Council's proposed modification, which I endorse, contains no such restriction.
173. It is fair to say that paragraph 5.1.25 of the BMD Landscape and Visual Capacity Comparison Assessment (Examination Document 210A) advises that "Development within the southern parcel would represent an unacceptable extension of development into the countryside and visible from the wider

landscape". The point is also made in paragraph 5.1.17 of the same report; "Any development within the southern parcel would be highly visible form [sic] the surrounding receptors", but that paragraph then goes on to recommend; "A further 20m buffer zone would be required to the mature woodland to the Site boundaries, this would protect these mature features and provide a green framework in which development could be located," so it is clear to me that the Council's Landscape Study has indicated a way in which development of the whole allocation could be made acceptable, which would remove any suspicion that the allocation could not deliver the quantity of development expected of it. Criteria (f) and (j) of the proposed allocation include requirements to enhance significant blocks of woodlands and hedgerows within or on the edge of the site and provide a long term defensible boundary to the western edge of Milton Keynes. These stipulations appear to be consistent with the recommendations of the Council's landscape assessment and so I conclude that the modification would not unduly restrain the capacity of the site chosen for the allocation.

174. Examination of the Council's appraisals (SA addendum, ecological, transport, flood risk, heritage, landscape, water cycle and viability appraisals and a HELAA update) of the three options for further allocations in close proximity to Milton Keynes shows that all three are suitable for allocation and that the criteria by which they were evaluated demonstrate a very marginal preference for the allocation chosen. The site chosen was strong by reference to ecology, flood risk, heritage, landscape and water cycle. It was weakest in relation to transport impacts and viability. But, the transport modelling for that site errs on the side of caution in only evaluating its impact on the rather coarse-grained network included in the county-wide model, whereas the mitigation measures set out in the allocation require connection to the Milton Keynes grid system, much of which is not included in the model. That connection would provide a much more finely-grained network which would better accommodate the traffic generated by the development than suggested by the modelling carried out, a consideration which would apply with less force, if at all, to the other sites in contention. Viability of this site has been discussed a few paragraphs previously in this report. Close examination of these two issues, transport and viability, suggests that this site's apparent weaknesses in those two considerations should not be determinative of its overall performance.

175. For all the above reasons, I am satisfied that the allocation choice made is sound.

Allocation BUC043 Moreton Road, Buckingham

176. This allocation is an example of a site proposed by the local plan within a neighbourhood plan area but not allocated by that neighbourhood plan. It has previously been the subject of a decision in July 2017 on a planning application called in by the Secretary of State in May 2016 for his own decision. That decision disagreed with the recommendations of an Inspector who held an Inquiry. Planning permission for development was refused.

177. Specifically, the Secretary of State disagreed with the advice that there was no conflict with policy HP1 of the made Buckingham Neighbourhood Plan which defines a settlement boundary for Buckingham which does not include the site. He attached very substantial negative weight to that conflict. He did not

disagree with any other of the Inspector's conclusions but, having regard to s38(6) of the Planning and Compulsory Purchase Act 2004 which requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise, concluded that the proposal was not in accordance with the development plan overall and that there were no material considerations that indicated that the proposal should be determined otherwise than in accordance with the development plan.

178. Time moves on. The Buckinghamshire HEDNA, advising on the establishment of an Objectively Assessed Need and a Housing Requirement for Aylesbury Vale reported in December 2016 but, at the time of the Secretary of State's decision, VALP was at an early stage in the process and so was given very limited weight in the decision. Subsequent to the Secretary of State's decision, the HEDNA was updated and the Council has carried out a Sustainability Assessment of a number of spatial development options in which this site was a variable, not included in 5 out of the 9 options considered. The Council chose for submission an option which includes the site.
179. As noted elsewhere in the section of this report dealing with the spatial development strategy, Buckingham currently has about 7% of the district's population. The three sites in Buckingham allocated in VALP represent 7% of all the allocations in the plan but, taking account of existing commitments, including those in the made neighbourhood plan, 8% of the development expected to take place in the district. It appears to be no more than proportionate to Buckingham's position in the settlement hierarchy.
180. As noted elsewhere in this report, I have found the Council's spatial submission strategy broadly sound subject to reconsideration of the disposition of allocations in the north of the district. But I have also found that the Council's housing requirements have been underestimated and that additional allocations need to be identified so as to meet the Council's housing needs. I therefore conclude that the allocation of this site is necessary to meet housing requirements which were not identified at the time the Buckingham Neighbourhood Plan was made.
181. The ability of the market to absorb the quantity of development proposed in the three allocations in Buckingham is questioned in relation to all three allocations as it is in relation to the overall quantity of development proposed within Aylesbury Vale by VALP. I consider this issue in the part of my report dealing with housing numbers in general. There is no specific consideration in relation to the Buckingham sites which would lead me to a different conclusion in their cases.
182. The effects of the development on highways of this and other allocations in Buckingham have been assessed during the Inquiry into the called-in application and in the County's Local Plan Modelling and in the Buckingham Transport Strategy and found acceptable subject to a number of infrastructure upgrades. However, these are neither specified within the allocation provisions nor as discrete proposals in their own right. That is an unsound omission from the plan which needs to be corrected by clause (l) of modification **MM82**.

183. In response to representations made to this and other allocations in Buckingham, the Council has referred to the Infrastructure Delivery Plan. This is part of VALP's evidence base but is not part of VALP. That is an unsound omission from the plan which needs to be corrected by modification **MM210**. Insofar as developments are to be expected to deliver the Infrastructure prescribed, then modifications to VALP allocations are necessary to specify these requirements. They are listed in the Site Delivery Statement submitted during the examination.
184. In common with a number of allocations in the plan, all three allocations in Buckingham include references to the need to align development with investment by the utilities undertakings in water and sewerage provision. The preparation of the plan has coincided with a change in the way such upgrades are requisitioned and funded. Both Anglian and Thames Water companies have clarified the way the new system operates and have suggested modifications to a number of allocations in the plan to make it clear that the need to upgrade such provision does not make the allocations unsound and is not a precondition or requirement of planning permission requiring funding by the developer but that the programme of development should be aligned with the infrastructure investment which the utility companies are required to undertake to align their capacity to the development proposed in the plan. I agree that these modifications [**MMs 82, 84, 276**] are necessary to make the position clear and effective.
185. The point is made in relation to this allocation that, as Buckingham has evolved, the centre of gravity of convenience shopping and some services, such as health centre provision has moved to the south of the town. Nevertheless, town centre convenience stores remain and so the point does not demonstrate that the allocation would be unjustified.

Allocation BUC046 Land off Osier Way, Buckingham

186. The same considerations as to the relationship with a made neighbourhood plan apply to this site as to allocation BUC043 except that, in relation to this site, there has not been a recent Secretary of State decision refusing planning permission. So do the same points concerning market absorption, infrastructure requirements specified in the Buckingham Transport Strategy and the Infrastructure Delivery Plan and water and sewerage capacity enhancements.
187. Specific to this allocation is the concern that its development would restrict neighbouring employment growth but the Council points out that this is provided for by a nearby 10ha allocation for employment development in the made Buckingham Neighbourhood Plan.
188. The Council accepts that some detailed modifications to criteria (d) relating to highway access and the deletion of criterion (e) relating to ecological management are necessary to reflect the reality of the situation [**MM84**]. I concur.

Allocation BUC051West Buckingham

189. The site is a reserve allocation in the made Buckingham Neighbourhood plan and so its potential access and impacts on landscape have been assessed and found acceptable. Otherwise, the same considerations apply to this site as to allocations BUC043 and BUC046 concerning market absorption, and infrastructure requirements specified in the Buckingham Transport Strategy and the Infrastructure Delivery Plan.
190. Particular issues concerning this allocation are that a site delivery statement affirms that multiple ownership of the site would not slow its delivery. The VALP evidence base has assessed the capacity of the site and confirms its consistency with the exclusion of development from flood zones 2 and 3.
191. It emerged during the examination that delivery of this site would be dependent on the construction of a Buckingham Western Relief Road, not included within the site particulars or shown independently within VALP. Further work by the Council affirms that the scale of development on this site would not be sufficient to finance the construction of the Western Relief Road.⁴² This consideration, together with a reconsideration of the distribution of housing allocations within the north of the district, focusing more allocations in the vicinity of Milton Keynes, leads to a Modification deleting this proposed allocation from the plan [MM83] as undeliverable and therefore, unjustified.

Allocation HAD007 – Haddenham, land north of Rosemary Lane

192. The main issue with this allocation is whether it is sound in relation to its effects on a heritage asset; the Haddenham Conservation Area. Although the setting of a conservation area is not a statutory consideration, paragraph 129 of the NPPF establishes government policy that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal, including by development affecting the setting of a heritage asset, and take that assessment into account when considering the impact of a proposal on a heritage asset.
193. The eastern end of the south-eastern boundary of this allocation is contiguous with the northernmost boundary of the Haddenham Conservation Area and so will affect its setting. Consequently, its effect on the significance of the heritage asset should be assessed.
194. It is noticeable that, of the 24 sites associated with Haddenham assessed in the Housing and Economic Development Land Availability Assessment Report January 2017 (the HELAA), five specifically mention their effect on the Conservation Area. Three are found unsuitable for development. In the HELAA, despite this allocation's contiguity with the Conservation Area the relationship is not mentioned. It is not unique in this respect since the

⁴² Examination document ED257

HELAA's appraisals of other sites⁴³ having common boundaries with the Conservation area also do not mention the relationship. However, Heritage is a specific category analysed in the Sustainability Assessment Report which covers this site in detail and the Conservation Area is specifically mentioned in the text (section (g)) of the allocation in VALP itself, so it cannot be said that the relationship has gone unnoticed or unconsidered.

195. The question then becomes whether the relationship has been soundly considered. The characteristics and significance of the Conservation Area are fully analysed in the Council's Haddenham Conservation Area report. Its significance is as a polycentric agricultural village with a linear form in which the use of witchert (a form of rammed earth) as a construction material features strongly.
196. As the Conservation Area report notes, the use of witchert in the construction of boundary walls and buildings is arguably the most significant element in defining the character of the village but it also notes that a key characteristic of Haddenham is the series of enclosed spaces of irregular shape and varying size spread throughout the village. These latter are unaffected by the allocation. Indeed, its requirement for a landscape buffer to be required between the existing dwellings and the new development could lead to the creation of a further such enclosed space, consistent with the character of the Conservation Area, though lying outside it.
197. Two views of the long witchert wall at the rear of properties in Rosemary Lane are seen across the eastern part of the allocation site. Insofar as they allow a characteristic feature of the Conservation Area to be appreciated, they need to be taken into account in considering proposals for the site. Provision (f) of the allocation appears to do that by requiring a landscape buffer between the existing dwellings and the new development. It is represented on the submission policies inset map by the annotation of an area of not built development. The proviso and annotation could be improved by making specific reference to the views mentioned in the Conservation Area report but that would be a matter of improvement to the plan; it does not strike at the soundness of the allocation. In any event, the western two-thirds of the allocation is unaffected by this consideration.
198. The potential developer of the site suggests that the north-south extent of the site would make the achievement of an adequate landscape buffer to preserve the setting of the witchert wall difficult in addition to the pedestrian and cycle access to the station through the adjoining approved airfield and Dollicott developments as well as the delivery of 315 dwellings which the allocation also requires. I concur that the potential pedestrian and cycle linkages to the west are important to secure the sustainability credentials of this allocation because the limitations of the existing footpath access onto Rosemary Lane and the circuitous vehicular access specified via Churchway would otherwise encourage the use of means of transport less sustainable than walking or cycling. The

⁴³ HAD002, HAD010, HAD015, HAD026

Council concurs with the view that the site could not deliver 315 dwellings and promotes a modification to reduce the figure to 273.

199. I also concur with the view expressed in the HELAA that the northern boundary of the site should not extend too far towards the ridgeline but there is clearly flexibility in its precise location, as evidenced by the fact that the boundary of the adjoining approved airfield development lies slightly further to the north. I also concur that it is important that the dwelling numbers envisaged in the plan's allocations are capable of delivery. But, essentially, these are all points that can be adjusted by minor modifications to the plan or through considerations of a planning application. They do not strike at soundness and so no modification to the plan is necessary other than to correct its site area, wrongly stated as 10 ha, its capacity and its phasing [MM85].

Allocation HAL003 RAF Halton

200. In an earlier version of VALP, it was proposed to delete this site from the Green Belt in which it lies. That is not now proposed because the Council accepts that there is no justification for it. For that reason, it is right that the allocation covers only the previously developed part of the RAF landholding and not the whole estate. However, there remain hints in VALP as submitted that a future review of the plan will revert to the suggestion of deleting land from the Green Belt. These hints are inappropriate and unjustified and so should be deleted from the plan [MMs 16 and 85A]. The allocation site remains within the Green Belt.
201. Critics of this allocation allege that it would be contrary to national Green Belt policy, set out in NPPF paragraphs 87 and 89. But NPPF paragraph 89 allows for the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building. It also allows for the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces. It also allows for the partial or complete redevelopment of previously developed sites which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. NPPF paragraph 90 allows for the re-use of buildings provided that the buildings are of permanent and substantial construction and provided the development preserves the openness of the Green Belt and does not conflict with the purposes of including land within the Green Belt. There is therefore considerable potential for the development, redevelopment and reuse of an existing developed site within the Green Belt consistent with government policy.
202. Much of the criticism of this allocation was directed at the Defence Infrastructure Organisation's document *Vision for Development at RAF Halton*, published in June 2018. But this is a document which neither forms part of nor is endorsed by VALP.

203. Paragraphs 4.134 and 4.135 of VALP correctly recognise the heritage assets, both designated and other, which characterise the site. The proposed closure of the RAF base, commencing in 2020 and due to be complete by 2022⁴⁴ clearly puts the future of these designated and non-designated heritage assets at risk. NPPF paragraph 126 advises that local planning authorities should set out in their local plan a positive strategy for the conservation and enjoyment of the historic environment including heritage assets most at risk through neglect, decay or other threats. It is therefore fully justified for the plan to be positively prepared in setting out a strategy for the protection and re-use of these assets even though the outcome may not come fully on-stream until the later years of the plan period. However, as the Council freely accepts in its response to my Q21, that is not what allocation HAL003 does in its present form. A modification to add specific criterion (i) relating to the heritage assets should be included in the policy [MM88].
204. The closure of RAF Halton was announced in November 2016, so the Council had fifteen months before the submission of VALP in which to prepare its proposals for the allocation of the site. It is perhaps not surprising that its preparations have been somewhat rudimentary and include inconsistencies as they have been refined over time⁴⁵ but, for the reasons explained above, I consider it an indication that the plan has been positively prepared that the allocation should be made. It would have been unsound for the plan not to contain specific proposals for a heritage asset so clearly under threat.
205. The suggestion is made, justified by repeated references⁴⁶ in the Sustainability Appraisal (SA) of the Vale of Aylesbury Local Plan September 2017 by AECOM that the allocation in VALP of Halton Camp is an alternative to the allocation of a site at Shenley Park, just outside Milton Keynes. It is also implied in that criticism that, if the allocation of Halton Camp is shown to be unsound, then the alternative allocation at Shenley Park would automatically follow. But such is to misunderstand the purposes of the Sustainability Assessment; it is to inform the determination of a preferred strategy for VALP but it does not itself determine the preferred strategy. As the final sentence in Appendix III of the Sustainability Appraisal makes clear, the intention is for the Council and stakeholders to take its findings into account when considering how best to 'trade-off' between competing objectives and establish the 'most sustainable' option. The way in which the Council has made that "trade-off" is clearly stated in paragraph 8.2.2 of the Sustainability Appraisal. It does not depend on the score of any one site but on the characteristics of the options overall.

⁴⁴ As at the time of submission of the Plan, now known to be 2025.

⁴⁵ For example, paragraph 2.20 of the Council's topic paper on Housing records an initial broad assessment establishing that there are 44 barrack blocks capable of conversion whereas the response to my Qs66 and 69 refers to 36. Representation 2038 from respondent 27869 Savills on behalf of Crest Strategic Projects reports errors in the Sustainability Appraisal relating to RAF Halton. Without endorsing those in this footnote, it is clear that the fact they can be claimed suggests that the Council's appraisal has been rushed.

⁴⁶ In Appendix III – reasonable spatial strategy alternatives, page 136 onwards

206. Moreover, it is clear, from the different impacts which each of the two sites would have on each of the twelve assessment criteria evaluated in Appendix III of the SA that they are only alternatives in terms of scale, they do not substitute for each other in almost every other respect, not least because of their differing timescales of delivery and different geographic locations at opposite ends of the district. The different options evaluated either include or exclude the two sites as may be. At least one option excludes both sites. As is made clear elsewhere in this report in discussion on the spatial strategy and on the housing requirement, I recommend that both sites be included in the plan.
207. The scoring system used in the SA is a matter of judgement. Although I might come to a different judgement in a particular instance, as do some of the representations made, it does not follow that the judgement made in the SA is thereby unsound; it is simply different. An SA informs but does not direct the content of a plan.
208. This allocation might have been scored more highly for sustainability because of its potential effects on Listed buildings, registered parks and gardens or scheduled monuments. The SA sees the proposal as a threat to the heritage assets. But the proposal also represents an opportunity for a heritage-led scheme to secure the retention and conservation of those assets which are otherwise likely to be at risk. But that potentially different perspective does not make the whole SA unsound, let alone the plan to which it relates. Rather, it reinforces the conclusion that allocation HAL003 is justified and therefore, sound.
209. An allocation adjacent to Aylesbury is proposed for development of up to 3,000 dwellings. It is of similar extent to the allocation proposed at Halton for 1,000 dwellings. Given the Green Belt and heritage constraints of RAF Halton and notwithstanding the rudimentary nature of the study of conversion and redevelopment potential that has been made, I consider that 1,000 homes within the plan period is a reasonably justified ball-park figure to apply to the site.
210. As a previously developed site, the allocation has a history of existing traffic generation and so appraisal has only to consider the changes which would be brought about by the redevelopment. There is no evidence to challenge the former County Council's reported assessment that the replacement of the existing camp operations by 1,000 houses did not raise any significant concerns which could not be met by local mitigation measures which are specified in the allocation criteria.
211. I note the observations made in representations about the nature of public transport and other sustainable transport modes to and from the site and that these are no more than adequate but I take the view that a scenario which does not involve the re-use and redevelopment of the site with a comparable quantity of development to that presently existing is not credible. That carries with it implications for the provision of transport facilities which appear to be adequately provided for in the criteria attached to the allocation in the plan.
212. The Council accepted at the April 2021 hearing session, and I agree, that the reference to green infrastructure in the allocation's site-specific requirements

should be more specific about the retention of the extremely good sports facilities currently provided onsite [**MM86**, justifying the insertion of criterion (j) in **MM88**].

213. RAF Halton is reported to be one of the largest single employment sites in Aylesbury Vale. The Council does not propose that the allocation require any replacement employment provision. My reporting of the proposed retention of an excess of employment land in Aylesbury Vale concludes that this is soundly justified by considerations of the growth expected from the CaMKOx growth arc. The effects of that growth arc are expected to be concentrated in the northern part of the district. As RAF Halton is located near the southernmost extremity of Aylesbury Vale District, that consideration would not justify a policy of retaining an even greater excess of employment land in that location. It has proximity to Wycombe district from which demand for employment land is expected to be displaced but, in comparison with other allocated sites nearby around Aylesbury, lacks even the quality of road access which they offer so the fact that the allocation does not propose the retention of employment land does not render the plan unsound.

Allocation WIN001, Land to the east of Great Horwood Road, Winslow

214. This allocation is an example of a site proposed within a neighbourhood plan area but not through a neighbourhood plan. Winslow was one of the first neighbourhood plans in the country to be made. Time has now moved on. As noted elsewhere in the section of this report dealing with the spatial development strategy, Winslow currently has about 3% of the district's population. This site represents 5% of all the allocations in the plan but, taking account of existing commitments, including those in the made neighbourhood plan, just 4% of the development expected to take place in the district. That may represent growth of 55% over the plan period but when district-wide growth is 40% and is concentrated in the six strategic settlements which include Winslow that does not make the allocation unsound.
215. Investment in the provision of a rail link to Winslow would progress in tandem with the development proposed. Improved pedestrian connections with the rest of the town form part of the proposal. Transport modelling shows no more than slight increases in travel times in the town as a result of the development proposed, not requiring mitigation.
216. The Infrastructure Delivery Plan notes that the population increase resulting from the development proposed at Winslow would not justify any additional sports hall or swimming pool provision. As noted elsewhere in this report, there is an inconsistency between the Infrastructure Delivery Plan and VALP in that the former asserts that any new development sites at Winslow will be expected to contribute to a new clinic at Norden House, whereas VALP allocation WIN001 does not. Like other inconsistencies between VALP and the Infrastructure Delivery Plan, the inconsistency requires correction. In preparing its modifications, the Council does not include any requirement for a contribution to a clinic at Norden House but instead reduces the expected delivery of the site from 585 homes to 315, thus reducing its potential to make a contribution so the correction needs to be made to the IDP.

217. Some detailed provisions of the allocation, such as the requirement that development be limited to the south of the watercourse, are unnecessary relics from a previous iteration of the plan as the site now does not extend beyond the watercourse. Other detailed provisions require minor adjustments and so are the subject of modifications in **MM89** but otherwise there is no compelling evidence before me which would convince me that, in general terms, this allocation is anything other than sound.

Allocation STO008, Land south of Creslow Way, Stone

218. This allocation is part of a larger piece of land which the HELAA assessed as capable of delivering 42 dwellings as it was "part suitable – the north-eastern part of the site (1.2ha) is suitable for development at a density of around 35dph as long as highways access is provided. A Transport Assessment will be required to demonstrate impact of development is acceptable. The southern half of the site is unsuitable for development as it has landscape and visual impact constraints. Need a tree survey as there are likely to be valuable trees that are worthy of Tree Preservation Orders." Yet the VALP allocation is for the 1.2ha recommended but limited to 10 dwellings.

219. Reference is made in the Council's response to my Q71 to the need for landscape mitigation and green infrastructure around the southern and western boundary and also to the need to reflect the adjacent settlement character and density which, on the northern boundary consists of large detached dwellings. True as that is, adjacent development to the east, with which the development would have a close relationship, consists of high density terraced houses. Whilst not endorsing the details of a masterplan prepared by the intending developer of the site, it does demonstrate that potential exists for the development of a considerably larger number of dwellings whilst providing public open space and retaining boundary vegetation around the larger site as recommended by the HELAA.

220. Amongst other matters, NPPF paragraph 58 advises that planning policies should aim to ensure that developments optimise the potential of the site to accommodate development. I am convinced that allocation STO008, as submitted, would not do this and so a modification [**MM94**] is necessary to increase the expected numbers of dwellings to be developed on the site and thus bring the plan into line with national policy.

Allocation CDN001 Land north of Aylesbury Road and rear of Great Stone House, Cuddington

221. The constraints associated with the location of this site within the Cuddington Conservation Area are noted within the HELAA. I am therefore satisfied that the significance of this heritage asset has been taken into account in preparing VALP and is reflected in the site criteria included in the allocation. Although not specified in the criteria attached to the allocation, I accept the Council's advice that safe access to the development can be achieved in the light of speeds prevailing on Aylesbury Road. I therefore have no reason to find the plan, or this allocation, unsound, although a modification is necessary to update the site's expected time of delivery and to make it clear, in line with government policy, that the expected number of dwellings is to be a minimum [**MM98**].

Allocation CDN003 Dadbrook Farm, Cuddington

222. To achieve access to this otherwise landlocked site would require the relocation of operational farm buildings. The landowner asserts that this would not be a worthwhile proposition if the development is limited to 15 dwellings as VALP proposes. Subsequent correspondence with the landowner contradicts this assertion and so I now have no reason to conclude that the site is undeliverable, although a modification is necessary to update the site's expected time of delivery and to make it clear, in line with government policy, that the expected number of dwellings is to be a minimum [MM99].

Allocation ICK004 Land off Turnfields, Ickford

223. Questions were raised about this allocation because previous iterations of the HELAA had found it unsuitable for development. It is said that considerations which led to findings of unsuitability for other promoted sites apply equally to this allocation but, as aerial photographs show, the boundaries of the site are well defined by hedgerows. Its outer boundaries continue the alignments of other developments which define the outer limit of the settlement. Its development would result in the completion of a compact village form surrounding the Ickford Recreation Ground. I therefore find its allocation sound, although a modification is necessary to update the site's expected time of delivery and to make it clear, in line with government policy, that the expected number of dwellings is to be a minimum (MM100).

Allocation MMO006 Land east of Walnut Drive and west of Fosgate Road, Maids Moreton

224. At one point during the examination of VALP, the former District Council proposed to delete this allocation in the light of advice received from the former Buckingham County Council concerning the feasibility of achieving access to the site. Following further advice from the County Council as highways authority the District Council reviewed that decision and withdrew the suggested modification to delete the proposal. It therefore remains for consideration and examination in the submitted plan.
225. This about-face took place at such short notice before the hearing session in July 2018 that many people who had made representations about the allocation did not receive notification in time to attend the hearing session. So that they were not disadvantaged, I held a further hearing session in April 2021 at which it was apparent that the allocation was mightily opposed. Sheer weight of opposition does not of itself necessarily mean that the allocation is unsound but it has identified a large number of issues which need to be examined.
226. Many of the considerations which apply to the three Buckingham allocations (BUC043, BUC046 and BUC051) apply to this allocation, except that it is outside the Buckingham Neighbourhood Plan area. These are the points concerning market absorption, infrastructure requirements to deal with traffic growth specified in the Buckingham Transport Strategy and the Infrastructure Delivery Plan and water and sewerage capacity enhancements. My

conclusions on those matters in relation to this site are the same and need not be repeated. See previous sections of this report headed *Allocation BUC043 Moreton Road, Buckingham, Allocation BUC046 Land off Osier Way, Buckingham and Allocation BUC051 West Buckingham*.

227. Considerations which are unique to this allocation are its size in relation to Maids Moreton, the extent of the settlement's supporting infrastructure and hence, its position in the settlement hierarchy and a disparity between the size of the allocation and with that described in policy S2(h) and what would be allowed for an unallocated site proposed in accordance with policy D2(1). The allocation had been identified as not suitable in the HELAA 2015 but found suitable in a later edition and had been identified as the least suitable site in the village in the 2017 Sustainability Appraisal, reflecting a lack of local employment (so leading to commuting but without adequate transport infrastructure), its status as a greenfield site (so leading to impacts on wildlife), as Best and Most Versatile agricultural land and an increase in flood risk. Representations alleged that there would also be an impact on heritage assets.
228. If analysed as a freestanding settlement, the facilities which Maids Moreton enjoys would barely qualify it as a medium village in the Plan's settlement hierarchy. In terms of dwellings the parish is just within the top quartile of settlements by size within the plan area. Before the Covid-19 pandemic there were a couple of bus services but collectively they fell short of an hourly frequency and it has effectively none now (but with the potential for one to be provided should development of this allocation proceed). It has a pub but no post office, pharmacy nor even a corner shop. It has a place of worship, a village hall and a well-equipped recreation ground but only an infants' school (shortly to be expanded into a primary school) and pre-school facility, little employment and no doctor's surgery.
229. But, it is not a free-standing settlement. Residents of Maids Moreton clearly see themselves as separate from Buckingham but, to an independent observer, the two settlements coalesce. Although Buckingham Rugby Union Football Club's grounds to the west and agricultural land to the east cause a break in the continuous line of development along the main A413 and the name of the road changes from Moreton Road (in Buckingham) to Duck Lake (in Moreton), there is a continuous line of development linking Moreton and Buckingham without a break along the alternative route of Church Street, Glebe Terrace and Avenue Road. To an outsider, coalescence between the two settlements has already occurred and, in practical terms of urban landscape, supporting infrastructure and of their capacity to support development, Maids Moreton and Buckingham can draw on each other's resources. Moreton hosts the Buckingham Rugby Union Football Club which offers a facility serving an area much wider than the village alone. Buckingham provides retail facilities, health facilities and secondary schools at a distance of about a mile and a half from Maids Moreton.
230. In that light, it is both sound and reasonable to evaluate allocation MMO006 as one of a series of potential allocations in and around Buckingham. Others (BUC043 – 130 dwellings, BUC046 - 420 dwellings and BUC051 – 300 dwellings) have been discussed earlier. As such, and notwithstanding the vacillating advice of the HELAA and Sustainability Appraisals the number of

homes proposed on this allocation does not seem disproportionate. Other settlements classified as medium villages but closely associated with a larger settlement face similar scales of development when completions and commitments are added together.

231. Like many greenfield sites, the allocation would extend built development further into the countryside but no further than has been committed at the adjoining site known as MMO005 (not an allocation within the Plan). Criterion (b) of the policy as submitted, together with the extent of land shown as "not built development" on the submission policies map inset for Buckingham and Maids Moreton would limit impact on the countryside and so, needs no modification to be found sound. Criterion (f) seeks a net biodiversity gain from the allocation. Whatever the merits or demerits of the biodiversity studies associated with the current planning application, which are not for me to consider, in my experience it is not difficult for a new development to be able to demonstrate a net biodiversity gain over the baseline of land in agricultural production and so that consideration does not present itself as a ground for finding the allocation unsound.
232. Much land around Buckingham is Best and Most Versatile agricultural land and so, if growth at Buckingham is to be accommodated at all it is inevitable that some loss would occur. I have no reason to question the Council's advice that alternatives offer no advantage in terms of using poorer quality land.
233. Any development of a greenfield site carries with it a risk of increased surface water flooding because of faster run-off from hard surfaces but the risk is usually dealt with during consideration of a planning application. The submitted Plan's policy for allocation MMO006 includes criterion (e) which would require the submission of a surface water drainage scheme.
234. The former District Council's Heritage adviser was consulted on the sites included in the HELAA January 2017, as paragraph 4.21 of that report attests. Sites were frequently classified as unsuitable on account of their impact on heritage assets, including sites MMO002, MMO007, MMO009 and MMO012 in Maids Moreton itself. I have no reason to doubt that an adequate heritage assessment of this site was made during the preparation of the plan.
235. Discussions on access have been resolved to the satisfaction of the highway authority. They were explored further during the April 2021 hearing session during which it became apparent that there were discontinuities between transport advice given during the preparation of the Plan and that given during the concurrent consideration of a planning application on the site. In coming to a view on the soundness or otherwise of the Plan, I cannot ignore the advice that has been given in relation to the planning application, although the latter is not for me to determine.
236. Following the July 2018 series of hearing sessions, I asked the Council to identify and make explicit within the plan proposals for transport infrastructure which were implicit within many of the Plan's housing proposals. The outcome for Aylesbury is discussed in another section of this report. In complying with my request, the Council commissioned further work into the impacts of development proposals on the Buckingham highway network.

237. It is clear from this further work that the Council faces very difficult decisions in guiding the future development of Buckingham. Both for its own future prosperity and as the second largest settlement within the plan area, the town needs to accommodate its proportionate share of Aylesbury Vale's growth. But that growth brings with it traffic growth over and above that which occurs anyway and so puts stress on the town's historic highway network.
238. Buckingham's transport system is constrained by a few junctions of limited capacity within the town's historic core. The highway modelling work which the Council has carried out shows that because of its location on the west side of town, traffic generated as a result of allocation BUC051 would unacceptably overload those junctions unless relief were to be provided by a new road which the development itself could not fund. As reported earlier, allocation BUC051 is deleted from the plan for that reason.
239. By contrast, allocations BUC043, BUC046 and MMO006 could each fund minor improvements to the junctions through contributions to the Buckingham transport Strategy already referred to and also would add load to those junctions to a lesser degree because the likely main objective destination is Milton Keynes to the east of Buckingham and alternative routes, avoiding the town centre, are available. Those alternative routes include the use of Mill Lane (also known as College Farm Road) through Maids Moreton. The outcome would not be congestion-free but congestion would be tolerable and so not amount to a residual cumulative impact that would be so severe as to prevent development, whilst at the same time accommodating proportionate housing growth around Buckingham.
240. I acknowledge that advice given in relation to the current planning application to develop the MMO006 allocation gives the impression that traffic calming measures will be imposed on Mill Lane (College Farm Road) and that these traffic calming measures would dissuade traffic from using the roads so treated. Be that as it may, I was given explicit assurance by the Council's representative at the hearing session that my understanding was correct that the traffic calming measures were intended to make sure that the roads concerned would accommodate the traffic generated from the MMO006 allocation in a safe way. Certain aspects of the measures envisaged would afford a clear increase in capacity at the junction of Mill Lane (College Farm Road) with the A422 Stratford Road but it was also made clear that such a capacity increase would only be implemented as a contingency if, contrary to the Council's expectations, an issue arose in practice.
241. The shifting sands of analysis and policy (identification as not suitable, then as suitable in successive drafts of the HELAA, categorisation as worst option for the village in the SA, inclusion in the submitted plan, then exclusion as a proposed modification, then re-inclusion, together with the discontinuities of transport advice) have clearly undermined local public confidence in the planning authority. Nevertheless, having examined the matter at considerable length and in considerable detail, I am convinced that, given the difficult decisions which the Council has had to face in determining Buckingham's future and taking all matters together in the round, this allocation is positively prepared and justified, although a modification is necessary **[MM101]** to make the allocation effective and consistent with government policy by reflecting the contribution which the allocation will need to make to the resolution of

Buckingham's highway deficiencies, updating the site's expected time of delivery and to make it clear, in line with government policy, that the expected number of dwellings should be viewed as a minimum.

Allocation QUA014-016 Land adjacent to Station Road, Quainton

242. Accommodation works for the HS2 railway line would render this allocation undeliverable in the form presently delineated on the submission policies inset map. The delineation of the proposal on the submission policies inset map is an interpretation of policy H1 contained in the made Quainton Neighbourhood Plan but not taking account of property boundaries or of HS2 commitments. A modification to the inset map is therefore necessary to redefine the boundaries of the proposal, taking account of the road realignment to accommodate the new railway line. A modification to the allocation policy is necessary to update the site's expected time of delivery and to make it clear, in line with government policy, that the expected number of dwellings is to be a minimum [MM105].

Allocation EDL021 land off Slicketts Lane, Edlesborough

243. The VALP policies map records this as a site allocated in a made Neighbourhood Plan. That is a matter of fact and therefore, for VALP to record the fact is sound. The soundness of the Neighbourhood Plan is not a matter for me to consider; Neighbourhood Plans are examined and made in accordance with a different set of criteria.

Key employment sites

244. In the light of representations made, I have also considered whether the inclusion of the Gatehouse and Rabans Lane industrial areas as Key Employment sites protected by policy E1 would conflict with paragraph 22 of the NPPF. This advises that planning policies should avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.
245. The Council's response to my question 84 in respect of Gatehouse Industrial Estate refers to its Employment Land Review and its recommendations that, over time, there is potential for further rationalisation of employment uses at Gatehouse Industrial Estate to introduce a greater mix of uses. The Council also tells me that this has been addressed with retail and housing developments being permitted. This being so suggests that there is an inconsistency between, on the one hand, the Council's evidence base and its development management practice and, on the other hand the application of policy E1 to the Gatehouse Industrial Estate. In response, the Council proposes a Main Modification [MM285] to refine the boundary of the Gatehouse Industrial Estate shown on the policies map so as to reflect the further potential for rationalisation identified in its Employment Land Review. I agree that this modification is necessary for justification.
246. By contrast, the Employment Land Review Update identifies Rabans Lane as providing good quality industrial accommodation. It advises that policy could seek to retain the land for employment use. Its identification as a Key Employment Site is therefore justified by the supporting evidence

notwithstanding the Council's own proposal for 200 dwellings on allocation AYL115.

Issue 5 – Whether the need for housing for different groups in the community would be met effectively.

247. NPPF paragraph 50 advises that local planning authorities should plan for a mix of housing based on the needs of different groups in the community. Examples include families with children, older people and people with disabilities. In this report, I consider specifically, housing types and sizes, housing for older people, accessible housing, housing for students, accommodation for gypsies and travellers, provision for self-build housing and provision for affordable housing.

248. Policy H6 seeks to follow the NPPF advice with four policy elements. The first is related to housing types and sizes, the second to a requirement for self-contained extra care dwellings as part of housing schemes of more than 100 dwellings in strategic settlements (Milton Keynes, Aylesbury, Buckingham, Winslow Wendover and Haddenham), the third to encourage extra care housing, specialist housing for older people and for supported housing generally within all residential schemes and the fourth to a requirement that all residential development should be accessible and adaptable (Category 2 in the terms of Building Regulations Approved Document M) and that a percentage should be Category 3.

Housing types and sizes

249. The element of policy H6 relating to housing types and sizes is uncontroversial. It does not differentiate between housing for sale and private rented sector housing but that is unremarkable as they are not distinguishable in planning terms. It does not specify a specific dwelling mix, which would be difficult to apply with precision to the range of site sizes likely to come forward during the plan period. Rather, it requires account to be taken of the Council's most up to date evidence. That can currently be found in the amended Figure 123 of the Council's HEDNA⁴⁷ and in paragraph 5.56 of the plan. It identifies eleven categories of housing type and size which illustrates the point that a requirement in terms of precise percentages of each type could not be applied to any site other than in multiples of 100 units and still result in whole numbers of dwellings in each category. For that reason, I consider that the Council's approach to dwelling mix set out in the first part of policy H6 is sound.

Housing for older people

250. The same cannot be said of the remaining parts of policy H6. VALP paragraphs 5.57 to 5.61 summarise the section of the HEDNA which analyses

⁴⁷ Buckinghamshire HEDNA update 2016 Addendum September 2017

the housing needs of older people. It quotes from national Guidance identifying separate categories of sheltered, enhanced sheltered, extra care and registered care housing as well as residential institutions (Use Class C2). It also quotes the 2012 report *Housing Our Ageing Population* which differentiates between mainstream housing, specialised housing and Care Homes. By contrast, policy H6 itself does not seem to recognise that specialised housing and Care Homes cannot simply be “pepperpotted” as a percentage of general mainstream housing. They need to be provided collectively in institutional or quasi-institutional groupings with a substantial critical mass sufficient to pay for the support services which are provided.

251. The threshold case of a 100-dwelling development could not provide sufficient critical mass for institutional or quasi institutional housing to be provided as a percentage of general needs housing. Nor, if provided as a percentage of general needs housing would there be a sufficient number of developments of sufficient size to provide for the number of sheltered housing schemes likely to be needed. In some cases they will need specific allocations of land. Paragraph 5.59 of the plan notes the HEDNA's forecast of an increase in the institutional population of 1,160 people, suggesting a need for an additional 10-20 such institutions but VALP appears to provide for only two (as parts of allocations AGT3 and AGT4). Nor does it appear to include any allocations or policy provision for sheltered housing schemes or any of the other categories of non-mainstream housing for older people described in national Guidance. Consequently, it does not demonstrate that it provides for these housing needs of older people and so is unsound in that respect.

Accessible housing

252. In response to my Q22 the Council accepted that the final part of policy H6 required modification on the grounds that it is not possible to require a percentage of dwellings to conform to category 3 of Building Regulations approved document M whilst at the same time requiring 100% of dwellings to comply with category 2 of the same document. If it is the case that the categories are mutually inconsistent (ie that a category 3 dwelling cannot simultaneously be a category 2 dwelling) then clearly a modification is necessary. Moreover, national Guidance⁴⁸ advises that local plan policies for wheelchair accessible (Category 3) homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling, so it would be contrary to that Guidance to seek a proportion of category 3 dwellings in housing other than affordable housing to which the local authority has nomination rights.
253. It is fair to say that only a percentage of the population will need either a Category 2 or Category 3 dwelling and that requirements which apply to new build housing will do nothing to make existing housing suitable for people who have special needs. But new housing will only ever comprise a percentage of the total housing stock. To get to a position where the total housing stock

⁴⁸ Paragraph 009 Reference ID: 56-009-20150327

offers an appropriate percentage of Category 2 or Category 3 housing requires a disproportionately high percentage of new housing to be so provided.

254. However, national Guidance⁴⁹ advises that the Building Regulations for Category 2 or 3 dwellings require step-free access which precludes their provision in multi-storey flatted development without lifts. Lifts are not required and may not be viable in low-rise flatted developments so national Guidance advises that in such cases, neither of the optional requirements in part M should be applied. Compliance with national policy is a soundness test and so a modification is required to exclude low rise flatted developments above the ground floor from the requirement for Category 2 housing.
255. In response to the preceding comments, the Council has comprehensively reviewed policy H6 and proposes modifications which are necessary to provide a policy which would be both effective and justified both for older persons housing and for accessible housing [**MMs 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 168, 169 and 170**].

Student housing

256. National Guidance advises that local planning authorities should plan for sufficient student accommodation whether it consists of communal halls of residence or self-contained dwellings and whether or not it is on campus. The evidence base acknowledges that about 1.5% of the private rented sector are occupied by students. This element of student housing will be encompassed by generally applicable housing policies. No further specific provision for other kinds of student housing which are differentiated in planning terms is necessary because the only University (the Independent University of Buckingham) within the district provides accommodation for all its students.

Gypsy and travellers' needs

257. The definition of gypsies and travellers changed for planning purposes in the updated Planning Policy for Traveller Sites published in 2015. There remains uncertainty how the new definition should be applied. VALP applies a cautious approach to the large proportion of people whose status is unclear and makes provision which includes them. In the absence of certainty, I consider that such a cautious approach is sound. Any consequent overprovision could provide for those who may not be defined as gypsies but who choose to follow a gypsy way of life.
258. In response to my request for observations on certain matters relating to allocation D-AGT1, the Council reminded me that VALP makes allocations for 69 pitches to meet the first ten years of need (2016-2026). This includes all the site options identified in the Aylesbury Vale Gypsy, Traveller and Travelling Showpeople Site Assessment (2016). These 69 pitches specifically include an allocation of 5 pitches on AGT1. All the allocations listed have either been implemented or are vacant pitches available for occupation, apart from the

⁴⁹ Paragraph 010 Reference ID: 56-010-20150327

allocations at AGT1 (5 pitches) and AGT2 (5 pitches). In addition to the allocations, permission has been granted for 1 pitch at Land Opposite Red Lion, Little Tingewick and six pitches at Oaksvview Park, Boarstall in addition to the allocation there. With the housing on the sites AGT1 and AGT2 projected to start delivering from 2024/25 onwards it is anticipated the 5 gypsy and traveller pitches on each of these sites could still be delivered within the 2016-2026 time period.

259. Representations argued for the omission of the requirements for pitches on allocations AGT1 and AGT2 but it is clear that without these pitches the need identified for the first ten years of the plan would not be met. Allocation AGT1 is expected to deliver about one-eighth of all the housing allocations within Aylesbury, so it follows that it is not disproportionate for one of the gypsy and traveller sites required for Aylesbury as a whole to be located there. Consequently, the provision for gypsy pitches within those allocations is necessary for the plan to be effective and compliant with government policy. I therefore do not recommend any modification for their deletion.

260. I therefore find that the specific requirements for gypsy and traveller sites which are made both within certain allocations for housing development and also free-standing, such as at Oaksvview Park, Boarstall (where I concur with the views expressed on the appropriateness of the site contained in a recent appeal decision (APP/J0405/W/18/3193773)) would be effective in meeting the needs of gypsies and travellers.

Self-build housing

261. Amongst other matters, NPPF paragraph 50 advises that local planning authorities should plan for a mix of housing based on the needs of different groups in the community such as people wishing to build their own homes. VALP proposes to meet this objective through policy H5 requiring developments of 100 or more dwellings to provide an unspecified percentage of serviced plots for sale to self/custom builders. The percentage is to be defined on a site-by-site basis dependent on evidence of demand and viability, notwithstanding the fact that the policy has been tested for viability in the Council's viability assessment and has been found to have a neutral effect.

262. The policy would apply to allocations AGT1, AGT2, AGT3, AGT4, AGT6, AYL063, AYL115, NLV001, BUC043, BUC046, BUC051, HAD007, HAL003, WIN001 and MMO006, all of which are for developments of 100 dwellings or more. One is a town centre site where conversion of an office block is expected to deliver the housing, so individual plots are unlikely to be feasible. Another, at RAF Halton is expected to involve conversion of existing heritage assets as a substantial component of delivery. The policy makes no exceptions for feasibility.

263. By definition, all the relevant allocations are large sites attached to the major settlements of Milton Keynes, Aylesbury, Buckingham, Haddenham, Wendover and Winslow. The policy would not offer opportunities in smaller settlements but this would not diminish its effectiveness because the locations where the policy would apply appear reasonably well correlated to the geographical location of the twenty or so groups or individuals registered on the National Custom and Self Build Association's self-build portal in July 2016. There are

reported to be 209 entries on the Council's Self Build and Custom Housing Register but it is not a published register and so geographical analysis is not possible. If each of the allocations falling within the terms of the policy were to provide for ten or so plots, then the registered demand would be satisfied.

264. Representations point to the difficulties of accommodating third parties on a developer's building site and suggest that sites should be exclusively and specifically allocated for self-build housing. There is reportedly a specific allocation of a site within the Buckingham Neighbourhood Plan for self-build housing. However, in support of the effectiveness of its policy the Council reports that intending developers of allocation AGT3 are committed to the provision of 165 plots out of a total of around 1660 expected from the allocation.
265. I note that the Council substitutes the word feasibility for the word viability as a non-material modification. I conclude that the evidence indicates that this policy is sound. The plan would therefore be effective in meeting the needs of custom and self-builders.

Affordable housing

266. National Guidance advises that the types of households to be considered in housing need include those in insecure tenure because their housing is too expensive compared to disposable income. By contrast, the evidence base which underpins VALP excludes from the definition of those needing affordable housing those households which are in the private rented sector but in receipt of housing benefit,⁵⁰ notwithstanding a recognition⁵¹ that housing benefit data from the Department of Work and Pensions provides reliable, consistent and detailed information about the number of families that are unable to afford their housing costs. The Council's evidence base does this because it regards housing benefit as an income supplement which can be relied upon in the long term⁵² to allow households to afford to house themselves without recourse to affordable housing. Although this does not strictly comply with guidance as a way of defining the need for affordable housing, it represents a pragmatic appraisal of what happens in reality and so I do not regard it as unsound.
267. There are some other anomalies in the way the evidence base calculates the affordable housing need in respect of how tenants of substandard and overcrowded housing are counted. However, such anomalies are small and do not affect the overall robustness of the calculations.
268. In any event, the potential for providing affordable housing is limited by viability concerns to not much more than the figure of 4,200 dwellings identified through the needs analysis. The latter identifies a need for 24.2% of

⁵⁰ Buckinghamshire Housing and Economic Development Needs Assessment Update 2016 paragraphs 4.104-107

⁵¹ Ibid paragraph 4.39

⁵² Buckinghamshire Housing and Economic Development Needs Assessment Update 2016 Addendum September 2017 paragraph 3.9

all housing in both the South Buckinghamshire HMA and Aylesbury Vale District to be affordable⁵³. The former estimates that suitable parameters for an affordable housing target proportion are 20-30% and that a 25% target is realistic.⁵⁴ There is no convincing evidence before me which demonstrates that this would be unsound. Other than the deletion of references to the concept of Starter Homes, which has not been taken forward [MM112], no other modification to the section of the plan relating to affordable housing is necessary than those [MMs 114, 115 and 116] made in support of other issues identified in this examination to make sure that policy is stated within policy H1 rather than in supporting text and to eliminate a provision apparently applying an unauthorised charge to an applicant.

269. Of course the VALP policy requirement would apply to all housing across the plan area, including that percentage which represents displaced demand from other local authority areas, some of which may have higher requirements for affordable housing. But, as the identified need for affordable housing in Aylesbury Vale is the same as the average across the whole Central Buckinghamshire Housing Market Area, that concern does not affect the soundness of the plan or alter the conclusion reached on this issue.

270. A related concern was that some of the affordable housing provided within Aylesbury Vale would have represented a percentage of demand (including affordable housing demand) displaced from other areas but would not have satisfied that demand unless it were accessible to those who needed it. This would have been a matter for housing eligibility rules rather than the soundness of the plan but, in any event is overtaken by events now that the five Buckinghamshire authorities have been combined into one.

271. A number of representations made the point that some made Neighbourhood Plans required higher percentages and that these were justified at the time of the making of the Neighbourhood Plans. As noted elsewhere in this report, VALP does not explicitly say that it supersedes any Neighbourhood Plan policy and so they exist side by side. VALP policy H1 requires a minimum of 25% affordable homes on site and so Neighbourhood plan policies which require more than that minimum are not inconsistent with it. The Council consulted on a Modification to make it clear that policy H1 was not intended to override previously made Neighbourhood Plans which required a higher percentage of affordable housing but, for the reason explained, this modification is unnecessary and so I do not insist upon its adoption.

272. In its response to my Q79, the Council agrees that the threshold which (in line with national policy) applies the policy to sites above a certain size will imply a limiting effect on the delivery of affordable housing in smaller villages. That is as a result of the limited allocations to villages and the restrictive policies D2 and D3 which apply to them, as noted in the section of this report dealing with the spatial distribution strategy. However, it is still possible to gain affordable

⁵³ Ibid paragraph 4.98

⁵⁴ VALP viability assessment August 2017 paragraphs 3.2.11-12

housing through allocations made in a neighbourhood plan or as a rural exception in accordance with policy H2. I comment elsewhere on the need to clarify the role of future Neighbourhood Plans through the deletion of policy S8 and its replacement by new paragraph 3.75 [MM20] and the emphasis on the role of neighbourhood plans in identifying additional housing sites [MM106].

Issue 6 – The relationship with Neighbourhood Plans

273. VALP has a relationship with an exceptionally large number of Neighbourhood Plans. Paragraph 3.69 of the plan records that at the time of its drafting there were 11 “made” Neighbourhood Plans and a further 21 Neighbourhood Plan areas approved⁵⁵. Representations relating to these relationships show considerable concerns and confusion about how the relationship will work in practice where both a made Neighbourhood Plan and VALP once adopted have policies covering the same subject (e.g design standards, parking requirements, affordable housing, changes of use in employment areas or shopping parades etc).

274. Section 38(3) of the Planning and Compulsory Purchase Act 2004 defines the development plan. It includes both adopted development plan documents and made neighbourhood development plans equally. Paragraph 3.72 of VALP asserts that made Neighbourhood Plans will not replace the Local Plan but will sit alongside it, with their policies applying ahead of similar policies in the Local Plan. But that is only true of Neighbourhood Plans made after the adoption of VALP. For Neighbourhood Plans made before the adoption of VALP the reverse is true; VALP will not replace the Neighbourhood Plans but will sit alongside them, with its policies applying ahead of similar policies in the Neighbourhood Plan. For clarity and hence effectiveness and soundness a modification to paragraph 3.72 of VALP is necessary to make that clear [MM19].

275. Regulation 8(5) of the Town and Country Planning (Local Planning)(England) Regulations requires that where a local plan (e.g VALP) contains a policy that is intended to supersede another policy in the adopted development plan, it must state that fact and identify the superseded policy. (There is no equivalent provision in the Neighbourhood Planning (General) Regulations 2012 for Neighbourhood Plans to include such a statement). Although paragraph 1.1 of VALP and its Glossary entry for Development Plan asserts that VALP will replace the previously adopted Aylesbury Vale District Local Plan 2004, VALP contains no statement that its policies would supersede any policy in a previously made Neighbourhood Plan.

276. The Council gave repeated assurances throughout the examination that VALP was not intended to override made Neighbourhood Plans and so the absence of any statement identifying superseded Neighbourhood Plan policies is consistent with that intent. Some policies in VALP make specific exceptions to

⁵⁵ The Housing Delivery Study, paragraph 4.40 says 34 areas are in the programme.

their applicability in made Neighbourhood Plan areas in pursuit of this aim (e.g the first sentences of policy D2 and D3 and in policy D2(c)).

277. Since Neighbourhood Plans are meant to be in general conformity with the adopted local plan, conflicts of new Neighbourhood Plans with VALP once adopted ought not to arise. Unintended conflicts between previously made Neighbourhood Plans and VALP would be resolved through the operation of section 38(5) of the Planning and Compulsory Purchase Act 2004. If to any extent a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to become part of the development plan. As there is this statutory provision regulating the relationship between VALP and Neighbourhood Plans there is no necessity for any modification to make VALP sound except insofar as the previously mentioned modification to paragraph 3.72 is necessary for clarity and effectiveness.
278. It is easy to construct a conflict where none exists. For example, representations considered that VALP policy H1 which includes an affordable housing figure of 25% would be in conflict with Neighbourhood Plan policies requiring a higher percentage. But in fact VALP policy H1 requires "a minimum" of 25% affordable homes and so is not in conflict with Neighbourhood Plan policies which require a higher percentage.
279. If it had been the Council's intention that the more recent policies of VALP should not prevail where there is true conflict with previously made Neighbourhood Plans, then the Council would have needed to promote Modifications to policies such as H1, H6, E2, E6, T5, BE2, BE3, BE4 (and possibly others) to include words such as "Except where there is contrary policy provision in a previously made Neighbourhood Plan", so as to provide the clarity which is necessary for soundness. The council did consult on a modification to do so for affordable housing in policy H1 but, for the reasons explained in the previous paragraph, there is actually no conflict to resolve and so I do not recommend the adoption of this modification.
280. Insofar as I find VALP's policies soundly justified by the evidence, there is not the evidence before me to show that there is reason in any other case to require sound policies of the VALP to cede precedence to policies in earlier made Neighbourhood Plans which are not before me to test for soundness and which have been made in compliance with a different set of examination criteria. Accordingly, I do not require any such generally applicable modifications to be made. Other sections of my report consider individual policies on their own merits.
281. VALP sets targets for housing, retailing and employment land in policy S2, as well as making allocations in allocations policies and for housing in tables 1 and 2, for gypsies and travellers in policy S6 and tables 4 and 6, for employment in policy D5 and for retail in policy D6. Some see this approach as emasculating the role for future Neighbourhood Plans or reviews because there is no need to make further allocations in the plan period to meet the needs identified by VALP.

282. But that overlooks the specific role which VALP Table 2 expects Neighbourhood Plans to play in the planning of smaller villages and other settlements and which policy S8 expects Neighbourhood Plans to play in identifying sustainable development opportunities over and above those identified by VALP, an aim which is consistent with government policy to boost the supply of housing. Unfortunately, Policy S8 exceeds the remit of a Local Plan because it is not a policy related to the use of land with which neighbourhood plans must comply but seeks to set process requirements for Neighbourhood Plans which are set out in legislation elsewhere. Consequently, it must be deleted but Modification **MM20** provides substitute text to avoid any doubt about the plan's intentions towards Neighbourhood Plans. Modifications **MM106** and **MM107** make clear the Council's intended role for neighbourhood plans to identify housing sites in small settlements supplementary to those identified in VALP.

283. An approach which sets targets without making allocations delays the production of a complete and comprehensive development plan. There could be no guarantee that Neighbourhood Plans would ever come forward or succeed in making the allocations to meet the targets. By contrast VALP's approach brings certainty at an earlier date. There is nothing in this, or the other matters discussed in this section of my report which leads me to conclude other than that VALP's relationship with Neighbourhood Plans is sound.

Issue 7 – Whether monitoring arrangements would be effective.

284. NPPF paragraph 157 states the government's expectation that Local Plans should be drawn up over an appropriate time scale, preferably a 15-year time horizon. VALP's is nominally a twenty-year horizon 2013-2033.

285. But a number of paragraphs in the plan intimate that, in fact, it is not expected to be robust for anything like that period. An early review of the plan is first indicated in paragraph 1.62. Paragraph 3.77 asserts that on the basis of current available evidence, it is envisaged that the plan will need to be reviewed soon after adoption, citing the Oxford-Cambridge expressway and Heathrow expansion as well as more local factors. Paragraph 7.20 confirms that implications of the route of the Oxford to Cambridge expressway will be taken into account in an early review of the plan.

286. Be that as it may, to be sound a plan must be positively prepared. The submitted Plan's commitment to an early review, implicitly commencing on adoption, goes well beyond what might be thought to be a prudent flexibility to respond to national events outside the Council's control. It implies that the plan is unsound as submitted.

287. The government's response to the National Infrastructure Commission's report Partnering for Prosperity: a new deal for the Cambridge-Milton Keynes-Oxford Arc (CaMKOx) was published on 29 October 2018. Its decision on the corridor for the Oxford to Cambridge Expressway was published on 12 September 2018. Development of the expressway concept was paused in March 2020 and cancelled in March 2021 but investment to deliver the next phase of East West Rail continues. Consequently, the government's position on the arc is now clearer than when the plan was submitted. Modifications to the plan proposed by the Council reflect these events and so are necessary for the plan

to be effective [**MMs 8, 208 and 210**]. Modifications proposed by the Council in response to other issues raised in my examination, such as the housing numbers and the imbalanced spatial strategy in the north of the plan area, increase the robustness of the plan in the context of the CaMKOx growth arc and reduce any pressing need for urgent review. Consequently, the references to the need for an early review are inappropriate and should be deleted [**MMs 4, 6, 8, 16, 21, 22, 26**].

288. Representations to these modifications seeking to reinstate a commitment to an early review are largely based on changes to plan making subsequently introduced but NPPF2019 has specific transitional arrangements for previously prepared plans to continue. The passage of time inevitably brings new considerations but regulation 10A of the Town and Country Planning (Local Planning)(England) Regulations 2012 sets a standard period for review. The representations do not adduce new emerging changes in circumstances not considered previously.
289. It is, nevertheless, good practice that a plan be regularly monitored and reviewed. National Guidance advises that local planning authorities must publish, at least annually, information that shows how the implementation of policies in the plan is progressing. Policy S9 states that this will be done and so complies to that extent with national policy. National Guidance also advises that the local planning authority should review the relevance of the Local Plan at regular intervals to assess whether some or all of it may need updating and that most Local Plans are likely to require updating in whole or in part at least every five years. Policy S9 states that this will be done and so complies to that extent with national policy.
290. There is not normally any redress if a local planning authority fails to review or update a plan when necessary but policy S9 sets out four circumstances in which proposals for alternative sustainable sites will be favourably considered in any event. It is necessary to make it clear that it is progress on housing supply in general, not just on allocations which may trigger this provision. Subject to an adjustment to achieve that clarity [**MM26**], suggested by the Council, which I endorse, I consider that this policy is soundly conceived and would be effective in ensuring that a plan rendered out of date by unexpected events would not be a bar to appropriate development taking place.

Issue 8 – Whether transport policies and proposals are justified.

291. At first glance, VALP has just seven policies concerned with transport and no proposals. Two of these policies, T2 and T3, are safeguarding policies. One, T4, requires developments to mitigate their own transport effects. Two others, T5 and T7, set standards for parking and electric vehicle charging points. Elsewhere in my report I note that it is unsound for these to be delegated to SPD, as these policies do. One further policy protects footpath and cycle routes (with considerable overlap with policy C4).
292. But, on closer inspection, policies T1 and T6(a) require developments to implement the proposals in the Buckinghamshire Local Transport Plan 4, the Aylesbury Transport Strategy, the Buckingham Transport Strategy and any county-wide or local cycle strategy. Yet, none of these proposals are specified in the plan. Nor have they been subject to the public consultation procedures

specified for local plans. The Buckinghamshire Local Transport Plan 4 is not even part of the evidence base for VALP.

293. NPPF (2012) paragraph 7 is quite clear that it is the role of the planning system, amongst other things, to identify and coordinate development requirements, including the provision of infrastructure. National Guidance advises that the Local Plan should make clear what is intended to happen in the area over the life of the plan, where and when this will occur and how it will be delivered.⁵⁶ It points out the need to identify the short, medium and long-term transport proposals across all modes as a key issue in developing the transport evidence base to support the local plan.⁵⁷
294. It advises that the Local Plan should make clear, for at least the first 5 years, what infrastructure is required, who is going to fund and provide it and how it relates to the anticipated rate and phasing of development. The detail concerning planned infrastructure provision can be set out in a supporting document such as an infrastructure delivery programme that can be updated regularly. However the key infrastructure requirements on which delivery of the plan depends should be contained in the Local Plan itself.⁵⁸ VALP does not do this and so is unsound as submitted.
295. In a number of instances, individual allocations provide an insight into what is proposed in these various external transport plans and strategies. Allocations AGT1, AGT2, AGT3, AGT4, AGT6 all refer to the provision of various link roads around Aylesbury, NLV001 requires various highway improvements and reservations connected with Milton Keynes and during a hearing session it became apparent that BUC051 is dependent on a road proposal contained within the Buckingham Transport Strategy but nowhere mentioned in VALP. It is not clear whether there would be other proposals, included in the various transport strategies but not shown in VALP, to which developments would need to comply or implement in accordance with policies T1, T2 and T3.
296. In response to the comments in the preceding paragraph and at my request, the Council proposes modifications, which I recommend for adoption, to insert the key infrastructure requirements upon which the delivery of VALP depends and to delete the BUC051 proposal which would have been dependent on the construction of a Buckingham Western Relief Road which the scale of development would have been insufficient to fund. These modifications are necessary to the soundness of the plan [**MMs 83, 202, 203, 204, 205, 206, 207, 208, 209 and 210**] to show that it has been positively prepared.
297. National Guidance calls for the preparation of a transport assessment at a number of stages in the preparation of a local plan, the first being as part of the initial evidence base in terms of issues and opportunities.⁵⁹ This stage seems to have been omitted from the process of preparing VALP which seems

⁵⁶ Paragraph: 002 Reference ID: 12-002-20140306

⁵⁷ Paragraph: 003 Reference ID: 54-003-20141010

⁵⁸ Paragraph: 018 Reference ID: 12-018-20140306

⁵⁹ Guidance Paragraph: 004 Reference ID: 54-004-20141010

to have started with the second stage described in national Guidance, namely as part of the options testing during which various iterations of Countywide Local Plan modelling were undertaken by Jacobs on behalf of Buckinghamshire County Council. The introduction to the first of these dated 6 July 2016 explains that Jacobs has been commissioned to assess the transport impact of the emerging local plan proposals. The model outputs show whether or not there has been betterment or detriment as a result of the tested scenarios in terms of highway congestion, travel times and demand flow.

298. The second modelling report (March 2017) examines the same three development scenarios (refined to reflect changes in the component development schemes through the passage of time) but with the addition of various transport mitigations. These transport mitigation projects derive from long shopping lists of projects sought by Buckinghamshire Districts and the County Council. The selection has been made with a view to mitigating the impacts identified by the 2016 report but it is not clear that the schemes were originally conceived with that purpose in mind. In consequence, the nature of the issues or problems which the transport schemes are seeking to address is hidden. Again, the model outputs show whether there has been betterment or detriment to the highway network in terms of congestion and travel time.
299. A third modelling report (August 2017) tested the chosen development scenario of the submitted plan against two mitigation packages. Amongst other differences, one (run2) included north-eastern, western and south-western link roads around Aylesbury, the other (run1) excluded them. Run 2 also included proposals from the Buckingham Transport Strategy, whereas run 1 excluded them. Again the model outputs show whether there has been betterment or detriment to the highway network in terms of congestion and travel time. Neither run1 nor run2 reflect precisely the transport proposals which are implicit within VALP as subsequently submitted but there is no reason why they should; they simply exist to inform the selection of proposals, not to prescribe them.
300. The models are criticised for not being WebTAG (Web-based Transport Analysis Guidance) compliant but national Guidance⁶⁰ advises that for most Local Plan assessments the full methodology recommended by WebTAG will not be appropriate. Although the model is not well calibrated⁶¹, I am satisfied that the approach chosen fulfils the requirements of Guidance by enabling a comparative analysis of the transport effects of the proposed allocations in the context of two alternative scenarios – “with development” and “without development”. Overall, it appraises a greater quantity of development than actually proposed in VALP, more akin to that which will result from my recommendations and so is a robust evaluation of the transport effects of the quantity of development proposed.

⁶⁰ Guidance Paragraph: 010 Reference ID: 54-010-20141010

⁶¹ Calibration is a documented comparison of the outputs of the model against a traceable reference of real-life outcomes.

301. In contrast to the Jacobs modelling, the Aylesbury Transport Strategy commissioned from AECOM and published in January 2017 asserts that it is intended to address current issues on the transport network. It does start with the transport assessment envisaged by National Guidance. It identifies six objectives, including improving transport connectivity and accessibility within Aylesbury Town and to other urban areas outside Aylesbury, improving air quality, journey time reliability and safety and making public transport more attractive. Its SWOT (Strengths, Weaknesses, Opportunities, Threats) analysis identifies sixteen issues. The Strategy compiles a list of transport improvements to address these issues and applies the outputs of the Jacobs modelling, insofar as appropriate to the suggestions listed, before concluding that overall the result indicates how the proposed new link roads around Aylesbury can help to alleviate traffic on the existing inner roads, providing space for infrastructure to support alternative modes on those roads. The Buckingham Transport Strategy also commissioned from AECOM and published in January 2017 follows a similar pattern of review, analysis and plan.
302. VALP itself explains (in paragraph 1.17) that the main focus for road improvements will be in relation to Aylesbury, to improve the circulation of traffic around the town. The link roads can be recognised in pursuit of this objective. The paragraph also explains that there will also need to be a focus on improving north/south connectivity to enable the district to function better in relation to national highway networks and rail networks but there is no identifiable highway proposal in pursuit of this objective. Paragraph 7.2 of the plan explains that the creation of a new highway network will allow for more pedestrian and cycle friendly town centres in Buckingham and Aylesbury.
303. In response to my Q88 the Council provided a comprehensive list of all the highway link roads around Aylesbury, described their delivery mechanisms and confirmed that, in relation to Aylesbury, the reasons for the various highway road links were to deal with high volumes of through traffic in the town centre⁶², congestion along radial routes, high volumes of HGVs particularly affecting Air Quality Management Areas and to provide an opportunity for the reallocation of town centre space to pedestrians, cyclists and bus priorities. My conclusions are that, although the justification for the proposals has been arrived at somewhat late in the day, and perhaps through a process of post-rationalisation, nevertheless, the evidence shows that in general, although unlikely to solve all of Aylesbury's problems, the schemes are justified and so, sound.
304. I have noted above that none of the schemes are shown on the submission policies map and only some are referred to within the body of text referring to allocation sites, never as proposals in their own right and that this is unsound because it would conflict with both NPPF policy and national planning Guidance on the role and purpose of a Local Plan and therefore requires modification. In

⁶² Different figures about the percentage of through traffic are likely to be explained by different definitions of what constitutes "through"; the Council clearly limiting itself to traffic through the town centre (my emphasis) whereas others were implying traffic passing across Aylesbury from outside the urban area to outside the urban area.

some cases this in turn raises questions of sustainability appraisal and flood risk. An example is the case of the Eastern Link Road passing through allocation AGT3.

305. VALP shows no alignment for this link road; the requirement in the allocation is for a Strategic Link Road connecting with the ELR(N) and the A41 Aston Clinton Road. Yet, within the evidence base, several possible alignments of this road are shown. That on figure 2 of the Cumulative Growth Impact Final Report by AECOM (June 2017) shows a line swinging sharply to the east immediately south of crossing the Grand Union Canal, whereas that on figures 17, 22 and 24 of the same document shows a much more southerly alignment superimposed over a much more gently curved alignment which I believe represents the developer's proposal for the site and which appears to be reflected in the alignment shown on figure 21.
306. Figure 5-F of the Jacobs Countywide modelling of March 2017 seems to have adopted the developer's alignment as do figures 5-E and 5-F of the August local plan modelling report and the plan submitted in response to my Q88. By contrast, figures 6.3, 6.21 and 6.23 of the AECOM Aylesbury Transport Strategy of January 2017 matches the alignment shown in the majority of cases in their June 2017 Cumulative Growth report. But, on the other hand, figures 6.5, 6.7, 6.8, 6.9, 6.10, 6.11, 6.12 and 6.13 of their January report match the alignment shown on the Jacobs reports.
307. I take no view on whether VALP should show a diagrammatic or a precise alignment for this, or any other link road; planning is not precision engineering. But Section 19 of the Planning and Compulsory Purchase Act 2004 requires a local planning authority to carry out a sustainability appraisal of each of the proposals in a local plan during its preparation and s39 of the same act requires that the local planning authority must do so with the objective of contributing to the objective of sustainable development. NPPF paragraph 152 advises that significant impacts on any of the dimensions of sustainable development should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. NPPF paragraph 182 advises that to be justified a plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. Sustainability appraisals incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 including the selection and evaluation of reasonable alternatives but do not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the Local Plan.
308. Representations argued that one of the three alignments of the link road on allocation AGT3 was the most appropriate because it had least effect on the functional flood plain. It is not for me to carry out a Sustainability Appraisal in the first instance; that is for the Council. But I observe that the route favoured by that representation, whilst minimising the length of road passing through the flood plain would also have the consequential effect of reducing the extent of land not in the flood plain available for housing and so the choice of the most appropriate strategy is not necessarily straightforward.

309. The Council put forward modifications to the plan to show alignments for the various link roads around Aylesbury. It carried out a further Sustainability Appraisal consequent on the modifications to the plan which it has put forward. It advises that where specific alignments are shown for transport proposals, the proposed alignment and reasonable alternatives to it have been subject to sustainability appraisal, except where these are already approved as part of a planning permission. Such is the case for D-AGT6 Kingsbrook.
310. Following the publication of these modifications, which made clear in the plan for the first time the nature of its transport proposals, and in consideration of representations made, the Council proposed further modifications. These omitted two of the link roads around Aylesbury (the North East Link Road (NELR) and the Western Link Road (WLR)) [**MMs 210, 285 and 286**]. The omissions attracted further representations. I held a further hearing session to explore the representations made. This did not lead me to any general conclusion other than those already reported above.
311. I accept the omission of the two link roads on the grounds that they have no supporting development to support their funding and there is no business case to support their inclusion in the plan and so, they would be undeliverable. A further run of the county-wide transport model shows that their omission would not worsen current congestion levels and so, their inclusion in the plan is not necessary for it to be found sound. Their omission is justified but the inclusion of the other link roads remains justified.
312. Despite any theoretical shortcomings in the methods used to generate the transport proposals, they have been pragmatically tested by modelling which is adequate for the purpose of a local plan examination. The proposals are shown to result in a situation that would be better than one without the proposals and so, they would be justified and are therefore, sound.

Issue 9 – Whether the local plan would be effective in securing good design

313. The government attaches great importance to the design of the built environment. It is a key aspect of sustainable development. It is not just about appearances, although visual appearance and the architecture of individual buildings are very important factors; it is about ensuring that developments function well, optimise the potential of a site to accommodate development and create safe and accessible environments.
314. VALP contains a plethora of policies which touch upon one or more aspects of design. As well as the obvious ones such as H6 (Housing mix), H7 (Dwelling sizes), T5 (Vehicle Parking), T7 (Electric Vehicle Infrastructure), BE2 (Design of new development), BE3 (protection of residents' amenity), BE4 (Density of new development), NE2 (Biodiversity and geodiversity), NE5 (Landscape character), NE6 (Pollution, air quality and contaminated land), NE9 (Trees, hedgerows and woodlands), C1 (Conversion of rural buildings), C3 (Renewable energy), I1 (Green infrastructure), I2 (Sports and recreation) and I4 (Flooding), each allocation policy includes a section headed "site criteria" which frequently specify design requirements, as does the overarching policy D1 for the delivery of Aylesbury Garden Town.

315. A common feature of many (not all) of these policies is that they are vague, unclear or rely excessively on supplementary planning documents (SPD) for their meaning or effect, in some cases requiring adherence to a supplementary planning document, many of which have yet to be prepared. National Guidance is clear that supplementary planning documents should build upon and provide more detailed advice or guidance on the policies in the plan but they should not themselves introduce new policy requirements which have not been the subject of examination. A Local Plan cannot require proposals to comply with a document which is not itself a Local Plan.
316. The test which I apply is one of effectiveness; if a policy is sufficient of itself to inform a developer or a local authority's development manager that a proposal ought or ought not to be given planning permission, then it is effective and has been soundly prepared. But if it is necessary, having read the policy, still to refer to another document, such as SPD, to reach that conclusion, then it follows that the policy is not effective and has not been soundly prepared. Too many of the design policies in VALP fall into this latter category.
317. I am relatively content with the level of specificity contained within policies H1 (Affordable Housing), NE2 (Biodiversity and geodiversity), NE5 (Landscape character), NE6 (Pollution, air quality and contaminated land), NE9 (Trees, hedgerows and woodlands), C1 (conversion of rural buildings), C3 (renewable energy) and I4 (flooding). However, in addition to the suggested changes to supplementary planning document references set out in Examination Document 129, policies D1 (Aylesbury Garden Town), H6 (Housing Mix), T5 (vehicle parking), T7 (Electric Vehicle Infrastructure), BE2 (Design of New Development), BE3 (protection of residents' amenity) BE4 (Density of new development), I1 (Green Infrastructure), I2 (sports and recreation) and many of the site allocation policies require Modifications [**MMs 5, 26A, 27A, 28, 31, 32, 33, 34, 35, 39, 41, 45, 46, 48, 52, 55, 57, 61, 65, 75, 88, 115, 152, 159, 170, 213, 214, 216, 217, 220, 221, 222, 223, 224, 246, 254, 255, 257, 260, 261, 262, 268, 270, 278, 279, 280 and 281**], which identify those elements of their related SPDs which set policy requirements or standards and which therefore need to be brought into the plan itself to make it effective. Supporting text also needs to be revised to match.
318. In consequence of these changes, a number of SPDs become unnecessary because their provisions (or proposed provisions) would now form part of the plan itself. It was reported during the examination Hearing sessions that 23 SPDs are referenced within VALP. This number would reduce to 8 as a consequence of the modifications. A modification to the list of intended SPDs is necessary to reflect this reduction in their numbers. [**MM281 and appendix E**].
319. One design policy (H7 Dwelling sizes), (which seeks to require new dwellings and extensions to dwellings to provide sufficient internal space for normal residential activities commensurate in size with the expected occupancy of the dwelling) has no justification, as the Council frankly acknowledges in its response to my Question 112. Moreover, it is contrary to government policy set out in a Written Ministerial Statement dated 25 March 2015 which advises that from the date the Deregulation Bill 2015 is given Royal Assent, local planning authorities should not set in their Local Plans or supplementary planning documents any additional local technical standards or requirements

relating to the internal layout of new dwellings. One of the tests of soundness of a Local Plan is consistency with national policy. Policy H7 should therefore be deleted from the plan through Main Modification **MM171**.

320. In similar vein, many responses to my Questions made reference to provisions within the Infrastructure Delivery Plan (IDP). This reveals that the latter makes many provisions relating to the functional requirements for development which VALP does not. Such inconsistency would render VALP ineffective if not corrected and so a number of modifications are necessary to do so. [MMs 18, 202, 203, 204, 205, 206, 208, 210 and 215].

321. In a number of cases, policy requirements are found not within the policies themselves but within supporting text. This would not be effective. A number of modifications are necessary to translate policy requirements from supporting text into policies themselves or to make the justification more explicit [MMs 17, 34, 35, 39, 40, 41, 46, 47, 48, 53, 54, 55, 56, 57, 59, 60, 61, 72, 73, 74, 87, 88, 108, 109, 113, 115, 117, 118, 148, 149, 177, 178, 179, 180, 181, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 200, 201, 207, 210, 211, 212, 214, 224, 228, 232, 237, 238, 239, 240, 241, 242, 243, 244, 245, 262, 269, 272, 273, 274 and 275].

Issue 10 – Whether policies for the allocation and retention of employment land are justified by analysis of need

322. Policy S2 (bullet 5) records provision for the identified needs of 27 hectares of employment land and additional provision of some employment land to contribute to the employment needs of the wider economic market area. This policy is effected through policy D5, the designation of three Enterprise Zones (Silverstone in the north of the district, Westcott to the west of the District and Arla/Woodlands to the east of Aylesbury itself) and through specific site allocations around Aylesbury town (AGT3, 4, 5 and 6) and south-west of Milton Keynes (NLV001). Policy D5 also supports economic development through the intensification or extension of existing premises, through farm diversification schemes, through the appropriate re-use or redevelopment of an existing building or in a rural location where that is essential for the type of business concerned.

323. Existing employment provision in twelve key employment sites (including the three Enterprise Zones but not including the employment sites which would result from the development allocations) is identified for protection through policy E1. The release of other employment sites for non-employment use⁶³ would normally be permitted by policy E2 where there had been suitable marketing for an employment re-use for two years without takers, where development would not prejudice the efficient and effective use of the

⁶³ As published, the plan stated “for employment use” but a correction (PIC024) published as part of the submitted plan reversed the meaning of the policy. It is this corrected version which I have considered in the examination.

remainder of the employment area and where there is a substantial over-supply of suitable alternative employment sites in the local area.

324. The Council's evidence base (paragraph 83 of its Employment Topic Paper) frankly acknowledges that the allocations, supplemented by existing commitments in the form of outstanding planning permissions, would result in a supply of 100ha of employment land, well in excess of the 27ha recommended by its consultants in the Buckinghamshire Housing and Economic Development Needs Assessment Update 2016 and its Addendum 2017.

325. It justifies this overprovision with seven arguments;

- There is under provision in other parts of the Functional Economic Market Area (FEMA)
- The supply within the FEMA would be brought into balance by the oversupply within Aylesbury Vale
- There is a need to provide mixed use development offering local employment
- The Enterprise Zone status of some overprovision
- The conflicting evidence of economic forecasts and market behaviour
- The potential effects of East-West Rail and the Oxford-Cambridge Expressway
- The need to improve the quality of premises

In the following paragraphs, I look at each in turn.

Conflicting evidence

326. Aylesbury Vale, by itself, is not a self-contained economic market area. The administrative area of Aylesbury Vale is divided between four Functional Economic Market Areas; Oxfordshire, Milton Keynes, Hertfordshire and Central Buckinghamshire. The most populous segment, forming about a third of the geographical area of the District, forms a relatively self-contained sub-FEMA within the Central Bucks FEMA. For the convenience of data assembly a surrogate "best fit" FEMA, based on the combined area of Aylesbury Vale, Wycombe, Chiltern and South Bucks District Council areas, is used in the evidence base but that should not blind us to the fact that, in practice, large areas of the north and west of Aylesbury Vale District would be subject to the economic realities of different FEMAs to that used for the purposes of the evidence base.

327. Even without that complication, the underlying evidence is confusing and contradictory. The various available economic forecasts project similar overall increases in the demand for employment land for Central Buckinghamshire FEMA as a whole, differing only in their predictions of its make-up between offices, industry and warehousing. On the other hand, trend based analysis (which would include the depressive effects of the most recent recession)

projects a reduced growth of offices, a greater decline of industry, a contrasting direction of travel (decline rather than growth) for the warehousing sector and so an overall decline in the demand for employment land.

328. Moreover, as the Council's HEDNA Addendum of September 2017 notes "it has become apparent that there is a mismatch between what the economic forecasts in the HEDNA are showing and what the market is prepared to deliver on the ground." Nevertheless, the population (and hence the labour supply needing the provision of jobs) continues to grow.

329. In the circumstances, it is hard not to agree with the cautionary advice of the Council's consultants; "Given the market uncertainties at present, and the historic picture in Buckinghamshire, perhaps a prudent approach would be to avoid allocating or releasing significant amounts of employment land." In effect, that is what the outcome would be of the relatively limited new allocations and the relatively guarded policy for the release of existing employment land. I therefore conclude that the amount of employment land allocated within the plan is justified in principle, notwithstanding the significant oversupply created by outstanding commitments.

330. With that conclusion in mind, the other reasons advanced for the provision or retention of an oversupply of employment land within Aylesbury Vale become less significant. Nevertheless, I have examined them.

The FEMA

331. One is the concept that oversupply in Aylesbury Vale will help to make up shortfalls arising elsewhere within the FEMA⁶⁴. I asked for evidence of whether the shortage of available employment land and premises in the south of Buckinghamshire was long-standing because, if it had been and there was no evidence of take-up being displaced to Aylesbury Vale, that would tend to show that this reason being advanced in favour of the Council's policies was unsound. Evidence in the form of CoStar data over ten years was submitted by Turley on behalf of SEGRO plc, for which I am grateful.

332. For the first part of the period, this does not support the Council's argument. But from about 2014/15 onwards there is consistency in the data for all three components of the southern sub-FEMA. Their warehouse vacancy rates dropped to 4% or lower indicating a greater and more consistent shortage across the whole of the southern sub-FEMA. At the same time, that for Aylesbury Vale also dropped, to a little more than 6%. At the same time there have been parallel reductions in the warehousing availability rate in both Aylesbury (from a much higher level) and Wycombe. There has been an abrupt increase in asking prices in Wycombe from about 2015 onwards and a gentler increase in Aylesbury to about two-thirds of that sought in Wycombe. These are all indications that a consistent shortage of warehousing space

⁶⁴ Justified in the final sentence of supporting paragraph 3.13 and in supporting paragraph 4.172 of the submitted plan as well as in the Council's Employment Topic Paper

across the southern sub-FEMA took strong effect from about that date simultaneously with a lesser reduction in availability in Aylesbury Vale.

333. I agree that the data available is not conclusive and may simply indicate a general sign of growing confidence in the market amongst warehouse related businesses but it is not inconsistent with the theory that shortages of employment land in Wycombe and other parts of the southern sub-FEMA will result in (perhaps sub-optimal) displacement of demand to Aylesbury Vale, thus helping to justify the continued provision and retention of an overprovision there.
334. Even if representations made to the submitted Wycombe Local Plan had succeeded in persuading the examiner of that plan to require the Council to identify more land for employment uses in that plan, that would not render unsound the policies in VALP because they do not depend on that justification alone but also on other reasons to which I now turn.

The need for mixed use development

335. The need for mixed use development to provide local employment responds to the ninth and eleventh bullet points of paragraph 17 of the NPPF⁶⁵. This establishes that one of the government's core planning principles is to promote mixed use developments. Another is to manage patterns of growth actively to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable. This last is elaborated in paragraphs 37 and 38 of the NPPF which advises that planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.
336. Consistency with government policy is one of the criteria by which a plan is found sound. Insofar as allocations such as AGT5 (Berryfields) require mixed use development in accord with this aspect of government policy, it cannot be found unsound even though it may contribute to an oversupply of employment land. These allocations are not designated as key employment sites within the plan and so the permissive policy E2 would apply to proposals for their release for non-employment uses, not the protective policy E1.

Enterprise Zones

337. The Council points out that some element of overprovision results from the designation of Enterprise Zones within the District. The Council itself does not point out but I observe that Silverstone Enterprise Zone (EZ) is located at the extreme northern tip of the district, well outside the Central Buckinghamshire FEMA and its Aylesbury town sub-FEMA. It is on the border between the Milton Keynes and Oxfordshire FEMAs. Likewise, Westcott EZ is well located for the Oxfordshire FEMA.

⁶⁵ References to the NPPF in this report are to the March 2012 edition of the NPPF unless specifically stated otherwise

338. Although there has been no request under the Duty to Cooperate for VALP to make provision for employment land to serve those FEMAs and, for the purposes of statistical convenience they are included within the surrogate "best fit" Central Buckinghamshire FEMA, they would, in practice, benefit from the economic growth prospects of those two other FEMAs. They have, as noted above, different growth prospects than those of Central Buckinghamshire so I do not find unsound their inclusion within the list of key employment sites protected by policy E1 even though that would notionally contribute to any oversupply of accommodation within the Aylesbury Town sub-FEMA part of the "best fit" Central Buckinghamshire surrogate FEMA.

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339. Lastly, the Council prays in aid the potential effects of East-West Rail and the (now cancelled) Oxford-Cambridge Expressway. The National Infrastructure Commission's (NIC) report *Partnering for Prosperity: a new deal for the Cambridge-Milton Keynes-Oxford Arc* is not included in VALP's evidence base but it is referenced in government policy both in the *Autumn Budget November 2017* and in a policy paper, *Helping the Cambridge-Milton Keynes-Oxford corridor reach its potential* also published in November 2017.

340. This last records that the government's vision for the corridor is to stimulate economic growth in the national interest. It notes estimates by the NIC that, with the right interventions, annual output of the corridor in 2050 could be approximately double the growth expected without intervention. Although 2050 is well beyond the end date of VALP the effects of the growth corridor can be expected to start to be experienced before then and so it is justified for VALP to take it into account.

Conclusion

341. I therefore conclude that, in general terms, the plan's policies for the allocation and retention of employment land are sound without modifications other than those to which the Council has committed in response to other of my questions.

Issue 11 – Whether policies towards retailing provision would be justified or effective

342. The plan includes a target within policy D6 for the development of additional retail provision, justified by reference to the Aylesbury Vale retail study 2015 and the Aylesbury Town Centre Retail Capacity Update (December 2016), both summarised in a table in the text (paragraph 4.187). I concur with the Council's explanation for covering retail needs for 15 years rather than 20 because of the uncertainty of prediction in the later years of the plan. It is not a sufficient reason to find the plan unsound.

343. Certain allocations (eg D-AGT1, D-AGT2, D-AGT3, D-AGT4, D-AGT5, D-NLV001, D-HAL003) include retailing as part of a mixed use local centre. One town centre allocation requires 5,000 sq m comparison retail floorspace (D-AYL052). Another requires the retention of ground floor retail use (D-AYL063). Its submission policies inset maps also record commitments. None of these policy or allocation provisions is controversial, except for two relatively minor issues, concerned with the boundaries of Aylesbury Town

Centre and its Primary Shopping Area and with the criteria by which a sequential test would be required for proposals sited outside town centres.

Whether the boundaries for Aylesbury Town Centre and its Primary Shopping Area are justified

344. The third bullet point of NPPF paragraph 23 advises that in drawing up Local Plans, local planning authorities should define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres and set policies that make clear which uses will be permitted in such locations. Compared with the adopted Aylesbury Vale District Local Plan 2004, VALP proposes to define a much larger town centre for Aylesbury, a marginally adjusted Primary Shopping Area and no changes to the primary shopping frontage.
345. The town centre boundary in the adopted local plan aligned with the A41 and A418 roads which circumscribe the core of the town. The proposed new boundary includes areas lying outside that ring of roads to include the railway station, retail parks originally constructed as "edge of centre" developments, the town's Aqua Vale Swimming and Fitness Centre and Vale Park, the town's new Waterside Theatre and adjoining hotel, a campus of Buckingham College, recently constructed office buildings and high intensity residential developments.
346. The NPPF advises, in its Glossary, that the town centre is an area defined on the local authority's proposals map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. Town centre uses are described in the fifth bullet of NPPF paragraph 23 as including retail, leisure, commercial, office, tourism, cultural, community and residential development.
347. From this definition it can be seen that the uses encompassed within the newly defined town centre boundary are town centre uses. If not all adjacent to the primary shopping area, they are at least, with the exception of the Buckingham College campus, in close proximity to it. There is little immediately outside the new boundary which could be described as an obvious town centre use and so I conclude that the new town centre boundary is justified and therefore, sound. There is, however, no definition of a Defined Town Centre in the Plan's glossary and so a modification is necessary to provide one [MM283] for the sake of effectiveness.
348. Despite identifying on the Central Aylesbury Inset Map a site for a mixed use town centre development which policy D7 describes as based principally on retail uses with an element of residential and other town centre uses at an appropriate scale and location, only a part of it (coinciding with the primary shopping area definition of the 2004 plan) is defined as within the primary shopping area. Although primary and secondary shopping frontages within that development site obviously cannot be defined until a scheme is designed and built, it is inconsistent, and therefore unsound, for the plan to propose a development within the town centre principally for retail uses (quantified in policy D6) yet not adjust the primary shopping area boundary to encompass it. A modification is therefore required [MM286].

349. Between them, policies D6, D7 and D8 govern proposals for new retail development within Aylesbury Town Centre. Policy E6 governs new uses within primary and secondary frontages. There does not appear to be any specific policy governing new uses (implying loss of retail) outside the primary or secondary frontages yet within the primary shopping area other than (possibly) the second paragraph of policy D6. Although such a policy could only apply to a very limited number of premises (on the south-west side of Temple Street and the north-west side of Bourbon Street) this is a theoretical lacuna within the plan, and so I find that its absence should be rectified by Modification [MM188] so as to provide effectiveness against all possibilities.
350. The Council accepts that commitment site AYL058 is incorrectly shown on the Aylesbury Inset Map and proposes modification **MM286**. In response to Natural England comments it proposes modifications **MM110 and MM111** to policies D7 and D8 to secure compliance with paragraph 114 of the NPPF. These are necessary to comply with government policy. The Council has explained that the apparent discrepancies between statements concerning proposed upgrading of the existing bus station and its replacement in a transport hub relate to short term and long-term aspirations so there is no indication of unsoundness which requires a modification to the plan.

Whether policy E5 (Development outside town centres) is justified or effective

351. As submitted, the policy states that a sequential test will be applied to all main town centre uses. It then goes on to state a set of criteria applicable to retailing proposals alone. One of these (criterion b) duplicates the sequential test and so is unnecessary. Two others seek to introduce the types of goods sold as a criterion of acceptability whereas it is the scale of the proposal relative to the scale of the impacted town centre which ought to be the consideration. Two others set process requirements for the submission of applications rather than conditions which a completed development must meet. These include a threshold for impact assessment which is much lower than the default set in NPPF paragraph 26 and justified less by a consideration of the size of the town centres likely to be impacted and more by a consideration of the size of proposal frequently received in the District.
352. The Council has submitted two suggested modifications [MMs 183 and 185] to the plan to meet these criticisms. They would refine the sequential test and apply it only to defined town centres. The threshold for impact assessment would still be lower than the national default but is justified by up to date evidence and would be related to the scale of the impacted town centre. The types of goods sold would no longer figure as a criterion. These modifications are necessary to justify the policy and to make it effective.
353. The aim of this policy, to direct town centre uses to town centres, is reinforced by clause (c) of policy E1 but that lacks clarity. A modification [MM176] is necessary to make it clear that the policy to protect key employment sites from the incursion of town centre uses does not apply to those town centre uses in Use Classes E, B2 or B8 which properly belong in key employment sites and enterprise zones.

Issue 12 – whether policies for the provision of open space are based on robust and up to date assessments

354. In respect of a robust and up to date assessment of open space needs, reference is made in policy I1 which requires the provision of new green infrastructure by reference to the Council's assessment of Open Space, Sports and Recreation Needs for Aylesbury Vale (2017). But a similar reference is lacking from policy I2 which requires sport and recreation provision in new development and from policy I3 which requires the provision of new community facilities. Modifications are therefore required.
355. The Council has responded with a comprehensive review of the open space provisions of chapter 11 of the Plan. Following representations about the definition of green infrastructure in the proposed modifications, the Council adjusted their wording. I agree that the modifications proposed, adjusted where appropriate in line with the Council's suggestions [MMs 29, 30, 246, 247, 248, 249, 254, 255, 256, 257, 260, 261, 262, 268, 269, 270, 271, 279, and 280] are necessary for soundness and so, recommend that they be included in the plan for adoption.

Issue 13 – Whether policy NE2 (Biodiversity and Geodiversity) is justified and effective

356. VALP contains two policies concerned with the protection of fauna, flora, geological and physiographical features. One (NE1) is concerned only with protected sites. SSSIs and ancient woodlands are specifically mentioned in the policy itself but supporting text refers also to local geological sites of regional significance and local nature reserves. The other policy (NE2) is concerned with biodiversity and geodiversity in general but it contains specific sections applying only to internationally designated Special Areas of Conservation (not specifically referenced in policy NE1) and to SSSIs.
357. There is duplication and overlap which is unclear and therefore unlikely to be effective and so, not sound. The two policies and their supporting text should be merged into a single policy [MMs 224, 228 and 232], eliminating the distinction between greenfield and brownfield sites in criteria (a) and (i) of NE2 which, at the hearing sessions, the Council accepted was an unnecessary distinction and including the acceptance of mitigation within criterion (g) of NE2. These modifications have been refined in response to representations made. Supplementary modifications [MMs 235 and 236] to policies NE8 and NE9 to require agricultural land classification assessments and protection for Ancient Woodland are also necessary to make the Plan clear and effective.

Issue 14 – Whether the designations of Areas of Attractive Landscape and Local Landscape Areas are justified.

358. Amongst other matters, NPPF paragraph 109 advises that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes. NPPF paragraph 113 goes on to advise that local planning authorities should set criteria-based policies against which proposals for any development on or affecting landscape areas (amongst other concerns) will be judged. It advises that distinctions should be made between the hierarchy of international, national and locally designated sites so that protection is commensurate with their status.
359. VALP puts this advice into practice in relation to landscape by recognising at the highest level in the hierarchy the Chilterns AONB designated as a

nationally important landscape. This is given its own criteria-based policy (NE4).

360. Lower down the hierarchy are two local designations recognised by VALP. Of the two, Areas of Attractive Landscape (AALs) are said to have the greater significance in the hierarchy, Local Landscape Areas (LLAs) the lesser. Policy NE5 sets a criteria based policy applicable to both local designations and also to the remaining undesignated landscape of the District. It requires all development proposals to have regard to the Council's Landscape Character Assessment (LCA) of 2008 (amended 2015). The additional criteria applicable to the two local designations are that proposed development therein should have particular regard to their character defined in a more recent (2016) report. This seems no more than is commensurate with their locally designated status. Mitigation of harm would be sought in both designated and undesignated landscapes.
361. The two major criticisms of the justification of policy NE5 are that it is based on an evidence base now over ten years old, applying the methodology of its time, and that, in places, the landscape has changed, invalidating its findings. It is true that both national policy and landscape assessment methodology have changed over time but essentially, the evidence base recognises this. It is therefore, not invalid. NPPF advice emphasises criteria-based policies. Policy NE5 is such a policy, applying seven criteria with reference to the 2008 Landscape Character Assessment and to the 2016 report *Defining the Special Qualities of Local Landscape Designations in Aylesbury Vale District*.
362. Although the local landscape designations predate current national landscape policy and advice, that 2016 report has evaluated their designations with reference to current best practice, finds that although the evidence for why their boundaries were drawn as they are is no longer available, they nevertheless show continuity with the Landscape Character types and Landscape Character Areas defined in the 2008 study which shows a reasoned justification for their continuation. It finds that four areas are not justified by reference to current thinking and these are not included in the submitted VALP. It provides the additional work to identify key valued features and characteristics of each designated area which the 2015 advice felt was necessary to bring the 2008 study in line with current best practice.
363. I therefore conclude that the approach taken to landscape protection policy within VALP is sound in its general approach. It needs no modification other than those proposed by the Council to amend the supporting text and footnotes 7 and 9 to policy S3 [**MMs 13, 14, 233 and 234**]. These would;
- define the term coalescence more clearly
 - add a sentence to policy NE4 so as to require a LVIA for development likely to impact the AONB
 - amend policy NE5 to delete specific reference to the 2008 Landscape Character Assessment and
 - amend its penultimate sentence to recognise that mitigation of effects should be taken into account

They are necessary to provide clarity and justification to the policy. A factual correction to paragraph 6.40 relating to agricultural buildings is also necessary to make the plan sound [MM199].

Issue 15 – Whether the approach to planning for heritage assets would be sound

364. NPPF paragraph 126 advises that local planning authorities should set out in their local plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. As submitted, VALP appears to contain only one policy (BE1) relating to heritage assets. It is generic, rather than specific to any heritage asset and it is reactive, rather than proactive.
365. These specific concerns are assuaged by modifications **MM218** and **MM219**, which are necessary to demonstrate compliance with government policy. The former modification makes it clear that paragraphs 8.1 to 8.39 of the plan represent the plan's response to the NPPF requirement that local plans should contain a positive strategy for the conservation and enjoyment of the historic environment. The latter makes the point that the positive application of the strategy to particular heritage assets is contained within the allocation policy relevant to the particular heritage asset in question. This can be seen within allocations D-CDN001 and D-AYL059 amongst others. **MM220** to policy BE1 itself is also necessary to bring the policy into line with the NPPF.
366. My comments on allocations D-AGT2, D-HAD007 and D-HAL003 (RAF Halton) are also germane to this issue. They demonstrate how the Council's evidence base has taken into account heritage matters in preparing the proposals for individual allocations.

Issue 16 - The passage of time

367. This has been an examination extended over more than three years. During that time, events have occurred, including changes to legislation. Modifications to the Plan are needed as a result. Most of these have been previously referred to. The changes to the Use Classes Order require specific modifications [**MMs 174, 175, and 187A**].

Assessment of Other Aspects of Legal Compliance

368. My examination of the legal compliance of the Plan is summarised below.
369. The Local Plan has been prepared in accordance with the Council's Local Development Scheme.
370. Consultation on the Local Plan and the MMs was carried out in compliance with the Council's Statement of Community Involvement.
371. Sustainability Appraisal has been carried out and is adequate. Appraised options at the plan submission stage did not include dispersed settlement

options, to the disappointment of some who made representations. They were excluded from further consideration at an earlier stage of Sustainability Appraisal. The explanation is given in paragraph 6.3.7 of the final (2017) Sustainability Appraisal and also in response to my Q86. The explanation is twofold. Firstly, it was not known whether dispersed options could deliver the housing requirement (the HELAA did not find enough suitable sites). Secondly, *a priori* considerations of sustainability such as dispersed infrastructure provision and consequential increased travel movements meant that dispersed settlement options were not reasonable options to examine in detail. I concur with this explanation.

372. A number of representations allege that individual sites have been incorrectly evaluated in the Sustainability Appraisal. The implication is that, if their scoring were different then a different selection of sites would be included in the chosen development strategy. The scoring system used in the SA is a matter of judgement. Although I might come to a different judgement in a particular instance, as do some of the representations made, it does not follow that the judgement made in the SA is thereby unsound; it is simply different. I have not identified any circumstance in which I could clearly say that an unsound judgement has been made in the process which was clearly trying to constrain an excessive number of suitable sites to the housing numbers identified through the HEDNA.
373. Moreover, the representations misunderstand the purposes of the Sustainability Assessment; as noted earlier, in the discussion on allocation HAL003 RAF Halton, it is to inform the determination of a preferred strategy for VALP but it does not itself determine the preferred strategy. As the final sentence in Appendix III of the Sustainability Assessment makes clear, the intention is for the Council and stakeholders to take its findings into account when considering how best to 'trade-off' between competing objectives and establish the 'most sustainable' option. The way in which the Council has made that "trade-off" is clearly stated in paragraph 8.2.2 of the Sustainability Assessment. It does not depend on the score of any one site but on the characteristics of the options overall. A different ranking of the options in respect of any given criterion would not necessarily lead to a different choice being made. Paragraph 8.2.3 of the SA correctly points out that the chosen option also reflects the findings from other evidence documents; it does not just reflect the SA itself or feedback from public consultation.
374. Nevertheless, it should be clear from the sections of this report which deal with the spatial development strategy and the housing land allocations that an adjustment to the choice of spatial strategy needs to be made in order to identify additional allocations for housing development. A further option has needed to be considered. That further choice has been informed by an updated Sustainability Assessment which has also considered all the proposed modifications to the Plan, albeit scoping out some at an early stage of the Assessment.
375. The Habitats Regulations Appraisal Report (April 2017) is based on a main report evaluating an earlier version of the plan, supplemented by an Assessment report dated August 2017 which evaluates three main policy changes to conclude that the original Appraisal continues to hold true for the submission plan. However, paragraph 5.21 of the original Appraisal report

identifies two site allocations which may have significant effects on the Chiltern Beechwoods SAC through disturbance caused by increased public access to the Ashridge Estate.

376. Paragraphs 5.22 and 5.23 of the Appraisal Report conclude that the plan contains sufficient mitigation to avoid likely significant effect on the Chiltern Beechwoods SAC because policies NE1, NE2 and I1 “specifically outlines the amount of and distance to sufficient green space and thus has the potential to offset recreational impacts”. That conclusion is reiterated in paragraph 6.2 of the original Appraisal report. However, policy I1 in the submitted plan drops the prescription for the provision of natural green spaces which was in the earlier version of the plan. I am therefore unable to confirm that the plan as submitted would avoid significant effect on the Chiltern Beechwoods SAC and consequently, the plan as submitted must be found unsound in that respect. Modifications **MM260** and **MM279** are therefore necessary to reinstate requirements for the provision of accessible green space to mitigate likely significant effects on the Chiltern Beechwoods SAC.
377. Moreover, the recent judgement in the Court of Justice of the European Union (People over Wind, Peter Sweetman v Coillte Teoranta)(Case C-323/17) which is subsequent to the submission of the plan means that Appropriate Assessment cannot be avoided by the inclusion of mitigation measures within a project. Accordingly the Council commissioned a revised HRA Screening Assessment and an Appropriate Assessment, during the examination of the plan.
378. The consequent Habitats Regulations Appraisal Report prepared by LUC in June 2019 shows that whilst most likely significant effects on nearby SACs can be screened out, an AA is necessary in respect of the likely effects of recreational pressure and air pollution on parts of the Chiltern Beechwoods SAC. The report carries out those full assessments which show that in fact, no significant effect through air pollution would result but that the plan may have some negative effects through recreational impact which require mitigation but that this mitigation will have been secured through the plan as proposed to be modified.
379. As originally submitted, the local plan omitted to deal adequately with some strategic priorities such as the need to plan for the housing needs of some specialist groups but this omission has been remedied by modifications such as **MMs 153, 154, 155, 156, 157, 158, 159, 168, 169 and 170**. Consequently, I am satisfied that the Local Plan as proposed to be modified, taken as a whole, includes policies to address the strategic priorities for the development and use of land in the local planning authority's area.
380. The Local Plan, taken as a whole, includes policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change. Examples include policies T7 (electric vehicle infrastructure (as proposed to be modified by modification **MM217**)) C3 (renewable energy (as modified by modification **MM243**) and I4 (flooding (as proposed to be modified by modification **MM275**)) designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change.

381. In a few instances the Local Plan as submitted contains provisions for charging developers for carrying out work involved in the consideration of planning applications. These are ultra-vires and so cannot be justified. I recommend their deletion [**MMs 18, 114, 115, 116**].

382. As originally submitted, the Local Plan omitted to comply with Regulation 8 (4) & (5) of the 2012 Regulations (as amended) which require that the policies in a local plan must be consistent with the development plan - unless the plan being examined contains a policy that is intended to supersede another policy in the adopted development plan and the plan states that fact and identifies the superseded policy. Modification (**MM 282**) introducing Appendix F remedies that deficiency by including a Schedule of policies to be superseded. The Local Plan complies with all other relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations (as amended).

Overall Conclusion and Recommendation

383. The Plan has a number of deficiencies in respect of soundness and legal compliance for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explained in the main issues set out above.

384. The Council has requested that I recommend MMs to make the Plan sound and legally compliant and capable of adoption. I conclude that the duty to cooperate has been met and that with the recommended main modifications set out in the Appendix the Vale of Aylesbury Local Plan 2013-2033 satisfies the requirements referred to in Section 20(5)(a) of the 2004 Act and is sound.

P. W. Clark

Inspector

This report is accompanied by an Appendix containing the Main Modifications.

Appendix – Main Modifications

The modifications below are expressed either in the conventional form of ~~striketrough~~ for deletions and underlining for additions of text, or by specifying the modification in words in *italics*.

The page numbers and paragraph numbering below refer to the submission local plan, and do not take account of the deletion or addition of text.

Ref	Page	Policy/ Paragraph	Main Modification
MM1	14, 33, 34,	1.8, 3.13, S2	<i>Replace all references to 19,400 Aylesbury vale OAN figure with <u>20,600</u></i>
MM2	57, 58	3.79, table 7, 3.80	<i>Replace all references to 1,370 annual requirement figure with <u>1,430</u></i>
MM3	14, 33, 34, 36	1.12, 3.13. 3.17, S2, Table 1 (footnote 5)	<i>Replace all references to 27,400 total requirement figure with <u>28,600</u></i>
MM4	14	1.13	<i>Delete seventh sentence; This is to be considered as part of an early review.</i>
MM5	17	1.23	<i>Amend final sentence; The Masterplan <u>Individual SPDs</u> may set out further areas of open space and the Council <u>council</u> may require additional green infrastructure or open space areas in considering the impacts of planning applications.</i>
MM6	21	1.62	<i>Delete final sentence; This may include an early review of the Plan.</i>
MM7	27	2.6 objective 4	<i>Amend final sentence; The remainder of housing will then be located in the next most sustainable locations, the other strategic settlements, which are Buckingham, Haddenham, Winslow and Wendover, <u>the north east of Aylesbury Vale adjacent to Milton Keynes,</u> together with an appropriate level of development at the most sustainable settlements in the rural areas.</i>
MM8	33	3.15	<i>Amend final sentence; However, we fully anticipate the need to carry out an early review of VALP <u>This will be reconsidered in any future Local Plan update</u> to take into account newly emerging issues such as the Government's changed methodology on calculating housing need, as well as the impacts of major strategic schemes such as the Oxford to Cambridge Expressway <u>growth arc</u>, the London Plan and the expansion of Heathrow; and we expect a new settlement to form part of that Local Plan review.</i>
MM9	33	3.17	<i>Amend first sentence; In total, the development allocated in this plan, alongside</i>

Ref	Page	Policy/ Paragraph	Main Modification
			existing commitments and completions totals 28,830 <u>30,134</u> , which represents a 5.2 <u>5.4</u> % buffer on top of the requirement to meet the district's own objectively assessed need and the unmet need from the other authorities (27,400 <u>28,600</u>).
MM10	34	S2	<p><i>(a) Amend bullet points;</i></p> <ul style="list-style-type: none"> • A total of <u>at least</u> 27,400 <u>28,600</u> new homes in accordance with the spatial distribution set out below and in Table 1. This is made up of: • 19,400 homes to meet the needs of Aylesbury Vale District • 2,250 homes to meet the needs of Wycombe District • 5,750 homes to meet the needs of Chiltern/South Bucks Districts • Provision for the identified need of <u>at least</u> 27 hectares of employment land and additional provision of some employment land to contribute to the employment needs of the wider economic market area. • Retail convenience floor space of <u>at least</u> 7,337 sqm¹ and comparison floor space of <u>at least</u> 29,289 sqm² • Associated infrastructure to support the above <p><i>And amend second sentence of second paragraph;</i></p> <p>The strategy also allocates growth at a <u>two</u> sites adjacent to Milton Keynes which reflects its status as a strategic settlement immediately adjacent to Aylesbury Vale District</p> <p><i>and (c) amend clauses (a) to (j);</i></p> <p>a. Aylesbury Garden Town (comprising Aylesbury town and adjacent parts of surrounding parishes), will grow by 16,398 <u>16,207</u> new homes. It will be planned and developed drawing on Garden City principles which are set out in the Aylesbury Garden Town section, with high quality place-making and urban design principles at the core. This development will seek to support the revitalisation of the town centre. New housing will be delivered through existing commitments, including Berryfields and Kingsbrook, and complemented by other sustainable extensions and smaller scale development within the existing urban area. New homes to support economic growth will be accommodated through the effective use of previously developed land or sustainable greenfield urban fringe sites. These sites will provide or support delivery of identified strategic infrastructure requirements, and sustainable transport enhancements and make connections to strategic green infrastructure and the Vale's enterprise zones.</p> <p>b. Buckingham will accommodate growth of 2,359 <u>2,177</u> new homes. This, growth will enhance the town centre and its function as a market town, and will support sustainable</p>

¹ Made up of 6,980 sqm at Aylesbury town centre, 29 sqm at Wendover and 328 sqm at Winslow

² District-wide provision

Ref	Page	Policy/ Paragraph	Main Modification
			<p>economic growth in the north of the district <u>Aylesbury Vale</u>.</p> <p>c. Haddenham will accommodate growth of 1,051 <u>1,082</u> new homes. This will be supported by infrastructure and recognise the important role of Haddenham and Thame railway station.</p> <p>d. Winslow will accommodate growth of 1,166 <u>870</u> new homes, linked with the development of East-West Rail and the new railway station in Winslow</p> <p>e. Wendover will accommodate around 1,128 <u>1,142</u> new homes with 1,000 new homes at Halton Camp which is now confirmed to be closing <u>fully</u> in 2022<u>5</u> recognising the sustainability of Wendover and the railway station. No further growth is allocated at Wendover reflecting the environmental constraints of the surrounding AONB and Green Belt land.</p> <p>f. Land within <u>in the north east of</u> Aylesbury Vale adjacent to Milton Keynes will make provision for 2,212 <u>3,356</u> homes on a number of sites.</p> <p>g. At larger villages, listed in <u>Table 2</u> Policy S3, housing growth of 1,963 <u>2,408</u> will be at a scale in keeping with the local character This will help meet identified needs for investment in housing and improve the range and type of employment opportunities across the district <u>Aylesbury Vale</u>.</p> <p>h. At medium villages, listed in <u>Table 2</u> Policy S3, there will be housing growth of 1,095 <u>1,423</u> at a scale in keeping with the local character and setting. This growth will be encouraged to help meet local housing and employment needs and to support the provision of services to the wider area.</p> <p>i. At smaller villages, listed in <u>Table 2</u> Policy S3, there will be more limited housing growth coming forward through either 'windfall' applications or neighbourhood plan allocations rather than allocations in this Plan.</p> <p>j. Elsewhere in rural areas, housing development will be strictly limited. This is likely to be incremental infill development and should be principally in line with Policy D4 and other relevant policies in the Plan.</p>
MM11	36	Table 1	<i>Delete table 1 and substitute replacement table 1 appended at end of these modifications</i>
MM12	38	Table 2	<i>Delete table 2 and substitute replacement table 2 appended at end of these modifications</i>
MM13	42	3.22	<p><i>Amend;</i></p> <p><u>Part of the character of Aylesbury Vale is the distribution of settlements with individual identities. Settlement identity therefore needs to be protected to retain this important element in the area's character. The Council will therefore seek to preserve prevent the character and identities of neighbouring settlements or communities being degraded by development that would negatively affect their individual identities. To further protect the area's character the Council</u></p>

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			<u>council</u> will also resist development that would compromise the open character of the countryside between settlements, especially where the gaps between them are already small.
MM14	42	S3	<p><i>Amend;</i></p> <p>The scale and distribution of development should accord with the settlement hierarchy set out in Table 2, and the site allocation policies that arise from it <u>and the requirements of Policy S1</u>. Other than for specific proposals <u>which accord with policies in the plan to support thriving rural communities</u> and and the <u>development of allocations</u> in the Plan, new development in the countryside should be avoided, especially where it would:</p> <ul style="list-style-type: none"> a) compromise the character of the countryside between settlements, and b) result in a negative impact on the identities of neighbouring settlements or communities leading to their coalescence³. <p>In considering applications for building in the countryside the Council <u>council</u> will have regard to maintaining the individual identity of villages and avoiding extensions to built-up areas that might lead to <u>further</u> coalescence between settlements.</p>
MM15 Not used			
MM16	44	3.32	<p><i>Delete final two sentences;</i></p> <p>Whilst the arguments for releasing the RAF Halton site still remain, because of the change in circumstances and the future work to be done around how the site is developed after its closure, it is considered premature to define the boundary of the site to be released from the Green Belt. This boundary will be defined in a future Local Plan review</p>
MM17	46	3.41	<i>Delete paragraph</i>
MM18	48	S5	<p><i>Amend;</i></p> <p>All new development must provide appropriate on- and off-site infrastructure (in accordance with the Infrastructure Delivery Plan) in order to:</p> <ul style="list-style-type: none"> a) avoid placing additional burden on the existing community b) avoid or mitigate adverse social, economic and environmental impacts and c) make good the loss or damage of social, economic and environmental assets. <p>In planning for new development, appropriate regard will be given to existing deficiencies in services and infrastructure provision. Development proposals must demonstrate that these have been taken into account when determining the</p>

³ Coalescence is the merging or perceived merging or coming together of separate settlements to form a single entity

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			<p>infrastructure requirements for the new development. <u>Development proposals must secure sufficient bin storage.</u></p> <p>The provision of infrastructure should be linked directly to the phasing of development to ensure that infrastructure is provided in a timely and comprehensive manner to support new development.</p> <p>Where an applicant advises that a proposal is unviable in light of the infrastructure requirement(s), open book calculations <u>verified by an independent consultant approved by the council</u> will need to be provided by the applicant and then verified by an independent consultant verified by the Council at the expense of the applicant and be submitted to the Council for its consideration.</p> <p>A Community Infrastructure Levy or Local Infrastructure Tariff for Aylesbury Vale will be developed to secure funding for infrastructure. A supplementary planning document will be produced regarding the delivery and use of Section 106 planning obligation agreements.</p>
MM19	55	3.72	<p><i>Add;</i></p> <p><u>Importantly section 38(5) of the Planning and Compulsory Purchase Act 2004 requires that any conflict between policies in different plans must be resolved in favour of the policy in the last plan to become part of the development plan. Where there is conflict between the policies in this plan, whether strategic or otherwise, and the policies in made neighbourhood plans, that conflict will be resolved in favour of VALP unless VALP specifically provides otherwise. Note that policies in this plan which require "a minimum" (e.g of affordable housing) are not in conflict with neighbourhood plan policies requiring more than that minimum.</u></p>
MM20	55	S8	<p><i>Delete policy S8 and substitute new paragraph 3.75;</i></p> <p><u>To support neighbourhood plans and clarify their relationship with the Local Plan the local planning authority will expect the following principles to be applied in the development of neighbourhood plans. Neighbourhood plans should:</u></p> <p>a. <u>show how they are contributing towards the strategic policies of the Local Plan and be in general conformity with its strategic approach</u></p> <p>b. <u>clearly set out how they will promote sustainable development at the same level or above that which would be delivered through the Local Plan, and have regard to information on local need for new homes, jobs and facilities, for their plan area</u></p> <p>c. <u>Identify development opportunities in accordance with table 2 and, if desired, policy H2 of this plan</u></p>
MM21	57	3.76	<p><i>Amend;</i></p> <p>As required by the duty to co-operate, due consideration will be given (including through a review of the Plan where appropriate) to the housing needs of other local planning authorities in circumstances when it has been clearly</p>

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			established through the Local Plan process that those needs must be met through provision in Aylesbury Vale.
MM22	57	3.77	<p><i>Amend first sentence;</i> On the basis of current available evidence, i It is envisaged that the Plan will need to be <u>updated at some point in the future reviewed soon after adoption.</u></p> <p><i>Amend second sentence;</i> Regional, national and international connectivity schemes such as the Oxford-Cambridge Expressway <u>East West Rail</u> and Heathrow expansion will potentially have a significant impact on the district in the future, and therefore will inevitably influence future planning.</p>
MM23	57	3.78	<p><i>Amend;</i> The National Planning Policy Framework requires authorities <u>to demonstrate each year that they have a five year supply of 'deliverable' sites with an additional buffer (moved forward from later in the plan period).</u> A housing trajectory accompanying the Plan, <u>Appendix A</u>, shows how sites, <u>made up from all sources of new housing in the district – sites with unimplemented planning permissions, sites that have been approved subject to a s106 agreement, made neighbourhood plan allocations, sites notified to come forward under permitted development rights and allocations in the plan,</u> are envisaged to deliver housing, <u>including extra care units,</u> over the Plan period;. <u>This is based on discussions with developers, infrastructure providers and looking at previous delivery rates as well as other relevant factors. ‡ This illustrates that in accordance with the spatial strategy, much of the growth in Aylesbury Vale is through large strategic sites which have longer lead-in times and so do not deliver early in the plan period.</u> It shows that the Council will deliver the overall housing requirement and <u>could also maintain a five-year housing land supply of deliverable housing sites, spreading the undersupply of early years across the rest of the whole plan period (using the "Liverpool Method").</u> It will be kept up to date and monitored to ensure that the projected housing delivery is achieved. The trajectory sets out when delivery can reasonably be expected but does not prevent earlier or accelerated delivery.</p>
MM24	57	3.79 and table 7	<p><i>Amend paragraph 3.79;</i> Annualising the overall housing requirement results in a yearly need to build 1,370–1,430 <u>homes</u>. However there have already been four <u>seven</u> years of the Plan period with <u>the majority of</u> another one likely to have passed before the Plan is adopted. The delivery <u>of housing in these years up until 2018,</u> whilst significantly higher than delivery rates previously rates, <u>has cumulatively fallen fell</u> short of this target <u>the annual need</u>. However, the two most recent years <u>of housing delivery greatly exceeded the requirement and the overall shortfall has decreased:</u></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><i>Amend table 7 annual requirement;</i> 1370 <u>1430</u> <i>Amend table 7 second row, 2014/5 column;</i> 1,419 <u>1,355</u> <i>Amend table 7 second row, 2016/7 column;</i> 1,323 <u>1,309</u> <i>Amend table 7 second row, 2017/8 column;</i> 1,289 (projected) <u>1,395</u> <i>Amend table 7, third row;</i> -380, -440, -331, -515, -510, -754, -557, -875, -638, -910 <i>Add 2018/9 column to table 7;</i> <u>1,430, 1,758, -582</u> <i>Add 2018/9 column to table 7;</i> <u>1,430, 1715, -297</u></p>
MM25	58	3.80	<i>Amend first sentence to substitute <u>1430</u> for 1370.</i>
MM25A	59	Table 8	<i>Delete table 8 and substitute amended table 8 (appended at end of these modifications)</i>
MM25B	59	3.84	<p><i>Amend;</i> 2007 <u>2010</u>, 2017 <u>2020</u>, 74 <u>76</u>, are, 962, <u>760</u>, 13 <u>10</u>, 2020 <u>2023</u></p>
MM26	59	S9	<p><i>Amend clause (a);</i> Site allocations, <u>committed sites</u>, and <u>windfall sites</u> are not coming forward at the rate anticipated in the housing trajectory, leading to development not being delivered at the rate expected in the Plan <i>And amend final sentence;</i> Irrespective of the above criteria, the Plan will be reviewed <u>have undergone a review</u> within five years <u>of the adoption of this plan</u>.</p>
MM26A	61	4.4	<p><i>Amend;</i> Alongside the policy within VALP a series of accompanying planning documents (SPDs) are being developed to support delivery of the Garden Town. These SPDs will focus on <u>include</u>:</p> <ul style="list-style-type: none"> <u>An AGT Framework and Infrastructure SPD will provide further guidance on the coordination of growth across AGT and linkages and improvements to the existing built environment and in particular the town centre. It will include an action plan and a strategic infrastructure delivery of the Garden Town – this schedule which will set out all the key strategic physical, green and social infrastructure required to deliver a the Garden Town setting out how it is funded, when it will be delivered and how</u> <u>The Aylesbury Vale Design SPD will include strategic</u>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>Garden Town design guidance for the Garden Town – this will further define the character of the Garden Town and provide design guidance for key components such as transport and movement routes, parks and green space and built development, and focus on delivery and implementation of this</p> <ul style="list-style-type: none"> A site-specific Masterplan SPDs, as required, for the garden communities to set out a clear and detailed framework for place-making and delivery of each site for D-AGT1 to ensure comprehensive development is delivered in accordance with the site requirements and Garden Town principles.
MM27	62	4.7	<p><i>Amend;</i></p> <p>Taking forward past completions since 2013 (2,864 <u>5,604</u> dwellings) and projected supply from existing allocated sites and other deliverable sites (5,727 <u>7,321</u> dwellings), this leaves 7,810 <u>3,282</u> dwellings to be allocated at Aylesbury in the VALP.</p>
MM27A	62	4.8	<p><i>Insert before final sentence;</i></p> <p><u>Guidance on how to achieve successful garden communities will be set out in the Aylesbury Vale Design SPD.</u></p>
MM28	65	4.18	<p><i>Amend penultimate sentence;</i></p> <p>Policies D2 and S4 support <u>Policy S5 supports the VALP's infrastructure delivery, alongside the AGT Framework and Infrastructure SPD.</u></p>
MM29	66	4.21	<p><i>Amend;</i></p> <p>The green infrastructure proposal map for this, shown below, sets out the proposal area and some detail about the project. More information can be found in the green infrastructure proposals schedule in the delivery plan. Policy I1 supports the delivery of <u>multi-functional</u> green infrastructure. <u>In 2016 the Buckinghamshire and Milton Keynes Natural Environment Partnership, which includes AVDC and BCC, produced a 'Vision and Principles for the Improvement of Green Infrastructure in Buckinghamshire and Milton Keynes' setting out a number of principles to support the delivery of high quality green infrastructure. The document serves as a supplementary update to the 2009 GI Strategy and should be implemented as part of policy I1.</u></p>
MM30	66	4.21 map title	<p><i>Amend;</i></p> <p>Aylesbury Linear Park Green Infrastructure Proposals Map</p>
MM30A	67	4.24	<p><i>Amend;</i></p> <p>16,398 <u>16,207</u></p>
MM31	69	D1	<p><i>Amend second paragraph;</i></p> <p>Aylesbury will deliver <u>at least 16,586</u> <u>16,207</u> new homes. Taking account of commitments and completions, 7,810 <u>3,282</u> homes are allocated at Aylesbury in the Plan. The Policies Map allocates the following major sites for</p>

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			<p>development:</p> <p><i>In third paragraph, delete;</i></p> <p>Oaklands Hostel Aylesbury (D-AYL077)</p> <p><i>Amend fifth paragraph;</i></p> <p><u>To comply with policy T1 Delivering The Sustainable Transport Vision, all development in Aylesbury Garden Town should make a significant contribution to meeting the Aylesbury Transport Strategy.</u></p> <p><i>Amend seventh paragraph clauses (a), (b), (d), (e), (f), (g), (h) and (j);</i></p> <p>a. To create distinctive, <u>inclusive</u>, sustainable, high quality, successful new communities <u>which support and enhance existing communities within the town and neighbouring villages</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</u> local assets and <u>establishing establishes</u> environments that promote health, happiness and well-being. <u>The Aylesbury Garden Town design principles and detailed design guidance will be set out within the overarching Aylesbury Garden Town-Vale Design Guidance SPD and individual site-specific supplementary planning documents (SPDs).</u></p> <p>b. Ensuring the right infrastructure is provided at the right time, ahead of or in tandem with the development that it supports, to address the impacts of new garden communities and to meet the needs of residents <u>and the town's changing demographics</u> (in accordance with Policy S5 and the Infrastructure Delivery Plan). The Aylesbury Garden Town Strategic Framework and Infrastructure Delivery SPD will set out in detail when infrastructure is required and how it will be delivered and funded</p> <p>d. Development will be delivered to provide a truly balanced, and <u>inclusive and accessible</u> community and that <u>meets</u> the needs of local people, including the mix of dwellings sizes, tenures and types including provision for custom and self build and for an ageing population (in line with policies H5 , H6 and H7 <u>H6a, b and c</u>); the Garden Town will also deliver housing for those most in need through delivery of a minimum of 25% affordable housing (in line with policy H1)</p> <p>e. Providing and promoting opportunities for <u>local</u> employment for new and existing residents, both within and alongside new garden communities, to support and enhance the overall economic viability of Aylesbury Garden Town (inline with policies E1, E2, E3, and <u>E4 and E5</u>)</p> <p>f. Promote and encourage sustainable travel choices through <u>the requirement of travel integrated, forward looking and accessible transport options which support economic prosperity and wellbeing for residents. Travel plans will be required</u> to increase walking, cycling and the promotion of</p>

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			<p>public transport routes connecting new garden communities to the town and beyond. New development should be planned around a user hierarchy that places pedestrians and cyclists at the top. Consideration should also be given to delivering electric vehicle infrastructure in new development and disability discrimination requirements. Policies T1, T2, T3, T4, T5, T6, T7 and T8 should be taken into account</p> <p>g. New garden communities should be designed to be easily accessible and <u>maximize opportunities to integrate with existing communities to create healthy, sociable, vibrant and walkable neighbourhoods with equality of access for all to a range of community service and facilities including health/wellbeing, education, retail, culture, community meeting spaces, multifunctional open space, sports and leisure facilities and well connected to public transport. Policies I2 and I3 should be taken into account. Site-specific The Aylesbury Garden Town Framework and Infrastructure supplementary planning documents (SPDs) will be developed as required to set out clear and detailed requirements <u>advice</u> for place-making</u></p> <p>h. Creation of distinctive environments which seek to achieve a minimum of 50% land within the proposed garden communities as local and strategic <u>multi-functional</u> green infrastructure which should be designed as multifunctional, accessible, and maximise benefits such as for wildlife, recreation and water management. This will include land required to mitigate the ecological and flood risk impacts of development. <u>As part of the masterplan for allocated sites, areas of Best and Most Versatile Agricultural Land will be preferred to be used for green infrastructure.</u> Management regimes should be developed in tandem with the detailed development of GI for each of the garden communities. Policies I1, I2, I3, <u>I4, I5, I6</u>, NE1, NE2, NE3, <u>and NE4 and NE5</u> should be taken into account. A Site-specific SPDs <u>Masterplan SPD</u> will be developed as required for AGT1 Aylesbury South in order to set out clear and detailed requirements <u>advice</u> for place-making</p> <p>j. To preserve or enhance heritage assets including through mitigation as required. New garden communities should be designed to be resilient places that allow for changing demographics, future growth and the impacts of climate change by anticipating opportunities for technological change including renewable energy measures and 5G.</p>
MM32	72	4.33	<p><i>Amend;</i></p> <p>Given the large number of smaller <u>parcels sites</u> that make up this allocation, an overall <u>AGT1 Masterplan</u> SPD 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 will be achieved from the B4443 Lower Road and A413 Wendover Road.</u></p>

Ref	Page	Policy/ Paragraph	Main Modification
MM33	72	4.35	<p><i>Amend;</i></p> <p>Parts of the overall site have individual planning applications which are at varying stages. The current planning status of the site is as follows:</p> <ul style="list-style-type: none"> • The western parcel of SMD004 has an as-yet undetermined application detailed permission for 125 dwellings and is under construction (18/00913/ADP 16/04608/AOP). SMD018 has outline planning permission for 117 dwellings. • There is an as yet undetermined application for 750 dwellings which covers the remainder of SMD004 as well as SMD006 (19/01628/AOP). <p><u>39 of the 125 permitted dwellings have now been completed and the remaining 86 are expected to be delivered by 2022. The remainder of the "South Aylesbury" site is to come forward 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 expected time of delivery.</u></p>
MM34	72	4.37	<p><i>Amend first sentence;</i></p> <p>A Master Plan <u>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><i>Delete the remainder of the paragraph</i></p>
MM35	74	D-AGT1	<p><i>Add new row below size (hectares);</i></p> <p><u>Completions and expected time of delivery</u></p> <p><u>39 homes delivered up to 2020, 161 homes to be delivered 2020-2025 and 800 homes to be delivered 2025-2033</u></p> <p><i>In allocated for row, delete fourth bullet point.</i></p> <p><i>Amend site-specific requirements a, c, d, g, h, i, m, o, p, and q (re-referenced as r) re-reference r as t and add new requirements q, s and u;</i></p> <p>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></p> <p>c. Provision <u>Safeguarding the land required for the delivery of a dual carriageway distributor road (the SEALR) between B4443 Lower Road and A413 Wendover Road to cross the railway line with sufficient land for associated works including but not limited to earthworks, drainage and structures.</u></p> <p>d. Provision of new access points into the sites <u>development parcels from the B4443 (Lower Road) and A413 (Wendover Road). Access from the South East Aylesbury Link Road (SEALR) will not be supported unless it can be demonstrated that this would leave parcels of land inaccessible and</u></p>

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			<p><u>incapable of development.</u></p> <p>g. Proposals must retain and enhance existing habitats where practicable, including the creation of linkages with surrounding wildlife assets <u>and green corridors linking development with the wider countryside and surrounding communities</u></p> <p>h. Provision and management of 50% green infrastructure to link to other new development areas and the wider countryside <u>as part of a high quality built and semi-natural environment</u></p> <p>i. The development should be designed using a landscape-led approach including consideration of the long-distance views of the AONB <u>and the field pattern and landscape features on the site</u></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', with built-Built development should be</u> restricted to Flood Zone 1</p> <p>o. Provision of a buffer between the new development and Stoke Mandeville <u>to maintain the setting and individual identity of the existing settlement of Stoke Mandeville</u></p> <p>p. Provision of land, buildings and car parking for a combined primary school, including playing field provision, <u>and a contribution to secondary school provision</u></p> <p>q. Provision of land, buildings and car parking for a new local centre, including community hall <u>retail</u></p> <p>r. Provision of <u>financial contributions towards off-site on-site</u> health facilities <u>and community buildings (including temporary buildings if necessary)</u></p> <p>s. <u>Provision of community buildings, including temporary buildings if necessary</u></p> <p><u>u. Retention of the Grade II listed Magpie Cottage within an appropriate setting</u></p> <p><i>Amend Implementation approach;</i> Development of the South Aylesbury Strategic Site Allocation will come forward towards the latter end of the Plan period, and only once a <u>AGT1</u> Masterplan SPD for the allocation has been prepared and adopted by the Council. Proposals for development within the South Aylesbury Strategic Site Allocation will be expected to demonstrate how they positively contribute to the achievement of the SPD and the Aylesbury Garden Town Principles as set out in Policies <u>D1 and D2</u>. Any development on this site should be in accordance with the overarching policies and principles for the development of Aylesbury Garden Town</p>
MM36	76	4.40	<p><i>Amend;</i></p> <p>The allocation comprises the following sites:</p> <ul style="list-style-type: none"> • Land between Oxford Road, Standalls Farm and Aylesbury

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			<p>(STO016 and SMD009) – up to 1,382 <u>1,400</u> dwellings (<u>1,300 up to 2033 and then 100 after the plan period</u>)</p> <ul style="list-style-type: none"> Land at Lower Road Aylesbury (SMD012) – already committed <u>permitted</u> for 190 dwellings Land between Marsh Lane, Princes Risborough Railway Line and Aylesbury – up to 168 dwellings.
MM37	76	4.42	<p><i>Amend first sentence;</i></p> <p>The majority of the allocation is planned to come forward later in the Plan period between 2024 and 2033 and the delivery will be affected by the site's especially due to the relationship to and dependence on the delivery of HS2.</p>
MM38	76	4.43	<p><i>Add full stop at end of first sentence. Correct reference to A4010 in sixth sentence. Delete seventh sentence.</i></p>
MM38A	76	4.45	<p><i>Amend;</i></p> <p>At the site known as Lower Road (SMD012), all 190 <u>129</u> dwellings have now been completed and the remaining 61 dwellings will be <u>are expected to be delivered in years one to five of the Plan period by 2022.</u> The remainder of the 'South west Aylesbury' site will commence delivery within the end of the first ten years of the Plan, with the majority delivered in 10-15 years <u>is projected to deliver between 2024 and 2033.</u></p>
MM39	77	4.47	<p><i>Delete paragraph</i></p>
MM40	77	4.48 and 4.49	<p><i>Delete paragraphs</i></p>
MM41	78	D-AGT2	<p><i>Add new row below size (hectares);</i></p> <p><u>Completions and expected time of delivery</u></p> <p><u>129 homes built up to 2020, 121 homes to be delivered 2020-2025 and 1,240 homes to be delivered 2025-2033</u></p> <p><i>Amend last line of Size row;</i></p> <p>11.6ha <u>9.36ha</u></p> <p><i>Amend first bullet of Allocated for row;</i></p> <p>Around <u>At least 1,550</u> <u>1,490</u> dwellings up to 2033</p> <p><i>Amend first line of site specific requirements and clause a, re-reference clauses b, c, d, h, i, k, m, n, o and s, as c, d, e, i, j, l, n, o, p and u, insert new requirements b and t and amend clauses e, f, g, j, l, p, q and r as clauses f, g, h, k, m, q, r, s, and v;</i></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</p> <p>a. <u>Create a new garden community providing</u> Provision for land for around <u>at least 1,550</u> <u>1,490</u> dwellings at a density that takes account of the adjacent settlement character and identity. The development should be integrated with the</p>

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			<p><u>existing built area of Aylesbury and respond positively to the best characteristics of the surrounding area to deliver a high quality built and seminatural environment</u></p> <p>b. <u>The scheme will also enable the delivery of the South West Link Road, relieving traffic pressures in the town centre and enabling easier vehicular movement around Aylesbury</u></p> <p>e. Provision of land, building and car parking for one primary school with a pre-school, funding to support for a children's centre, upper secondary <u>secondary</u> school provision, grammar school provision, and expansion of existing special schools</p> <p>g. Proposals must retain and enhance existing habitats where practicable, including the creation of linkages, <u>including green corridors</u>, with surrounding wildlife assets <u>and surrounding communities</u>. <u>The site will have access to a range of open spaces, including the new linear park alongside HS2, and have been carefully designed to respect the identity and character of the existing urban area</u></p> <p>h. The development should be designed using a landscape-led approach including consideration of the long-distance views of the AONB <u>respond positively to the best characteristics of the surrounding area and reflecting the field pattern and mature landscape features on the site</u></p> <p>k. The development should be designed using a sequential approach. Flood Zones 2 and 3 and 3a plus climate change (subject to 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 <u>Built</u> development <u>should be</u> restricted to Flood Zone 1</p> <p>m. Flood alleviation through measures identified in the SFRA Level 2 for investigation, including through flood alleviation systems benefitting the wider community and provision of sustainable drainage systems (SUDS), will be required to reduce pressure on the existing drainage network. <u>The site will also provide flood alleviation to Stoke Brook through diversion of the brook and appropriate complementary measures, such as attenuation lakes.</u></p> <p>q. New major transport infrastructure such as Stoke Mandeville A4010 realignment, <u>the A413-A418 Link Road and HS2</u> should be designed so that the potential loss of floodplain and change of flow pathways resulting from their implementation do not have an adverse effect on flood risk. They should also be designed to ensure that they remain operational and safe for users in times of flood</p> <p>r. Provision and management of 50% green infrastructure to link to other new development areas and the wider countryside, <u>Integration of new development with existing built up area of Aylesbury and existing countryside through internal and external walking and cycling links and through 50% AnGST compliant GI and deliver open spaces that respect the character and identity of the existing urban area</u></p> <p>s. Provision of on-site <u>financial contributions towards off-site</u> health facilities and community buildings (including</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>temporary community buildings if necessary)</p> <p>t. <u>Provision of community buildings, including temporary buildings if necessary</u></p> <p>v. <u>Retention of a suitable setting for Grade II listed Hall End farm house and Stoke Cottage</u></p> <p><i>Amend implementation approach;</i></p> <p>Development of the South west Aylesbury Strategic Site Allocation will come forward towards the latter end of the Plan period, and only once a Masterplan and Delivery SPD for the allocation has been prepared and adopted by the Council.</p>
MM42	80	4.51	<p><i>Amend;</i></p> <p>The allocation comprises the following sites:</p> <ul style="list-style-type: none"> • Woodlands, <u>College Road North (WTV018)</u> – allocated for <u>has a resolution to grant permission subject to a Section 106 agreement for 1,100 dwellings (990 allocated up to 2033 and 110 expected to deliver after the plan period)</u> and 102,800 sqm of employment land alongside infrastructure. This site will form a key development area of employment and custom build housing to support the growth of the Garden Town • Manor Farm, <u>Broughton (BIE022)</u> – allocated for 350 dwellings • Westonmead Farm, <u>A41 London Road (WTV017)</u> – allocated for 60-157 dwellings • College Farm <u>(AST037)</u>– allocated for 250 dwellings
MM43	81	4.59	<p><i>Amend;</i></p> <p><u>The current planning status of the site is as follows:</u></p> <ul style="list-style-type: none"> • <u>The area of the site known as Woodlands (WTV018) has a current planning application, 16/01040/AOP, which has a resolution to grant permission subject to a Section 106 agreement as yet undetermined.</u> It proposes up to 102,800 sqm of employment land, a strategic link road connecting with the ELR (N) and the A41 Aston Clinton Road, transport infrastructure, landscape, open space, flood mitigation and drainage, and up to 1,100 dwellings (including custom and self build units), and a 60-bed care home/extra care facility. • <u>Westonmead Farm (WTV017) has an as yet undetermined application in for 157 dwellings (17/04819/AOP).</u>
MM44	81	4.60	<p><i>Amend;</i></p> <p>Development of <u>the first 990 homes of Woodlands</u> this site will commence within the first five years of the Plan period, is projected to deliver between 2024 and 2033, with the final 100 delivering by 2034. and <u>The 157 homes at Westonmead Farm are expected to be delivered between 2023 and 2026 and then will complete by the end of the Plan period</u> the remainder of the "Aylesbury north of A41" site is expected between 2026 and 2033.</p>

Ref	Page	Policy/ Paragraph	Main Modification
MM45	81	4.61	Delete paragraph
MM46	81	4.63	Delete paragraph
MM47	82	4.65	Delete paragraph
MM48	83	D-AGT3	<p>Add new row below size (hectares);</p> <p><u>Completions and expected time of delivery</u></p> <p><u>150 homes to be delivered 2020-2025 and 1,597 homes to be delivered 2025-2033</u></p> <p><i>Amend first bullet of Allocated for row;</i></p> <p>Around 102,800 sqm of employment land (B1 <u>appropriate class E</u> (25,600sqm), B2 (44,400 sqm) and B8 (32,800 sqm))</p> <p><i>Amend second bullet of Allocated for row;</i></p> <p>Around 1,660 <u>At least 1,747 dwellings up to 2033</u> (including custom and self build units)</p> <p><i>Amend fourth bullet of Allocated for row;</i></p> <p>Mixed use local centre of around 4,000 sqm (Use classes A1, A2, A5 and D1 <u>appropriate E, F.1, F.2 & Sui Generis</u>)</p> <p><i>Amend eleventh bullet of Allocated for row;</i></p> <p>Around 2ha for a two-form entry primary school (D1 <u>E.1</u>)</p> <p><i>Amend first sentence of Site-specific requirements and clauses a, b, f, g, h, k, o, r, t, insert new clauses m, v, x and y and re-reference subsequent clauses, delete clause q;</i></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.</p> <p>a. Provision for land for around at least 1,660 <u>at least 1,747</u> dwellings (up to 2033) at a density that takes account of the adjacent settlement character and identity. The development <u>and the resulting new urban edge</u> should be integrated with the existing built <u>built</u> area of Aylesbury, and maintain the settings and individual identity of Aston Clinton, Broughton and the existing urban edge <u>as well as responding positively to the best characteristics of the surrounding area including the Aylesbury Arm of the Grand Union Canal</u></p> <p>b. Provision of a distributor road between the ELR (N) and the A41 Aston Clinton Road and any related highway improvements <u>to be delivered within five years of the development commencing.</u></p> <p>c. Provision of land, building and car parking for one primary school with a pre-school, funding to support a children's centre, upper secondary school provision, grammar school provision, and expansion of existing special schools</p> <p>f: The development should be designed using a landscaped approach including consideration of the long distance views of the AONB <u>and respond positively to the best</u></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><u>characteristics of the surrounding area</u></p> <p>g. Provision for <u>cycleways, footpaths and public transport connections</u> into the town and to surrounding areas. Active travel links to be established to Broughton Lane, the Garden <u>Town</u> Community and the Aylesbury Arm of the Grand Union Canal</p> <p>h. Town-wide <u>Flood defences through a flood alleviation system benefitting the wider community and provision of sustainable drainage systems (SuDS) will be required to reduce pressure on the existing drainage network</u></p> <p>k. The development should be designed using a sequential approach. Flood Zones 2 and 3 and 3a plus climate change (subject to detailed flood risk assessment) <u>shown as areas of not built development on the policies map</u> should be preserved as green space <u>laid out for uses compatible with these Flood Zones</u> with built development restricted to Flood Zone 1</p> <p>m. Land at Manor Farm (BIE022) shall not be developed <u>until the Eastern Link Road (South) through the adjacent site WTV018 (Woodlands) has been delivered and opened to traffic. A planning application on site BIE022 must demonstrate that Flood Risk Exception Test Part 2 (See VALP Flood Risk Sequential Test 2017) has been met by a developer. The Exception Test Part 2 will be supported by a site specific Flood Risk Assessment (FRA) to support a planning application and shall demonstrate that access and egress from and to the development, via the ELR and on-site access routes, will be safe and operational in times of flooding. The main vehicular access to the site shall be from the ELR (S) and not from Broughton Lane. The FRA must meet all the recommendations for the site in the Aylesbury Vale SFRA Level 2 (2017) and VALP Policy I4.</u></p> <p>p. Provision and management of 50% of green infrastructure to link to other new development areas and the wider countryside. <u>Integration of new development with existing built up area of Aylesbury and existing countryside through internal and external walking and cycling links and through 50% AnGST compliant GI .The site will also deliver a 16ha sports village and pitches</u></p> <p>s. Landscape buffers to existing development on the northern part of the site At Westonmead Farm to integrate into open space proposals included with the Woodlands development proposals, <u>development is to be kept to the southern section of the area. The northern section of the area identified as 'not built development' is to be retained for green infrastructure (criteria p above) the Aylesbury Linear Park. There are some existing agricultural buildings to the north of the watercourse, their conversion to a suitable use that is compatible with their rural nature and Green Infrastructure context would be considered acceptable.</u></p> <p>v. <u>Provision of community buildings, including temporary buildings if necessary</u></p>

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			<p><u>x. Any proposal will need to ensure a condition is applied requiring the submission of a detailed Design Code (covering built form, highways and, landscaping) ahead of any Reserved Matters applications.</u></p> <p><u>y. This site allocation contains 5 grade 2 listed canal structures along the Grand Union Canal to the north of the site. Along with the consideration of these structures, the setting of the list Listed Buildings adjacent to Woodlands located at Threshers Bern, Turners Meadow at Aston Clinton and Burnham's Field at Weston Turville will also need to be considered in relation to any proposals.</u></p> <p><i>Amend Implementation approach row;</i></p> <p>Development of the Aylesbury north of the A41 strategic site allocation will come forward towards the latter end of the Plan period, in accordance with the Masterplan and Delivery SPD for the allocation that has been prepared and adopted by the Council.</p> <p>Proposals for development within this strategic site allocation will be expected to demonstrate how they positively contribute to the achievement of the SPD and the Aylesbury Garden Town Principles as set out in Policy D1.</p> <p><i>Insert concept plan for Woodlands</i></p>
MM49	86	4.67	<p><i>Amend;</i></p> <p>The allocation comprises the following sites:</p> <ul style="list-style-type: none"> • the first is the major development area known as Hampden Fields which allocates 3,000 homes and 46,800 sqm of employment. This site will form a vital urban extension to Aylesbury, integral to the town's Garden Town status • the second site known as 'Land adjacent to Aston Clinton Holiday Inn' will deliver 60 homes • the third known as 'Land at New Road Weston Turville' will deliver a further 51 homes. <u>• Land at Hampden Fields (WTV022) – has a resolution to grant permission subject to a section 106 agreement for 3,000 dwellings (2,555 allocated up to 2033 and 445 expected to deliver after the plan period) and 46,800 sqm of employment. This site will form a vital urban extension to Aylesbury, integral to the town's Garden Town status</u> <u>• Land adjacent to Aston Clinton Holiday Inn' (WTV019) – allocated for 108 dwellings</u> <u>• Land at New Road, Weston Turville (WTV021) – allocated for 51 dwellings</u> <u>• Land east of New Road, Weston Turville (WTV020) – already permitted for 64 dwellings</u> <u>• Land bounded By New Road And Aston Clinton Road (WTV025) – already permitted for 135 dwellings</u>
MM50	86	4.73	<p><i>Delete paragraph and substitute;</i></p> <p><u>The current planning status of the site is as follows:</u></p> <ul style="list-style-type: none"> <u>• Land at Hampden Fields has a resolution to grant</u>

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			<p>permission subject to a Section 106 agreement reference (16/00424/AOP)</p> <ul style="list-style-type: none"> • Land adjacent to Aston Clinton Holiday Inn (WTV019) , has an as yet undetermined application for 108 dwellings (16/03388/AOP) • Land east of New Road, Weston Turville (WTV020) has detailed permission and is under construction (17/00533/ADP) • Land Bounded By New Road And Aston Clinton Road (WTV025) has detailed permission and is under construction (16/01254/ADP)
MM51	86	4.74	<p><i>Delete paragraph and substitute;</i></p> <p><u>Land Bounded By New Road And Aston Clinton Road and Land east of New Road were both completed at the end of 2019. Land at Hampden Fields is projected to come forward between 2023 and 2033 and the remainder of the "Aylesbury south of A41" site is expected to deliver between 2022 and 2027.</u></p>
MM52	87	4.75	<p><i>Amend;</i></p> <p>Careful consideration needs to be given to phasing and co-ordination of the delivery of the whole site through the Masterplan and Delivery SPD.</p>
MM53	87	4.77	<i>Delete paragraph</i>
MM54	87	4.79	<i>Delete paragraph</i>
MM55	88	D-AGT4	<p><i>Add new row below size (hectares);</i></p> <p><u>Completions and expected time of delivery</u></p> <p><u>199 homes built up to 2020, 338 homes to be delivered 2020-2025 and 2,376 homes to be delivered 2025-2033</u></p> <p><i>Amend first bullet of Allocated for (key development and land use requirements) row;</i></p> <p>Around 3,111 <u>At least 2,913</u> dwellings</p> <p><i>Amend Site-specific requirements first sentence and clauses a, c, e, f, m, p, re-reference q as r and insert new clauses q and s;</i></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.</p> <p>a. Provision of land for around <u>at least 2,913</u> dwellings at a density that takes account of the adjacent settlement character and identity. The development should be integrated with the existing build area of Aylesbury, and maintain the settings, and individual identity <u>and character</u> of Stoke Mandeville and Weston Turvill</p> <p>b. Provision of land, building and car parking for two primary schools each with a pre-school, a children's centre on one of</p>

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			<p>the primary school sites and funding to support upper <u>secondary</u> school provision, grammar school provision, and expansion of existing special schools</p> <p>c. Existing vegetation <u>and landscape features</u> should be retained where practicable, including <u>field patterns</u>, existing woodlands and hedgerows. Existing public rights of way need to be retained and integrated into the development within safe and secure environments as part of a wider network of sustainable routes, to directly and appropriately link the site with surrounding communities and facilities <u>utilising green corridors</u></p> <p>e. The development should be designed using a landscaped approach including consideration of the long-distance views of the AONB <u>and respond positively to the best characteristics of the surrounding area</u></p> <p>f. Provision for <u>cycleways, footpaths and public transport connections</u> into the town and to surrounding areas</p> <p>m. The development should be designed using a sequential approach. Flood Zones 2 and 3 and 3a plus climate change (subject to detailed flood risk assessment), <u>as shown on the policies map as "areas of not built development"</u>, should be preserved as green space with built development restricted to Flood Zone 1</p> <p>n. New major transport infrastructure such as Eastern <u>the Southern</u> Link Road should be designed so that the potential loss of floodplain and change of flow pathways resulting from their implementation do not have an adverse effect on flood risk. They should also be designed to ensure that they remain operational and safe for users in times of flood</p> <p>p. Provision of <u>an on-site health facilities and community buildings (including temporary buildings if necessary). Where it is justified provision for expansion or an alternative larger site may need to be identified and secured for a multipurpose health facility to accommodate further growth and service demand to increase capacity.</u></p> <p>q. <u>Provision of community buildings, including temporary community buildings if necessary</u></p> <p>s. <u>Provision of employment land which is attractive to occupiers who seek an accessible, high quality location.</u></p> <p><i>Insert concept plan for Hampden Fields</i></p>
MM55A	90	4.81	<p><i>Amend:</i></p> <p>The Berryfields Major Development Area (MDA) is situated to the north-west of Aylesbury. The development includes 3,254 <u>3,372</u> new dwellings, employment, a district centre, schools, transport infrastructure and open space and community facilities. The site is situated off the A41 to the north-west of Aylesbury <u>and includes the following permissions:</u></p> <ul style="list-style-type: none"> • <u>'Berryfields MDA' (03/02386/AOP) - permitted for</u>

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			<p><u>3,000 dwellings and under construction</u></p> <ul style="list-style-type: none"> • <u>'Berryfield House' (07/03447/AOP) - permitted for 235 dwellings and was completed in 2016</u> • <u>'Berryfields MDA' (17/02999/APP) - permitted for 112 dwellings and is under construction</u> • <u>'Berryfield Cottage' (10/01848/APP) - permitted for 19 dwellings and under construction</u> • <u>'Berryfields MDA' (17/03863/APP) - permitted for 13 dwellings. Seven of these fall under the original permission for 3,000 dwellings.</u>
MM55B	90	4.83	<p><i>Amend;</i></p> <p>Over half 85% of the housing on the site has been completed and reserved matters have been granted for the remainder of the housing at Berryfields. There are approximately 1,180 dwellings still to come forward. While some <u>Some</u> of the other planned requirements, including education, community and transport, are in place there has been limited and progress is underway on providing to provide the local centre and employment areas.</p>
MM55C	90	4.85	<p><i>Amend first sentence;</i></p> <p>2,335 <u>2,885</u> dwellings and the western link road have already been developed, with 919 <u>487</u> dwellings still to be built.</p> <p><i>Add new final sentence;</i></p> <p><u>The site is projected to be completed by 2025.</u></p>
MM56	90	4.87	<i>Delete paragraph</i>
MM57	92	D-AGT5	<p><i>Add new row below size (hectares);</i></p> <p><u>Completions and expected time of delivery</u></p> <p><u>2,885 homes built up to 2020, 487 homes to be delivered 2020-2025 and no homes to be delivered 2025-2033</u></p> <p><i>Amend Site-specific requirements, first sentence and clauses a and c and add clause f;</i></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.</p> <p>a. employment allocation of 9ha split on two sites with a range of employment uses and space for start-up units in high quality buildings. The proposed development will add variety to the portfolio of employment in Aylesbury <u>and retain existing provision</u></p> <p>c. the district centre is located at the intersection of the principal road, pedestrian and cycle networks, and consideration should be given to design to ensure public transport and sustainable travel choices are maximised <u>whilst recognising proximity to the new railway station</u></p> <p>f. <u>achieve a form of development comprising distinctive</u></p>

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			<p><u>linked / coalesced 'urban villages' with a diversity of layout and design which reflects the range of 'local distinctiveness'.</u></p> <p><i>Amend Implementation Approach;</i></p> <p>Design proposals for both the employment allocation and district centre should be in line with the Berryfields MDA Development Brief (2004) and design codes and the Aylesbury Garden Town development principles within policy D1 and <u>the subsequent supporting Aylesbury Garden Town Framework and Infrastructure Supplementary Planning Documents (SPDs).</u></p>
MM58	93	4.91	<p><i>Amend;</i></p> <p>The housing development is based on the principle of creating three villages within the overall framework of the site. Reserved matters have been approved for two of the three villages, Oakfield Village and Orchard Green, comprising 1,353 <u>2,074</u> dwellings of which some 300 <u>696</u> are complete or with more under construction. Key elements of transport infrastructure including the Eastern Link Road and Stocklake Link are also well under way. <u>The status of the three villages is as follows:</u></p> <ul style="list-style-type: none"> • <u>Oakfield (village 2) – detailed permission for 492 dwellings (14/03486/ADP) and is now complete</u> • <u>Canal Quarter (village 3) for 1,097 dwellings</u> <ul style="list-style-type: none"> ○ <u>Phase 1 for 228 dwellings (18/01153/ADP) is now complete</u> ○ <u>Phase 2a for 383 dwellings (19/01732/ADP) is under construction</u> ○ <u>Phase 2b for 110 dwellings and the neighbourhood centre (19/02983/ADP) has detailed permission</u> ○ <u>Phase 3 for 212 homes (20/00740/ADP) has an as yet undetermined detailed application</u> ○ <u>Phase 4 for 164 dwellings and the employment area (19/04426/ADP has an as yet undetermined detailed application</u> • <u>Orchard Green (village 4) – detailed permission for 861 dwellings (15/01767/ADP) and under construction</u> <p><u>The site is expected to be completed by 2031.</u></p>
MM59	94	4.99	<i>Delete paragraph</i>
MM60	94	4.101	<i>Delete paragraph</i>
MM61	96	D-AGT6	<p><i>Add new row below size (hectares);</i></p> <p><u>Completions and expected time of delivery</u></p> <p><u>696 homes built up to 2020, 950 homes to be delivered 2020-2025 and 804 homes to be delivered 2025-2033</u></p> <p><i>Amend site specific requirements first sentence and clauses a, e, h and l and add clause k;</i></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</p>

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			<p>the principles of development for Aylesbury Garden Town and the Masterplan SPD to be prepared for the site.</p> <p>a. Provision for land for around <u>at least</u> 2,450 dwellings at a density that takes account of the adjacent settlement character and identity</p> <p>e. The development should be designed using a landscaped approach including consideration of the long-distance views of the AONB <u>as well as of potential landscape visual impact from the AONB</u></p> <p>h. Provision and management of 50% green infrastructure to link to other new development areas and the wider countryside. <u>This should incorporate: recreation and sports facilities, public open space, play areas, allotments and orchards, sustainable drainage, nature reserves and ecological enhancement areas, education/interpretation facilities and attractive pedestrian and cycle routes to the town centre</u></p> <p>i. Provision of on-site health facilities and community buildings (including temporary buildings if necessary)</p> <p>k. <u>A traffic calming scheme to the village of Bierton</u></p> <p><i>Amend second paragraph of Implementation Approach;</i></p> <p>A concept masterplan/SPD for the third village should be prepared and adopted to inform the submission of a design code and reserve matters for that village. Design should take account of the over-arching Garden Town principles (policy D1) and details within the <u>Aylesbury Garden Town Framework and Infrastructure</u> Garden Town Design SPD to ensure comprehensive development. The SPD should demonstrate how the village links to and contributes to the delivery of Aylesbury Garden Town as a whole.</p> <p><i>Include most up to date detail plans for Kingsbrook attached at end of these modifications</i></p>
MM62	98	D-AYL032	<p><i>Amend allocated for;</i></p> <p>70 <u>54</u></p> <p><i>Amend phasing row;</i></p> <p><u>Phasing Expected time of delivery</u></p> <p>Delivery within 1-15 years of VALP adoption <u>No homes to be delivered 2020-2025 and 54 homes to be delivered 2025-2033</u></p> <p><i>Amend; Site criteria <u>specific requirements</u></i></p> <p><i>Amend clause a;</i></p> <p>a. The site will make provision for approximately 70 flats at <u>least 54 dwellings</u> based on Sunley House and although much of the site could be developed though permitted development rights and/or prior approval the densities should take account of the adjacent settlement character. The site should make provisions for a comprehensive scheme including those elements of the site that are currently being marketed. Sunley House is currently occupied by the Job Centre + on the ground floor and office</p>

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			accommodation above. This office building could be converted into residential under prior approval/change of use and could yield approximately 40 <u>38</u> flats. Ashton <u>Ardenham</u> Court could also be converted into residential under Prior Approval/Change of Use and could yield approximately 16 flats
MM63	100	D-AYL073	<p><i>Amend phasing row;</i></p> <p><u>Phasing Expected time of delivery</u></p> <p>Delivery within 1-5 years of VALP adoption <u>No homes to be delivered 2020-2025 and 18 homes to be delivered 2025-2033</u></p> <p><i>Amend; Site criteria <u>specific requirements</u></i></p> <p><i>Amend clause a;</i></p> <p>a. The site will make provision for around <u>at least</u> 18 dwellings at a density that takes account of the adjacent settlement character</p>
MM64	101	D-AYL052	<p><i>Amend phasing row;</i></p> <p><u>Phasing Expected time of delivery</u></p> <p>Delivery within 6-15 years of VALP adoption <u>No homes to be delivered 2020-2025 and 23 homes to be delivered 2025-2033</u></p> <p><i>Amend; Site criteria <u>specific requirements</u></i></p> <p><i>Amend clause a;</i></p> <p>a. The site will make provision for around <u>at least</u> 23 dwellings at a density that takes account of the adjacent settlement character</p>
MM65	103	D-AYL059	<p><i>Amend phasing row;</i></p> <p><u>Phasing Expected time of delivery</u></p> <p>Delivery within 6-15 years of VALP adoption. The site has multiple occupants. <u>No homes to be delivered 2020-2025 and 14 homes to be delivered 2025-2033</u></p> <p><i>Amend; Site criteria <u>specific requirements</u></i></p> <p><i>Amend clauses a and e;</i></p> <p>a. The site will make provision for around <u>at least</u> 14 dwellings notwithstanding any permitted development rights, at a density that takes account of the adjacent settlement character including the listed buildings nearby including Royal Buckinghamshire Hospital and Ardenham House. The western section of the site is the only part suitable for redevelopment. Fairfax House is not being allocated for housing as it is currently well occupied, housing the Vale of Aylesbury Housing Trust (VAHT). This is a prominent entrance to the town and any proposal should be designed to accord with the design <u>Aylesbury Vale Design</u> SPD and express an exemplary design</p> <p>e. The existing trees and hedgerows {and/or anything else} should be retained</p>

Ref	Page	Policy/ Paragraph	Main Modification
MM66	105	D-AYL077	<i>Delete this site allocation policy</i>
MM67	106	D-AYL063	<p><i>Amend phasing row;</i></p> <p><u>Phasing Expected time of delivery</u></p> <p><u>Delivery within 1-5 years of VALP adoption 112 homes to be delivered 2020-2025 and no homes to be delivered 2025-2033</u></p> <p><i>Amend; <u>Site criteria specific requirements</u></i></p> <p><i>Amend clause a;</i></p> <p>a. The site will comply with a development brief that will steer proposals to make provision for around <u>at least</u> 112 dwellings at a density that takes account of the adjacent settlement character. The site should also retain its retail (A1E/F.2) provision on the ground floor</p>
MM68	107	D-AYL068	<p><i>Amend phasing row;</i></p> <p><u>Phasing Expected time of delivery</u></p> <p><u>Delivery within 6-15 years of VALP adoption No homes to be delivered 2020-2025 and 39 homes to be delivered 2025-2033</u></p> <p><i>Amend; <u>Site criteria specific requirements</u></i></p> <p><i>Amend clause a;</i></p> <p>a. The site will make provision for <u>at least</u> 39 dwellings at a density that takes account of the adjacent settlement character. Part of the site should be retained for hospital services</p>
MM69	108	D-AYL115	<p><i>Amend phasing row;</i></p> <p><u>Phasing Expected time of delivery</u></p> <p><u>Delivery within 6-15 years of VALP adoption 65 homes to be delivered 2020-2025 and 135 homes to be delivered 2025-2033</u></p> <p><i>Amend; <u>Site criteria specific requirements</u></i></p> <p><i>Amend clause a;</i></p> <p>a. The site will make provision for around <u>at least</u> 200 dwellings at a density that takes account of the adjacent residential character north of the railway line</p>
MM70	109	Preceding 4.110	<p><i>Insert new heading and new paragraph;</i></p> <p><u>Delivering site allocations in the rest of the district</u></p> <p><u>In order to fulfil the level of growth for Aylesbury Vale set out in policy S2 Spatial Strategy for Growth, sites have also been allocated at other settlements in the district as well as at Aylesbury Garden Town. Allocating sites in the Local Plan allows growth to be located in the most suitable sites in the most sustainable locations by taking into account, through further assessment beyond the HELAA, factors such as landscape, flooding, settlement form and site availability.</u></p> <p><i>Move former paragraph 4.123 to follow new paragraph, add new title;</i></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><u>Delivering the allocated sites – at strategic settlements and North East Aylesbury Vale</u></p> <p><i>and amend third sentence;</i></p> <p>As set out in Policies S2 and S3 <u>tables 1 and 2</u>, the strategic settlements (excluding Aylesbury) <u>and North East Aylesbury Vale</u> will provide a total of 5,730 <u>8,627</u> new homes between 2013 and 2033. Those sites that already have planning permission (as at 2016/17 <u>2019/20</u>) and homes already built in the period 2013-2017 <u>2020</u> are included in the total to be provided.</p> <p><i>Insert new paragraph to follow former paragraph 4.123;</i></p> <p><u>Aylesbury Vale will deliver a total of 30,134 new homes across the Plan period. Taking account of commitments, completions and allocations in Aylesbury Garden Town already listed in policy D1, and a windfall allowance, 13,927 homes will be delivered across the rest of the district.</u></p> <p><i>Move former paragraphs 4.124 and 4.125 to follow new paragraph and amend third sentence of former paragraph 4.124 and first sentence of paragraph 4.125;</i></p> <p>This Plan allocates the reserve sites at Buckingham and Haddenham, and just one site beyond the neighbourhood plans' expectations/allocations, at Haddenham and Winslow, specifically north of Rosemary Lane at Haddenham (<u>at least 315</u> 273 homes) and east of the B4033 at Winslow (585 <u>at least 315</u>), and allocates two further sites at Buckingham, reflecting it being the second most sustainable settlement in the district, specifically Moreton Road at Buckingham (130 homes) and land off Osier Way, south of A421 and east of Gawcott Road (420 homes).</p> <p>In terms of Wendover, approximately 1,000 homes will come forward during the Plan period at RAF Halton Camp after its closure in 2022 <u>it is fully closed in 2025</u></p> <p><i>Insert new paragraph to follow former paragraph 4.125;</i></p> <p><u>The Local Plan also allocates sites for growth within Aylesbury Vale at the edge of Milton Keynes namely North East Aylesbury Vale and this area forms its own category in the settlement hierarchy. The same appraisal process detailed above has been followed to select these sites and consideration has also been given to Milton Keynes' capacity to accommodate further growth.</u></p> <p><i>Insert new policy D2 (and renumber existing policy D2 as D3) to follow new paragraph and precede existing paragraph 4.110;</i></p> <p><u>D2 Delivering site allocations in the rest of the district</u></p> <p><u>The rest of the district outside of Aylesbury Garden Town plays an important role in delivering the required growth in the Vale. The site allocations identified in this policy should</u></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><u>be developed in accordance with policies S1, S2, S3 and S5.</u></p> <p><u>The rest of the district outside of the Garden Town, including the windfall allowance will deliver 13,927 new homes. The Policies Map allocates the following major sites in the strategic settlements and in North East Aylesbury Vale for development:</u></p> <ul style="list-style-type: none"> <u>• D-NLV001 Salden Chase, Newton Longville</u> <u>• D-WHA001 Shenley Park, Whaddon</u> <u>• D-BUC043 Land west of AVDLP allocation BU1 Moreton Road, Buckingham</u> <u>• D-BUC046 Land off Osier Way (south of A421 and east of Gawcott Road), Buckingham</u> <u>• D-HAD007 Land north of Rosemary Lane, Haddenham</u> <u>• D-HAL003 RAF Halton</u> <u>• D-WIN001 Land to east of B4033, Great Horwood Road, Winslow</u> <p><u>The following sites are also allocated in large and medium villages:</u></p> <ul style="list-style-type: none"> <u>• D-STO008 Land south of Creslow Way, Stone</u> <u>• D-WHI009 Holt's Field, Whitchurch</u> <u>• D-CDN001 Land North of Aylesbury Road and rear of Great Stone House, Cuddington</u> <u>• D-CDN003 Dadbrook Farm, Cuddington</u> <u>• D-ICK004 Land off Turnfields, Ickford</u> <u>• D-MMO006 Land east of Walnut Drive and west of Fosgate Road, Maids Moreton</u> <u>• D-NLV005 Land south of Whaddon Road and west of Lower Rd, Newton Longville</u> <u>• D-QUA001 Land south west of 62 Station Road, Quainton</u> <u>• D-QUA0014-016 Land adjacent to Station Road, Quainton</u> <p><u>The design and delivery of development at allocations in the rest of the district should adhere to the site specific allocation policies and other policies in the Plan.</u></p> <p><i>Amend heading preceding paragraph 4.110;</i></p> <p><u>Salden Chase North East Aylesbury Vale</u></p>
MM71	109	4.112	<p><i>Amend;</i></p> <p>As a result of further assessment and taking <u>Taking</u> account of the overall housing requirement for Aylesbury Vale, Salden Chase and Shenley Park <u>has</u> have been identified as the most appropriate strategic allocations to come forward at this stage.</p>

Ref	Page	Policy/ Paragraph	Main Modification
MM72	109	4.118	<i>Delete paragraph</i>
MM73	110	4.119	<i>Delete paragraph</i>
MM74	110	D-NLV001	<p><i>Amend phasing row;</i></p> <p><u>Phasing Expected time of delivery</u></p> <p>100 300 homes to be delivered 2017-2022 <u>2020-2025</u> and 1,755 <u>1,555</u> homes to be delivered from 2023 <u>2025-2033</u></p> <p><i>In allocated for box, amend Internal Road layout paragraph to add new first sentence;</i></p> <p><u>The objective is to ensure that high quality walking, cycling and public transport links to and from Newton Longville, Bletchley and the city of Milton Keynes are an integral part of the development.</u></p> <p><i>In allocated for box, add additional bullet point to public rights of way;</i></p> <p><u>o Provision should be made for adequate green links to Tattenhoe Park</u></p> <p><i>Amend site-specific requirements;</i></p> <p>Conserving and enhancing the natural environment. In terms of the impact on the landscape, site proposal should use land efficiently and create a well-defined boundary <u>as the western edge of Milton Keynes between the settlement and the countryside, ensuring that Newton Longville, Whaddon, Mursley and Far Bletchley remain separately identifiable.</u></p> <p><i>Amend Landscape;</i></p> <p>Site proposals will be required to respect and complement the physical characteristics of the site and its surroundings, <u>including the implementation of a defensible boundary along the western edge of Milton Keynes. Proposals will be required to identify the building tradition of the locality, and the scale and context of the setting, the natural qualities and features of the area, and the effect of the development on important public views and skylines including the protection of Newton Longville and Whaddon villages.</u></p> <p><i>Amend Noise contamination;</i></p> <p>An Environmental Management plan will be required via a condition and with detailed consideration of the layout at reserved matters stage <u>to take account of the delivery of EWR, safeguarding against noise.</u> A condition can be attached in case any contamination is found.</p> <p><i>Amend Place-making Framework;</i></p> <p>The site will comprise: residential development; employment area; neighbourhood centre; land for a three form entry primary school with early years provision and four form entry secondary school; green infrastructure and associated drainage; <u>and highway and transport infrastructure.</u> and the The proposed distribution of uses across the site are set in the parameters plan.</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><i>Amend community facilities and Green Infrastructure;</i></p> <p>The site will need to make provision for a comprehensive network of multifunctional open spaces and green corridors <u>including a linear park to the south of the site</u> with both formal and areas of informal public open space. This will include 53.67ha of green open space and 1.18ha of allotment land, nine locally equipped areas of play (LEAPs) and also two neighbourhood equipped areas of play, which each include a multi-use games area. In addition to the provision of LEAPs and NEAPs on site, youth shelter, a multi-use games area (MUGA), sports hall, changing pavilion, skateboard park, sports pitches, cricket wicket, tennis courts and a community centre will be required through a S106 Agreement. <u>The existing woodland priority habitat in the north of the site should be retained.</u> Multi functional Green Infrastructure will be required to control surface water flows and flooding. <u>Impact on the Howe Wood SSSI must be kept to a minimum and green links to Tattenhoe Park must be provided.</u></p> <p><i>Insert additional clause;</i></p> <p><u>Flood Mitigation</u></p> <p><u>Provision of a sustainable and strategic flood mitigation and urban drainage scheme linked to multi-functional Green Infrastructure must be provided.</u></p> <p><i>Amend final sentence of Implementation Approach;</i></p> <p>The details of the cycle and pedestrian infrastructure within the site <u>and linking to Newton Longville, Bletchley and Central Milton Keynes</u> will need to form and be considered as part of any future reserved matters application.</p> <p><i>Insert concept plan for D-NLV001</i></p>
MM75	114	Following D-NLV001	<p><i>Insert new heading, four new paragraphs and new site policy;</i></p> <p><u>Shenley Park</u></p> <p><u>The site covers an area of around 99 ha and is in predominantly agricultural use with 4.119 areas of woodland plantations. Surrounding land uses are similarly predominantly agricultural although the eastern boundary is defined by the Milton Keynes Boundary Walk, the existing residential development and land currently being developed as part of Milton Keynes.</u></p> <p><u>Other than the 11KV overhead powerlines crossing the site there are no other utilities 4.120 present that would significantly constrain the proposed development and sufficient new utility infrastructure can be provided.</u></p> <p><u>There is one footpath running across the southern part of the site. Long distance 4.121 bridleways run along the northern and eastern boundaries.</u></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>The topography of the southern half of the site rises from the A421 to the Shenley Road. 4.122 The remainder of the site from Shenley Road is relatively flat to the northern boundary.</p> <p><u>D-WHA001 Shenley Park</u></p> <p><u>Site reference</u> WHA001</p> <p><u>Size (hectares)</u> About 99ha</p> <p><u>Allocated for (key developments and land use requirements)</u> To create an exemplar development, of regional significance, which will be a great place to live, work and grow. Built to a high sustainable design and construction standards, the development will provide a balanced mix of facilities to ensure that it meets the needs and aspirations of new and existing residents, at least 1,150 homes, 110 bed care home/extra care facility, new primary school, subject to need a site for new secondary school, multi-functional green infrastructure (in compliance with Policies I1 and I2 and associated Appendices), mixed use local centre, exemplary Sustainable Drainage Systems, new Link Road between A421 Buckingham Road and H6 and or H7 Childs Way/Chaffron Way, public transport and cycling and walking links.</p> <p><u>Source</u> HELAA</p> <p><u>Current neighbourhood plan status</u> N/A</p> <p><u>Expected time of delivery</u> 50 homes to be delivered 2020-2025 and 1,100 homes to be delivered 2025-2033</p> <p><u>Site-specific Requirements</u> 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. To ensure a comprehensive development of the site an SPD is to be prepared for the site and in addition, proposals should comply with all of the following criteria:</p> <p>a. The site will make provision for at least 1,150 dwellings at a density that respects the adjacent settlement character and identity. To ensure that strong place shaping, community safety and sustainability principles are embedded throughout, creating a socially diverse place with a mix of dwelling types and tenure mix including a minimum of 25% affordable housing 'pepper-potted' throughout the site.</p> <p>b. Provision of 110 bed care home/extra care facility</p> <p>c. Provision of land, buildings and car parking for a 2FE primary school (capacity 420) with 52 place nursery.</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><u>Infrastructure will need to be provided and phased alongside development, the details of which will be agreed through developer contribution agreements.</u></p> <p><u>d. Subject to detailed discussions and agreement with the Education Authority, a financial contribution towards existing secondary schools will be required or provision of a site for a new secondary school if the need for an on site facility is proven; and a financial contribution to special needs education</u></p> <p><u>e. Provision of land, buildings and car parking for new local centre including community hall and a contribution towards or delivery of a healthcare facility either by way of site provision or direct funding (including temporary buildings if necessary). To create a sustainable community providing a mix of uses to ensure that housing development is accompanied by infrastructure services and facilities</u></p> <p><u>f. The site will be designed using a landscape-led and green infrastructure approach. The development design and layout will be informed by a full detailed landscape and visual impact assessment (LVIA) that integrates the site into the landscape and the existing network of green infrastructure within Milton Keynes and Buckinghamshire. It will provide a long term defensible boundary to the western edge of Milton Keynes. This recognises that, whilst being located totally within Aylesbury Vale, the development will use some facilities in Milton Keynes, given its proximity. Milton Keynes also provides an access point into the site</u></p> <p><u>g. Conserve the setting of Whaddon village and Conservation Area by creating a substantial, well designed and managed countryside buffer (not formal open space) and enhanced Briary Plantation woodland belt between the development and the village of Whaddon</u></p> <p><u>h. Create high quality walking and cycling links to and from Whaddon, Bletchley and Milton Keynes as an integral part of the development and shall include an extension of Tattenhoe Valley Park into the site</u></p> <p><u>i. An ecological management plan shall be submitted to and approved in writing by the Council covering tree planting, hedge planting, pond creation and ongoing management of the site</u></p> <p><u>j. Existing vegetation should be retained where practicable, including existing woodlands and hedgerows. Specific attention should be made to enhancing Briary Plantation, Bottlehouse Plantation and other significant blocks of woodlands/hedgerows within or on the edge of the site</u></p> <p><u>k. Hard and soft landscaping scheme will be required to be submitted for approval</u></p> <p><u>l. Archaeological assessment and evaluation shall be required to be submitted to the Council. Development must minimise impacts on the Statutory Ancient Monument of Site of Snelshall Monastery on the northern boundary of the site</u></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><u>m. The scheme layout shall have regard to the findings of an archaeological investigation and preserves in situ any remains of more than local importance</u></p> <p><u>n. The development must provide a satisfactory vehicular access from the A421 Buckingham Road</u></p> <p><u>o. More detailed traffic modelling will be required to inform on the extent and design of off site highway works to determine whether the section of A421 between the Bottledump roundabout and the site access roundabout needs to be dualled. The scope and design of any detailed traffic modelling must be agreed by Buckinghamshire Council as the highway authority in consultation with the Milton Keynes highway authority.</u></p> <p><u>p. Provide for a Link Road connection through the site to Grid Road H6 Childs Way and/or H7 Chaffron Way which shall include</u></p> <ul style="list-style-type: none"> <u>• A Redway providing direct connection through the site to the existing Redway Network</u> <u>• A public transport route to incorporate Mass Rapid Transit through the site to Grid Road H6 Childs Way and/or H7 Chaffron Way</u> <p><u>q. Existing public rights of way need to be retained, enhanced and integrated into the development with safe and secure environments as part of a wider network of sustainable routes (utilising amongst others the Redway and Sustrans network), to directly and appropriately link the site with surrounding communities and facilities including the extension of bridleways into the site (Bridleway WHA12/2 and Shenley Brook End Bridleway 006) to Redway standard</u></p> <p><u>r. Provision of public transport service improvements and associated new facilities into Milton Keynes, including new or improved links to Bletchley railway station, and to surrounding areas</u></p> <p><u>s. An air quality and noise assessment shall be submitted to and approved in writing by the Council prior to development commencing</u></p> <p><u>t. A surface water drainage strategy will be required for the site, based on sustainable drainage principles and an assessment submitted to the Council for approval and should ensure that development does not increase flood risk elsewhere. The strategy will create new green infrastructure corridors along major surface flowpaths. Development on this site, which would drain into the management area for the Loughton Brook, will seek to reduce flood risk downstream on the Loughton Brook</u></p> <p><u>u. Detailed modelling will be required to confirm 1 in 20, 100 and 1,000 year extents and 1 in a 100 year plus climate change extents on the ordinary watercourse. Climate change modelling should be undertaken using the up-to-date Environment Agency guidance for the type of development and level of risk and should consider surface water risk. The impact of culvert blockage should be considered for the</u></p>

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			<p><u>modelled watercourse. The impacts of climate change must be taken into account in designing the site's SuDs and in any other flood mitigation measures proposed</u></p> <p><u>v. A foul water strategy is required to be submitted to and approved in writing by the Council following consultation with the water and sewerage undertaker.</u></p> <p><u>w. An updated assessment of sewerage capacity and water supply network shall be carried out, working with Anglian Water, to identify the need for infrastructure upgrades and how and when these will be carried out to inform site delivery.</u></p> <p><u>x. The road access to the A421 will be designed to avoid areas of flood zone 3a with climate change and remain operational and safe for users in times of flood.</u></p>
MM76 not used			
MM77	115	4.120 and 4.121	<p><i>Move paragraphs 4.120 and 4.121 and accompanying titles to the start of strategic delivery chapter 4 (page 61) to become paragraphs 4.1 and 4.2. Modify title and amend paragraph 4.121:</i></p> <p><u>Delivering growth at strategic settlements, larger and medium villages</u></p> <p>4.121 <u>4.2</u> As set out in the spatial strategy (S2), sites are allocated based on the capacity of a settlement to accommodate development, taking into account factors such as landscape, flooding and settlement form as well as site availability. Site-specific allocations for strategic settlements (other than Aylesbury), <u>the north east of Aylesbury Vale</u>, larger and medium villages are set out in the following sections. <u>The sites at these allocations are sufficient to meet the development needs for the area.</u></p>
MM78 not used			
MM79	115	4.122 and D2	<p><i>Move paragraph 4.122 and policy D2 (renumbered D3) to follow allocation D-QUA014-016, insert new heading and amend;</i></p> <p><u>Proposals for non-allocated sites at strategic settlements, larger villages and medium villages</u></p> <p>Sites not allocated in this Plan, or in a made Neighbourhood Plan or committed by planning permission will not normally be permitted, as deliver the district's required level of growth is to be met in full by these allocations. <u>Proposals for development in other locations will be determined on the basis of the policies within this Plan and made Neighbourhood plans. 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 where the proposals are for small-scale</u></p>

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			<p>areas of land in accordance with Policy D2. Proposals will need to be accompanied by evidence demonstrating how the site can be delivered in a timely manner and meet all of the criteria in the Policy below.</p> <p>D23 Proposals for non-allocated sites at strategic settlements, larger villages and medium villages</p> <p><i>Prior to the first line of the policy add the title</i></p> <p><u>1. Small scale development and infilling</u></p> <p>Development <u>proposals</u> in strategic settlements, larger and medium villages that are not allocated in this plan or in a made neighbourhood plan will be restricted to small scale areas of land within the built-up areas of settlements. Subject to other policies in the Plan, permission will be granted for development comprising:</p> <ul style="list-style-type: none"> a. infilling of small gaps in developed frontages in keeping with the scale and spacing of nearby dwellings and the character of the surroundings, or b. development that consolidates existing settlement patterns without harming important settlement characteristics, and does not comprise partial development of a larger site <p><i>Following criterion b. and ahead of the next paragraph add the title</i></p> <p><u>2. Larger scale development</u></p> <p><u>Exceptionally further</u> Further development beyond allocated sites and small-scale development as set out in criteria a) or b) above will only be permitted where the Council's monitoring of housing delivery across the district shows that the allocated sites are not being delivered at the anticipated rate. Proposals will need to be accompanied by evidence demonstrating how the site can be delivered in a timely manner. The proposal must contribute to the sustainability of that settlement, be in accordance with all applicable policies in the Plan, and fulfil all of the following criteria:</p> <p><i>Revise criterion c. as follows</i></p> <ul style="list-style-type: none"> c. be located within or adjacent to the existing developed footprint of the settlement * or, <u>except</u> where there is a made neighbourhood plan which includes <u>defines</u> a settlement <u>or development</u> boundary, <u>where</u> the site is <u>should be</u> located entirely within that settlement boundary d. not lead to coalescence with any neighbouring settlement e. be of a scale and in a location that is in keeping with the existing form of the settlement, and not adversely affect its character and appearance f. respect and retain natural boundaries and features such as trees, hedgerows, embankments and drainage ditches g. not have any adverse impact on environmental assets such as landscape, historic environment, biodiversity,

Ref	Page	Policy/ Paragraph	Main Modification
			<p>waterways, open space and green infrastructure, and</p> <p>h. provide appropriate infrastructure provision such as waste water drainage and highways.</p> <p><i>Revise footnote as follows</i> *the existing developed footprint is defined as the continuous built form of the village settlement, and <u>generally</u> excludes <u>remote</u> individual buildings and groups of dispersed buildings;. This includes <u>The exclusion covers</u> former agricultural barns that have been converted, agricultural buildings <u>(but does not preclude permitted development for converting agricultural buildings to residential – Town and Country Planning (General Permitted Development)(England) Order2015 as amended – Class Q)</u> and associated land on the edge of the village settlement and gardens, paddocks and other undeveloped land within the curtilage of buildings on the edge of the settlement where the land relates more to the surrounding countryside than to the built-up area of the village settlement.</p>
MM80 not used			
MM81	117	4.124	<p><i>Amend third sentence;</i></p> <p>This Plan allocates the reserve sites at Buckingham and Haddenham, and just one site beyond the neighbourhood plan's plans' expectations/allocations, at Haddenham and Winslow, specifically north of Rosemary Lane at Haddenham (315 <u>at least 269</u> homes) and east of the B4033 at Winslow (585 <u>at least 315</u> homes), and allocates two further sites at Buckingham, reflecting it being the second most sustainable settlement in the district, specifically Moreton Road at Buckingham (at least 130 homes) and land off Osier Way, south of A421 and east of Gawcott Road (at least 420 homes).</p>
MM82	119	D-BUC043	<p><i>Amend phasing row;</i></p> <p><u>Phasing Expected time of delivery</u></p> <p>The site is expected to be delivered between 2018 and 2023 <u>110 homes to be delivered 2020-2025 and 20 homes to be delivered 2025-2033</u></p> <p><i>Amend; <u>Site criteria specific requirements</u></i></p> <p><i>Amend clauses a, j and k and add l and m;</i></p> <p>a. Provision of around <u>at least</u> 130 dwellings at a density that takes account of the adjacent settlement character and identity</p> <p>j. A foul water strategy is required to be submitted to and approved in writing by the council <u>following consultation with the water and sewerage undertaker.</u></p> <p>k. An assessment of sewerage capacity and verified resources and water supply network will be required in</p>

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			<p>consultation with Anglian Water. The water supply <u>network</u> is likely to require an infrastructure upgrade by Anglian Water to serve the level of growth on the site. The Buckingham Wastewater Treatment Works needs upgrading and the delivery of the site will need to <u>be aligned work</u> with investment in Anglian Water's aAsset mManagement pPlan for delivering the needed upgrade. The surface water network capacity for the sewerage system also needs upgrading.</p> <p><u>l. A financial contribution will be needed towards funding appropriate elements of the Buckingham Transport Strategy</u></p> <p><u>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 following a maintenance period and a commuted sum paid to the Town Council for the upkeep of that land.</u></p>
MM83	120	D-BUC051	<i>Delete allocation policy</i>
MM84	121	D-BUC046	<p><i>Amend size (hectares);</i> 25.8 <u>22.7</u>ha</p> <p><i>Amend current neighbourhood plan status;</i> Neighbourhood plan, made in October 2015. The land has no notation but is outside the settlement boundary. <u>The neighbourhood plan is in early stages of review.</u></p> <p><i>Amend phasing row;</i> <u>Phasing Expected time of delivery</u> 400 <u>130</u> homes to be delivered 2020-2025 and 320 <u>290</u> homes from to be delivered 2024<u>2025-2033</u></p> <p><i>Amend; Site criteria <u>specific requirements</u></i> <i>Amend clauses a, d, e, and h and add i;</i></p> <p>a. Provision of around <u>at least</u> 420 dwellings at a density that takes account of the adjacent settlement character and identity</p> <p>d. The development must provide a satisfactory vehicular access to be agreed with Buckinghamshire County Council. The primary vehicular access should be off Gawcott Road and Osier Way. A transport assessment will be required to demonstrate access and impact are acceptable and achievable by all modes of transport</p> <p>e. An ecological management plan (EMP) shall be submitted to the Council for approval. Wooded areas on the site have a high ecology impact and these would need to be retained along with the provision of 20m buffer either side of the stream and pond</p> <p>h. An assessment of sewerage capacity and water resources and water supply <u>network</u> will be required in consultation with Anglian Water. The water supply <u>network</u> is likely to require an infrastructure upgrade by Anglian Water to serve the level of growth on the site. The Buckingham Wastewater</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>Treatment Works needs upgrading and the delivery of the site will need to <u>be aligned work with investment in</u> Anglian Water's <u>a</u>Asset <u>m</u>Management <u>p</u>lan <u>for delivering the</u> needed upgrade. The surface water network capacity for the sewerage system also needs upgrading.</p> <p><u>i. A financial contribution will be required towards funding appropriate elements of the Buckingham Transport Strategy.</u></p>
MM85	123	D-HAD007	<p><i>Amend size (hectares) row; 40 ha <u>13.5 ha</u></i></p> <p><i>Amend allocated for row; 345 <u>273</u> homes</i></p> <p><i>Amend phasing row;</i></p> <p><u>Phasing Expected time of delivery</u></p> <p>50 <u>128</u> homes to be delivered 2017-22 <u>2020-2025</u> and 265 <u>145</u> homes from to be delivered <u>2025-2033</u></p> <p><i>Amend; <u>Site criteria specific requirements</u></i></p> <p><i>Amend clauses a and h;</i></p> <p>a. Provision of around <u>at least</u> 345 <u>273</u> dwellings</p> <p>h. The site should be accessed via Churchway with the retention of the existing footpaths and further provision of pedestrian and cycle linkages through the site and into the village including along Churchway, to the train station and with connections with the adjoining approved Haddenham Airfield development if appropriate and possible <u>(site HAD005 on the VALP Policies Map)</u></p>
MM85A	125	4.135	<p><i>Amend penultimate sentence;</i></p> <p>Therefore it is considered that redevelopment and/or refurbishment of existing buildings in the first phase of development would be appropriate and not require that the site be removed from the Green Belt at this stage.</p>
MM86	125	4.136	<p><i>Add;</i></p> <p><u>The amount and quality of existing sports provision within the allocation and elsewhere around the camp is a valuable asset which is why policy D-HAL003 requires its retention wherever possible in any proposed redevelopment.</u></p>
MM87	125	4.137	<p><i>Amend;</i></p> <p>The development of this site will adhere to the following place-shaping principles:-</p> <ul style="list-style-type: none"> • In the first phases, development will be concentrated on those areas that are already built-up, through the redevelopment or remodelling of existing buildings. • Provision of 50% green infrastructure, to reflect the high level of open space already present on the site including green corridors linking development with the surrounding countryside • Provision of links to and from Aylesbury Town and to the wider area including for walking and cycling • Respond positively to the best characteristics of the surrounding area.

Ref	Page	Policy/ Paragraph	Main Modification
MM88	126	D-HAL003	<p><i>Amend allocated for row;</i></p> <p>Around <u>At least</u> 1,000 homes during the Plan period and associated infrastructure, services and facilities including a primary school, new local centre, new access routes if needed and new green infrastructure</p> <p><i>Add new row below Allocated for row;</i></p> <p><u>Expected time of delivery</u></p> <p><u>25 homes to be delivered 2020-2025 and 975 homes to be delivered 2025-2033</u></p> <p><i>Amend site specific requirements clauses a, b, e and f and add clauses l and j;</i></p> <p>a. Provision of land for <u>at least</u> 1,000 dwellings during this plan period at a density that takes account of the existing curtilage, <u>the scale and massing</u> of the buildings on the site, and that of the adjacent settlement character and identity if appropriate, <u>as well as retaining the openness of the green belt</u></p> <p>b. Be planned <u>in a manner that responds positively to the best characteristics of the surrounding area</u> using a landscape-led approach, taking account of the character and setting of the Chilterns AONB</p> <p>e. Establishment of and safeguarding for a network of cycling and walking links <u>to and from Aylesbury Town and to the wider area</u></p> <p>f. Provision of <u>50% green infrastructure, to reflect the high level of open space already present on the site including green corridors</u>, to link to other new development areas and the wider countryside</p> <p>i. <u>The conservation and enhancement of heritage assets and their settings whilst ensuring viable uses consistent with their conservation</u></p> <p>j. <u>The retention of existing sports facilities as part of a long term strategy for sport and recreation to serve new residents and the existing community</u></p> <p><i>Amend phasing and delivery programme row;</i></p> <p>Development of this site will come forward towards the latter part of the plan period as the site will not be <u>fully</u> released until 2022 <u>2025</u>.</p> <p>Further <u>Detail</u> about phasing and implementation will be set out in the masterplan SPD for the site</p> <p><i>Amend implementation approach row;</i></p> <p>Development at RAF Halton will come forward towards the latter end of the Plan period, and only once a masterplan SPD for the allocation has been prepared and adopted by the Council. Proposals for development within the RAF Halton Strategic Site Allocation will be expected to demonstrate how they <u>deliver a comprehensive redevelopment of this site and positively contribute to the achievement of the SPD and the Aylesbury Garden Town principles as set out in Policy D1.</u></p>

Ref	Page	Policy/ Paragraph	Main Modification
MM89	127	D-WIN001	<p><i>Amend allocated for row;</i></p> <p><u>At least 585 315</u> homes and green infrastructure</p> <p><i>Amend phasing row;</i></p> <p><u>Phasing Expected time of delivery</u></p> <p>50 <u>140</u> homes to be delivered 2017-22 <u>2020-2025</u> and 535 <u>175</u> homes from to be delivered 2025-2033</p> <p><i>Amend; <u>Site criteria specific requirements</u></i></p> <p><i>Amend clauses a, d and e;</i></p> <p>a. Provision of around <u>at least 585 315</u> dwellings</p> <p>d. <u>The built form of the development will be limited to areas outside of those shown on the VALP Policies Map as 'Not built development'.</u> The development will limit built form beyond the watercourse, development will only be to the south of this nearest to the existing built-up area and the proposed railway station</p> <p>e. The existing trees, hedgerows and ponds should be retained <u>or if necessary replanted</u> and where possible integrated into the green infrastructure provision. There should be an ecological buffer provided along the watercourse to the north of the site</p>
MM89A	129	4.141	<p><i>Amend;</i></p> <p>Larger villages are the largest, most sustainable villages that have reasonable access to services and facilities. As set out in Policies S2 and S3, larger villages will provide a total of 2,274 <u>2,408</u> new homes between 2013 and 2033. Those sites that already have planning permission (as at 2017/18 <u>2019/20</u>) and homes already built in the period 2013-2018 2020 are included in the total to be provided.</p>
MM90	129	4.143	<p><i>Delete;</i></p> <ul style="list-style-type: none"> • Steeple Claydon (118) <p><i>Amend;</i></p> <ul style="list-style-type: none"> • Stone (10 <u>26</u>)
MM91	129	4.145	<p><i>Amend;</i></p> <p><u>Sites allocated in this Plan or in a made Neighbourhood Plan or committed by planning permission will normally deliver Aylesbury Vale's required level of growth in full. Proposals for development in other locations will be determined on the basis of the policies within this Plan and made Neighbourhood plans. Exceptionally additional larger scale</u> d <u>Development proposed</u> in the larger villages <u>on land</u> that is not allocated in the Local Plan or a neighbourhood plan <u>will</u> only be permitted in exceptional circumstances where it can be demonstrated <u>through the council's monitoring of housing delivery</u> that sites allocated are not <u>being delivered coming forward</u> at the rate anticipated. Proposals will need to be accompanied by evidence demonstrating how the site can be delivered in a timely manner, along with satisfying each of the criteria set out in policy D2 <u>D3</u> above.</p>

Ref	Page	Policy/ Paragraph	Main Modification
MM92	130	4.146, 4.147D- SCD003	<i>Delete allocation policy and supporting paragraphs</i>
MM93	131	D-SCD008	<i>Delete allocation policy</i>
MM94	132	D-STO008	<p><i>Amend allocated for row;</i> 40 <u>26</u> homes, green infrastructure <i>Amend phasing row;</i> <u>Phasing Expected time of delivery</u> The site is expected be delivered between 2017 and 2022 <u>26 homes to be delivered 2020-2025 and no homes to be delivered 2025-2033</u> <i>Amend; <u>Site criteria specific requirements</u></i> <i>Amend clause a;</i> a. Provision of around <u>at least</u> 40 <u>26</u> dwellings</p>
MM95	133	D-WHI009	<p><i>Amend phasing row;</i> <u>Phasing Expected time of delivery</u> The site should be delivered during 2018-2023 <u>22 homes to be delivered 2020-2025 and no homes to be delivered 2025-2033</u> <i>Amend; <u>Site criteria specific requirements</u></i> <i>Amend clause a;</i> Provision of around <u>at least</u> 22 dwellings at a density that takes account of the adjacent settlement character and identity</p>
MM95A	134	4.151	<p><i>Amend;</i> Medium villages are moderately well served with services and facilities and can therefore be considered to be reasonably sustainable villages. As set out in Policies S2 and S3, medium villages will provide a total of 1,282 <u>1,423</u> new homes between 2013 and 2033. Those sites that already have planning permission (as at 2017/18 <u>2019/20</u>) and homes already built in the period 2013- 2018 <u>2020</u> are included in the total to be provided.</p>
MM96	134	4.153	<p><i>Amend;</i> Allocations are therefore made at the following medium villages:</p> <ul style="list-style-type: none"> • Cuddington (24 <u>23</u>) • Ickford (20 <u>30</u>) • Maids Moreton (170) • Marsh Gibbon (9) • Newton Longville (17) • Quainton (37)
MM97	134	4.154	<p><i>Amend;</i> <u>Sites allocated in this Plan or in a made Neighbourhood Plan or committed by planning permission will normally deliver</u></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>Aylesbury Vale's required level of growth in full. Proposals for development in other locations will be determined on the basis of the policies within this Plan and made Neighbourhood plans. Exceptionally a <u>Additional larger scale development proposed</u> in the medium villages <u>on sites</u> that are not allocated either in the Local Plan or neighbourhood plan will only be permitted in exceptional circumstances where it can be demonstrated <u>through the council's monitoring of housing delivery</u> that sites allocated are not <u>being delivered coming forward</u> at the rate anticipated. Proposals will need to be accompanied by evidence demonstrating how the site can be delivered in a timely manner, along with satisfying the each of the criteria set out in Policy <u>D3 D4</u> above.</p>
MM98	135	D-CDN001	<p><i>Amend size (hectares) row; 0.27ha <u>0.6ha</u></i> <i>Amend allocated for row;</i> 6 <u>8</u> dwellings <i>Amend phasing row;</i> <u>Phasing Expected time of delivery</u> 1—5 years <u>Eight homes to be delivered 2020-2025 and no homes to be delivered 2025-2033</u> <i>Amend; Site criteria <u>specific requirements</u></i> <i>Amend clause a;</i> a. Provision of around at least six <u>eight</u> dwellings at a density that takes account of the adjacent settlement character and identity</p>
MM99	135	D-CDN003	<p><i>Amend phasing row;</i> <u>Phasing Expected time of delivery</u> 1—5 years <u>No homes to be delivered 2020-2025 and 15 homes to be delivered 2025-2033</u> <i>Amend; Site criteria <u>specific requirements</u></i> <i>Amend clause a;</i> a. Provision of <u>at least</u> 15 dwellings at a density that takes account of the adjacent settlement criteria and identity</p>
MM100	137	D-ICK004	<p><i>Amend size (hectares) row; 1.4ha <u>1.6ha</u></i> <i>Amend allocated for row; 20 <u>30</u> dwellings</i> <i>Amend source row;</i> <u>HELAA and planning application 17/02516/AOP</u> <i>Amend current neighbourhood plan status row;</i> No neighbourhood plan <u>Between Pre Submission and Submission stage</u> <i>Amend phasing row;</i> <u>Phasing Expected time of delivery</u> This site is expected to be delivered between 2018-2023. <u>30 homes to be delivered 2020-2025 and no homes to be delivered 2025-2033</u></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>Amend; Site criteria <u>specific requirements</u></p> <p>Amend clause a;</p> <p>a. Provision of around <u>at least 20 30</u> dwellings</p>
MM101	138	D-MMO006	<p>Amend size (hectares) row; 7.7ha <u>8.8ha</u></p> <p>Amend source row;</p> <p>HELAA and planning application 16/00151/AOP (pending resolution to grant planning permission subject to Section 106 agreement)</p> <p>Amend phasing row;</p> <p><u>Phasing Expected time of delivery</u></p> <p>The site is expected to be delivered between 2017 and 2022. 65 homes to be delivered 2020-2025 and 105 homes to be delivered 2025-2033</p> <p>Amend; Site criteria <u>specific requirements</u></p> <p>Amend clauses a, c and e and add n;</p> <p>a. Provision of <u>at least</u> 170 dwellings at a density that takes account of the adjacent settlement character and identity and the edge of countryside location</p> <p>c. A satisfactory new vehicular means of access to Fosrote Road and Walnut Drive, including satisfactory visibility splays to Fosrote Road, a scheme for parking, garaging, manoeuvring and a cyclingle and walking movement strategy needs to be proposed in a transport assessment and transport statement must be agreed by the Council setting out necessary highways improvements <u>including triggers associated with the progress of the development as required</u></p> <p>e. An updated assessment of wastewater treatment works capacity and surface water network capacity needs to be carried out, working with Anglian Water, to identify the need for infrastructure upgrades and how and when these will be carried out to inform site delivery. Furthermore, development shall not begin until a surface water drainage scheme for the site, based on sustainable drainage principles and an assessment of the hydrological and hydro-geological context of the development, has been submitted to and approved in writing by the Local Planning authority</p> <p><u>n. A financial contribution will be required towards funding appropriate elements of the Buckingham Transport Strategy</u></p>
MM102	140	4.159, 4.160 and D-MGB003	Delete allocation policy and supporting paragraphs
MM103	141	D-NLV005	<p>Amend phasing row;</p> <p><u>Phasing Expected time of delivery</u></p> <p>Delivery within 1-5 years of VALP adoption 17 homes to be delivered 2020-2025 and no homes to be delivered 2025-2033</p> <p>Amend; Site criteria <u>specific requirements</u></p> <p>Amend clause a;</p>

Ref	Page	Policy/ Paragraph	Main Modification
			a. The site will make provision for at least around 17 dwellings at a density that takes account of the adjacent settlement character
MM104	142	D-QUA001	<p><i>Amend phasing row;</i></p> <p><u>Phasing Expected time of delivery</u></p> <p>The site is anticipated to be delivered between 2018 and 2023. 13 homes to be delivered 2020-2025 and no homes to be delivered 2025-2033</p> <p><i>Amend; <u>Site criteria specific requirements</u></i></p> <p><i>Amend clause a;</i></p> <p>a. Provision for at least around 13 dwellings at a density that takes account of the adjacent settlement character and identity</p>
MM105	143	D-QUA014-016	<p><i>Amend phasing row;</i></p> <p><u>Phasing Expected time of delivery</u></p> <p>The site is anticipated to be delivered between 2018 and 2023. No homes to be delivered 2020-2025 and 24 homes to be delivered 2025-2033</p> <p><i>Amend; <u>Site criteria specific requirements</u></i></p> <p><i>Amend clause a;</i></p> <p>a. Provision for at least around 24 dwellings at a density that takes account of the adjacent settlement character and identity</p>
MM106	145	4.167	<p><i>Amend;</i></p> <p>The overall spatial strategy set out in policy S2 is to direct new development to the larger settlements, with moderate amounts of development in villages and very restricted development in the other settlements that are not defined as villages in the settlement hierarchy. This is because the 'other' settlements in the settlement hierarchy have very limited facilities and are therefore not regarded as sustainable locations for strategic growth. Importantly the communities in those 'other' settlements can still however seek to allocate land for development in neighbourhood plans. New housing development at other settlements will be very strictly controlled to ensure that new development is directed to the most sustainable locations in the district. The replacement of existing homes and the infilling of one or two homes in an otherwise built-up frontage is not regarded as strategic growth and will also generally be acceptable, provided that the proposal is in accordance with all other relevant policies in the development plan Local Plan.</p>
MM107	145	D4	<p><i>Amend;</i></p> <p>In other settlements, where there is no made neighbourhood plan in place, permission for the construction of new homes will only be granted:-</p> <p>a. in the exceptional circumstances of providing affordable housing to meet local housing needs established through a</p>

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			housing need survey, or housing necessary for the purposes of essential rural needs, or b. for infilling of small gaps in developed frontages with one or two homes in keeping with the scale and spacing of nearby homes and for the replacement of existing homes in their original curtilage, where there would be no adverse effect on the character of the countryside or other planning interests, subject to other policies in the Local Plan.
MM108	146	4.174	<i>Amend;</i> Continuing provision of land and premises suitable for employment uses is needed, of a type and scale appropriate to the characteristics of the local area. This should provide sufficient opportunities for employment needs to be met locally, reduce the need to travel to work, and promote economic growth and social inclusion. This will be achieved by the protection of suitable existing employment sites, (including enterprise zones), from other forms of development, existing commitments and allocations, <u>as set out in policies E1 and E2</u> . A flexible approach is required to allow employment development to come forward on other suitable sites where a specific requirement needs to be met. Re-use or replacement of an existing building in an urban or rural area will be supported provided <u>it is appropriate as per the conditions of policy D5 this is well designed, appropriate to its context having regard to the scale of the proposal, location and impact on the surrounding area.</u>
MM109	147	D5	<i>Amend criterion d and entry for Woodlands, College Road;</i> d. through the appropriate re-use or replacement of an existing building <u>provided this is well designed, appropriate to its context having regard to the scale of the proposal, location and impact on the surrounding area.</u> Or, Woodlands, College Road (part of <u>Arla/Woodlands/Arla Enterprise Zone</u>): 25,600 sqm B1b, 44,400 sqm B2 and 32,800 sqm B8 (total 102,800 b use) (see Policy D-AGT3)
MM110	159	D7	<i>Amend third paragraph;</i> The policies map also identifies an area for the Aylesbury transport hub. This area is allocated for comprehensive mixed use redevelopment including co-locating the bus and railway stations to create a new public transport interchange, provision of new residential units, public realm improvements, connectivity improvements to the rest of the town, new open space, <u>new green infrastructure (in line with policy NE1 and I1)</u> and other main town centre uses including a new hotel and the relocation of the superstore.
MM111	159	D8	<i>Amend;</i> Elsewhere in the town centre, proposals for retail and other main town centre uses will be supported to reflect Aylesbury's status as Garden Town and the opportunities this will bring. Proposals should contribute positively to improving the quality of the town centre and delivering the

Ref	Page	Policy/ Paragraph	Main Modification
			vision and strategic aims for the town centre set out above and in accordance with the latest published town centre plan. Proposals should have particular regard to enhancements to the built environment, improvements for pedestrian access and environmental enhancements (<u>in line with policy NE1 and I1</u>) to the public realm.
MM112	164	5.2	<i>Delete paragraph</i>
MM113	165	5.6	<i>Delete final sentence</i>
MM114	165	5.7	<p><i>Amend;</i></p> <p>Applicants seeking a lower percentage of affordable housing than sought by the policy must demonstrate why it is not economically viable to provide the required level. Open book calculations <u>verified by an independent consultant chosen by the Council</u> will need to be provided by the applicant <u>to demonstrate why the required level of affordable housing cannot be provided</u> and then verified at their expense by an independent consultant chosen by the Council who will then give it their consideration. Applicants will need to demonstrate that the viability assessment in place to support the Local Plan does not address the factors that they consider make the proposed development of the site unviable. Where development is demonstrated to be unviable, further negotiations will take place including consideration of the mix and type of social housing proposed, to test whether there is a better and more viable arrangement.</p>
MM115	166	H1	<p><i>Amend clause b and closing sentence and add clause f;</i></p> <p>b. Where an applicant advises that a proposal is unviable in the light of the above policy requirement, other policy requirements, specific site characteristics and other financial factors, an <u>independently assessed*</u> open book financial appraisal of the development should be provided by the applicant which will then be independently assessed at the expense of the applicant*</p> <p><u>f. Where the affordable housing policy would result in a requirement that more than half of an affordable home should be provided, the calculation will be rounded upwards and where it would be less than 0.5 a financial contribution of equivalent value may be sought.</u></p> <p>Further details regarding the implementation of this policy will be provided in the Affordable Housing <u>Supplementary Planning Document SPD</u></p>
MM116	167	5.18	<p><i>Amend;</i></p> <p>It is expected that rural exception sites will generally deliver 100% affordable housing. In some cases however, as recognised in paragraph 54 of the NPPF, some 'market housing' may be appropriate on sites where it can be demonstrated that the market housing is necessary to cross-subsidise the delivery of significant additional affordable</p>

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			housing within the scheme. On the basis of the NPPF text it is considered that 'some' cannot mean more than 50% of the houses within an exception site being market housing. In order for the Council to establish if market housing is required, and if so the quantity, the applicant will be expected to provide an <u>independently assessed</u> open book financial appraisal of the development. This will then be independently assessed at the expense of the developer to demonstrate the viability of the revised scheme.
MM117	169	5.19	<p><i>Add;</i></p> <p><u>Policy H3 applies this national policy. The definition of a rural worker is not limited to someone employed in agriculture or forestry. It can include, for example, those employed in equestrian or other rural-based enterprises, water-based businesses, etc. The policy makes this explicit. The definition does not apply to someone whose business or occupation is carried out in a wide locality in the rural area, for example a tradesperson who does not require fixed premises.</u></p>
MM118	169	5.20-5.49	<p><i>Delete and substitute;</i></p> <p><u>The need for a full-time worker</u></p> <p><u>The provision of a dwelling for occupational purposes in the countryside is an exception to normal planning policy. Consequently, the policy requires evidence clearly demonstrating that the scale and nature of an existing or intended enterprise is sufficient to require one or more full-time workers to live at or near to the place of work. The particular assessments applied can be different depending on whether the application is for a dwelling for an agricultural, forestry or other essential rural worker and whether the application is for temporary or permanent accommodation.</u></p> <p><u>Functional need for a temporary dwelling</u></p> <p><u>The policy allows for temporary dwellings because a new farming, forestry or rural-based enterprise (whether on a newly created agricultural unit or an established one) may not be able to demonstrate the need for a permanent dwelling. By definition, these take the form of a caravan or structure which can easily be dismantled as any temporary permission will be granted for a specified period. This period will usually be for no longer than three years, with conditions requiring removal at the end of the period.</u></p> <p><u>Functional need for a permanent dwelling</u></p> <p><u>The assessment of 'functional need' establishes whether the proposed dwelling is essential to enable one or more workers to be readily available at most times to ensure the proper functioning of the existing enterprise, provided that such a requirement cannot be reasonably dealt with by any other means. For agricultural workers such a requirement might</u></p>

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			<p><u>arise, for example, if workers are needed to be on hand day and night, such as in case animals or agricultural processes require essential care at short notice.</u></p> <p><u>Financial test for rural workers' dwellings</u> <u>Occupational accommodation cannot be justified on agricultural, forestry or business grounds unless the business enterprise is economically viable. A financial test is necessary to establish whether this is the case for both temporary and permanent dwellings. New temporary dwellings will only be justified if the new enterprise is realistically expected to be profitable within a determined period. To justify a new permanent dwelling as sustainable development, the rural business enterprise must be well established. Applying the financial test can also help to establish the size and design of the dwelling which the farming, forestry or rural business unit can sustain</u></p> <p><u>Occupancy and other conditions</u> <u>Where a dwelling for a farm, forestry or essential rural worker has been permitted, the council wishes to ensure that the dwelling is kept available for meeting this need for as long as it exists. Permitted development rights allow certain developments, such as extensions, within the curtilage of a dwelling house. These could result in an occupational dwelling increasing to a size either not justified by the identified functional requirement of the unit or becoming too expensive for any future potential occupier to buy or rent. The policy therefore makes provision for conditions and legal agreements to preserve the attributes of an occupational dwelling.</u></p> <p><u>Information and appraisals</u> <u>Applicants must provide sufficient information to enable the council to determine any application for an occupational dwelling or the removal of an occupancy condition. The council may also seek the advice of agricultural or other consultants to give a technical appraisal of the case being put forward.</u></p>
MM119 to MM147 not used			
MM148	173	H3	<p><i>Delete and substitute;</i></p> <p><u>Requirements for all rural workers' dwellings</u> <u>All new dwellings for an agricultural, forestry or rural worker will only be permitted if all of the following criteria are met:</u></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>a. <u>The need relates to a full-time worker (someone employed to work solely or mainly in the relevant occupation) and does not relate to a part-time requirement</u></p> <p>b. <u>There is a functional need for a worker to live at, or in the immediate vicinity of, their place of work (considering the requirements of the activities, operations and security of the enterprise and not personal preferences or circumstances). For a temporary dwelling, the need is essential to support a new rural business activity and for a permanent dwelling, there is an essential existing functional need. By itself, the protection of livestock from theft or injury by intruders does not establish need, nor do requirements arising from food processing or agricultural contracting, and nor does a retirement home for a former farmer. Conventional methods of forestry management are unlikely to give rise to an essential functional need.</u></p> <p>c. <u>The functional need could not be fulfilled by any other means. For example, applicants will need to demonstrate why agricultural, forestry or other essential rural workers could not live in nearby towns or villages, or make use of accommodation already existing on the farm, area of forestry or business unit. Where applicable, the council will take into account the Town and Country Planning (General Permitted Development)(England) Order 2015 Schedule 2 Part 3 Class Q for changes of use from agricultural buildings to dwellings.</u></p> <p>d. <u>It is sited so as to meet the identified functional need and is related to existing farm, forestry or rural business buildings, or other dwellings where these exist on or adjacent to the unit for which the functional need has been established.</u></p> <p>e. <u>Suitable accommodation has not been sold separately from the land within the last five years, including that which might have been converted.</u></p> <p><u>Temporary rural workers' dwellings</u></p> <p><u>The council will not normally give temporary permission in a location where a permanent dwelling would not be permitted. New temporary dwellings for an agricultural, forestry or rural worker will only be permitted if all of the following additional criteria are also met:</u></p> <p>f. <u>The future economic viability of the enterprise to which the proposed dwelling relates can be demonstrated by a sound business plan. This should demonstrate that the proposed enterprise has been planned on a sound financial basis with a reasonable prospect of delivering a sustainable profit before or by the expiry of the temporary period that the proposal seeks to secure.</u></p> <p>g. <u>it takes the form of a caravan, a wooden structure, or other temporary accommodation of the minimum size required to support the proposed new rural business activity.</u></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>The council will not normally grant extensions to a temporary permission over a period of more than three years. If permission for a permanent building is subsequently sought, the merits of the proposal will be assessed against the criteria in this policy relating to permanent occupational dwellings in the countryside.</p> <p><u>Permanent rural workers' dwellings</u></p> <p>New permanent dwellings for an agricultural, forestry or rural worker will only be permitted if all of the following additional criteria are also met:</p> <p>h. The economic viability of the enterprise to which the proposed dwelling relates can be demonstrated by satisfying the 'financial test' applied by the council. This should demonstrate that the enterprise to which the application relates:</p> <p> i) has been established for a continuous period of at least the previous three years and in the case of an enterprise consisting of more than one activity, those three years shall apply to the latest activity relating to the application</p> <p> ii). has been profitable (in a realistic sense, taking account of the nature of the enterprise) for at least one of those three years and</p> <p> iii). is financially sound on that date and has a clear prospect of remaining so</p> <p>i. Agricultural, forestry or other occupational dwellings should be commensurate in size to the established functional requirement. In determining the appropriate size of a dwelling, the council will consider the requirements of the enterprise rather than those of the owner or occupier. New dwellings must be of the minimum size and an appropriate design commensurate with the established functional requirement and reflective of the enterprise's financial projections unless robustly justified. The council will not permit dwellings that are:</p> <p> i). unusually large in relation to the agricultural, forestry or rural business needs of the unit, with net useable floor space not normally larger than 180 sqm for the initial dwelling and 120 sqm for each dwelling thereafter. This threshold excludes garaging but including associated offices such as a farm office. Or</p> <p> ii). unusually expensive to construct in relation to the income the unit can sustain in the long term.</p> <p>Permitted Development Rights may be removed in order to ensure that a dwelling is not subsequently extended to a size which exceeds its functional requirement.</p> <p><u>Occupancy conditions and removal of conditions</u></p> <p>Planning permission will be granted subject to a planning condition or S106 protecting its continued use by agricultural, forestry and other rural workers. An agricultural, forestry or rural worker occupancy condition will</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>only be lifted if it can be demonstrated that both of the following criteria are met:</p> <p>j. <u>A suitable sustained attempt has been made to advertise and market the dwelling for sale or rent without any unreasonable restriction and with amenity land proportionate to its size and at a price that reflects the occupancy restriction for a continuous period of at least 12 months or an appropriate period as agreed with the Local Planning Authority. This should be evidenced through relevant documents such as marketing and valuation reports, which have been independently assessed* before submission to the council</u></p> <p>k. <u>The rural worker dwelling no longer serves a need in connection with the holding to which it relates and there is no agricultural, forestry or rural worker occupational need elsewhere that it could reasonably service, nor is it likely that any such needs will arise in the foreseeable future.</u></p> <p><u>The council would not expect an occupational dwelling for an essential rural worker to be severed from the business unit to which it is tied, unless the business fails. In particular, the council would be unlikely to support any subsequent application to remove an occupational condition on such a severed dwelling or any future application for a new dwelling relating to the business. Even if the business to which the dwelling relates fails, the council would expect every reasonable effort to be made to retain the occupational dwelling. The council would apply the same principles as it would to a proposal to remove an agricultural or forestry condition.</u></p> <p><u>Proposals for the removal of an agricultural or forestry condition will be considered on the basis of an up-to-date assessment of the demand for farm or forestry dwellings in the locality and not just on the particular farm or forestry holding. When considering proposals to remove the occupancy condition for an essential rural worker, the council will need to be convinced that the dwelling is no longer needed for the continuing rural enterprise. Alternatively, in the event that the enterprise fails, it will need to be demonstrated that the dwelling is not needed for any proposed new use with planning permission or to meet a wider need in the locality for an occupational dwelling for an agricultural, forestry or essential rural worker.</u></p> <p><u>*the independent assessment should be by an assessor approved by the council.</u></p>
MM149	175	5.50	<p><i>Amend;</i></p> <p><u>In the countryside existing dwellings already form a part of the landscape and associations with other buildings and with infrastructure are already established. Therefore, outside the Green Belt, the replacement of existing dwellings with a similar dwelling will generally be acceptable. Whilst</u></p>

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			accepting the principle of the erection of replacement dwellings, it is important to take into account the overall effect of the proposed replacement <u>on its surroundings</u> . To <u>avoid harmful impacts</u> T the effects of the proposed replacement should be compared with the impact of the existing dwelling. If the dwelling <u>being</u> allowed exceeds the original size, the Council may impose a condition withdrawing future permitted development rights <u>to prevent further expansion harming the surrounding area</u> . For the purpose of the comparison the term 'dwelling' will not include any detached garaging or domestic outbuildings.
MM150	177	Preceding 5.54	<i>Insert new heading before existing heading Housing Mix;</i> <u>Meeting Accommodation Needs</u> <i>And insert new paragraph;</i> <u>Developers are expected to provide housing solutions that contribute to meeting the housing needs of the housing market area, as identified in the latest Housing and Employment Development Needs Assessment (HEDNA) and in any other appropriate local evidence. This means new residential development should maintain, provide or contribute to a mix of housing tenures, types and sizes to help support the creation of mixed, balanced and inclusive communities.</u>
MM151	177	5.54	<i>Add;</i> <u>The housing mix will be agreed taking into account the council's most up-to-date evidence on housing need and any evidence available regarding local market conditions. It is imperative to recognise that an appropriate housing mix will vary between urban and rural locations for example, large scale flatted development are not generally provided on small sites in villages.</u>
MM152	177	Following 5.56	<i>Move first paragraph of policy H6 and amend to become policy H6a;</i> H6a Housing Mix <u>New residential development should will be expected to provide a mix of housing types and sizes homes to meet current and <u>expected future housing needs</u> requirements in the interests of meeting housing need and creating socially mixed and inclusive communities.</u> The mix of housing will be agreed negotiated having regard to taking into account the Council's most up to date evidence on housing need, <u>available and any evidence from developers on available</u> regarding local market conditions and shall be in general conformity with the council's latest evidence* and Neighbourhood Development Plan evidence where applicable for the relevant area. <i>Asterixed footnote to read; At the time of adoption the latest evidence is in the Buckinghamshire HEDNA update Dec 2016 but this will be subject to monitoring and review. This will be updated periodically.</i>

Ref	Page	Policy/ Paragraph	Main Modification
MM153	177	5.57	<p><i>Amend;</i></p> <p>As set out in at paragraph 50 of the NPPF (2012), plans <u>local planning authorities should plan</u> aim for a mix of housing to meet the needs of different groups in the community - including the elderly (paragraph 50) <u>older people</u>. The Demographic projections in the HEDNA's housing needs assessment show that the population of Buckinghamshire is likely to increase by between 64,700 and 73,700 people over the 20-year period 2013 -2033. The number of people aged 75 or over is projected to increase by around 35,000 <u>32,100</u>, approximately around half of the total projected growth. It follows that there is likely to be a significant need for housing which will be able to meet the needs of older people. Those that do move home are therefore likely to need accessible housing that can meet the needs of older people. Specialist provision for older people is split into the following categories:-</p> <ul style="list-style-type: none"> mainstream (including adapted and wheelchair homes) specialised housing (including extra care and sheltered housing) care homes (including both registered nursing and registered care homes)
MM154	178	5.58	<p><i>Amend;</i></p> <p>The <u>Buckinghamshire HEDNA Update 2016</u> identifies the following demand for housing for older people <u>in Aylesbury Vale</u>:</p> <p><i>Amend first line, second column of table;</i></p> <p>+13,978 <u>+12,727</u></p> <p><i>Amend third column of table;</i></p> <p>420 <u>380</u></p> <p>210 <u>190</u></p> <p>140 <u>130</u></p> <p>140 <u>130</u></p> <p>80</p> <p>1,680 <u>1,530</u></p> <p>2,670 <u>2,440</u></p> <p>12.5% <u>12.6%</u></p>
MM155	178	5.59	<p><i>Amend;</i></p> <p>It is important to note that The objectively assessed housing need (OAN) for the district's <u>older people set out in the table above</u> does not include the projected increase of the <u>75+ institutional population in Aylesbury Vale (which includes</u> older people in residential care homes and nursing homes (Use Class C2)). For the district, it is projected in the HEDNA that the institutional Class C2 population aged 75+ will increase by <u>1,160 1,020 people over the plan period.</u></p>

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			<u>Housing need for older people will therefore need to be met through a mixture of normal housing (Use Class C3) and institutional provision (Use Class C3).</u>
MM156	178	5.60	<p><i>Amend;</i></p> <p><u>Buckinghamshire County Council (BCC) has prepared a several documents: 'Housing for Older Citizens in Buckinghamshire'; 'Market Position Statement for Specialised Housing' Update and Recommendations report – December 2016 Housing; and the Learning Improvement Network (LIN) 'Older and Vulnerable Adults Housing' report. These indicate a significant need for accommodation for older people on the basis of population forecasts. This sets out how housing for older people should be delivered, but will need to be interpreted to ensure that its provisions meet the content of the HEDNA. We will continue working with BCC as this document and their strategy evolve, to ensure that the Plan reflects their expectations and objectives.</u></p>
MM157	178	5.61	<p><i>Delete and substitute;</i></p> <p><u>In order to properly assess the need for residential care for older people it is important to differentiate between C2 (residential institutions) and C3 (residential dwelling house) provision for older people. Table 14 provides an analysis of the generic types of residential care and services offered, and the typical use class each type falls under. The types of accommodation identified in Table 14 are mostly provided through the private sector. However, services may be commissioned through Buckinghamshire County Council Health and Adult Social Care Services to provide an element of C2 care. AVDC will secure allocations for residential care to meet the forecast C2 demand.</u></p>
MM158	178	To follow 5.61	<p><i>Insert;</i></p> <p><u>Recent appeal decisions, both locally and nationally, have found that some of the categories defined as C3 housing in the HEDNA should instead be identified as C2 institutional uses, based on an analysis of the care available/provided and levels of self-containment. On that basis, AVDC considers that some of the Use Class C3 or normal housing provision for the older people identified in the HEDNA should instead be included within the requirement for Use Class C2 or institutional accommodation for older people. These fall under the Extra Care (570), Sheltered 'plus'/enhanced sheltered (260) and Dementia (80) categories listed in the HEDNA table included above, and totals 910 units. This figure must be added to the overall projected aged 75+ institutional population increase demand for older people accommodation of 1,020 units. The resultant overall requirement for C2 older people provision therefore equates to 1,930 units need over the plan period (2013-2033).</u></p> <p><u>The remaining category in the HEDNA table is Leasehold Schemes for the Elderly (LSE), which totals 1,530 units. LSE</u></p>

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			<p>units are still regarded as Use Class C3 housing given their lack of obligatory care packages or communal facilities. Such housing is normally provided by Registered Providers (RPs) and is another category of intermediate affordable housing beyond that addressed by policy H1. The LSE classification is now referred to as Older Persons Shared Ownership (OPSO) housing.</p> <p>In order to satisfy the HEDNA requirement for OPSO/LSE housing, RPs will be able to apply for funding to deliver these schemes through the Homes England Shared Ownership and Affordable Housing Programme 2016-2021. Individuals are also able to directly access OPSO housing through the Help to Buy initiative. The Help to Buy initiative sets out the eligibility criteria for applying for an OPSO scheme. The eligibility criteria will apply to occupants/owners of OPSO housing and provides, amongst other criteria that applicants must have a maximum annual household income threshold of £80,000 and be aged over 55. Under the OPSO scheme, the maximum equity share which can be owned is 75% of the value of the home. Once this percentage has been reached, the remaining 25% of the equity share remains with the equity loan holders.</p> <p>In order to identify the remaining need for C2 provision, an assessment of previous C2 commitments and completions was undertaken from the start of the plan period in 2013 up to the housing supply base-date in VALP of 31 March 2020. This figure currently stands at 718 units completed or committed since 2013. The remaining need of 1,212 units constitutes the local plan requirement of 1,212 units of C2 accommodation for older people which needs to be identified for the rest of the plan period (2020-2033).</p> <p>Although paragraph 47 of the NPPF 2012 applies to housing growth, AVDC considers it best practise that C2 provision for older people should be made for a supply of specific, developable sites or broad locations for growth for years 1-5 of the remaining plan period (2020-2025). Dividing the overall remaining local plan C2 older person's requirement of 1,212 units by the remaining plan period of 13 years gives a per annum figure of 93 units. This equates to 465 units over years 1-5 needing to be allocated on specific developable sites. For the remaining 8 years of the plan period, years 6-13, AVDC considers it prudent to identify specific, developable sites where it is possible so that the remaining C2 requirement of 747 houses can be delivered. If this is not possible, it is considered acceptable to identify broad locations where portions of the remaining 747 units of C2 older person's provision can be accommodated. Some of the C2 requirement may be met by mixed C2 and C3 schemes.</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><u>To aid in the categorisation of planning applications for older person's accommodation the following table provides an illustration of the types of accommodation for older people and the services they provide. The definitions in Table 14 have been accepted at previous examinations in public and recognised as industry standard definitions within the Housing Learning and Improvement Network (LIN).</u></p> <p><i>Insert new table 14 here (appended at end of list of modifications)</i></p> <p><u>To allocate the 465 units needed to meet the C2 older persons' units requirement for 2020 – 2025, an assessment of suitable housing and employment HELAA sites was undertaken. A conservative estimation of developable area, density and site capacity was applied based on previous commitments and completions for C2 developments. Allowances were made for amenity space as well as other non-residential land use. To determine the broad capacity for each site, the assessment utilised two density categories – urban and less urban. 70 uph (units per hectare) was identified as an appropriate density for sites that have a less urban and more suburban or edge of settlement characteristic, and 100 uph was identified as appropriate for sites that are in an urban setting, where a higher density would be more suitable. Sites subsequently allocated for C2 use following this assessment process are listed in part a. of policy H6b. Currently, allocations fall short of the target by 51 units but it is expected that planning permissions will quickly resolve this shortfall.</u></p> <p><u>In order to show how the remaining 747 C2 older persons' units requirement for 2025 - 2033 will be delivered, broad locations for growth have been identified in policy H6 b. Areas identified have been assessed as having the basic capacity to support C2 development for older persons. However, there is currently insufficient technical evidence and/or supporting infrastructure to make specific allocations. In addition, the provisions made in E1 Protection of key employment sites give sufficient flexibility for uses other than B1, B2 or E – including C2. Policy E2 Other employment sites also contains sufficient flexibility in its provisions for the redevelopment/reuse of sites outside key employment areas.</u></p> <p><u>The allocation for the development of Winslow Centre (WIN026) is an expansion of a scheme allocated in the Winslow Neighbourhood Plan that proposed to deliver 30 C2 units for older people which will now deliver 83 units of C2 accommodation for older people. The expanded scheme intrudes into an allocated area of Local Green Space which protects recreation facilities, however, those facilities are to be replaced by a new sports hub near to Winslow station.</u></p>

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			<p><u>The review of the Local Green Space allocation and the allocation of the sports hub will be addressed by the proposed review of the Winslow Neighbourhood Plan.</u></p> <p><u>The allocation at Fremantle Court is adjacent to an existing facility to the south of Stoke Mandeville. Its development will create a very large facility which is larger than normally considered to be suitable and it is some distance away from the village. However, there were no other more suitable sites proposed to the council and a number of mitigation measures will be put in place. They include, sustainable transport measures, such as a car club and an electric minibus, Passivhaus design standards and a 6.9 ha nature reserve.</u></p>
MM159	179	H6	<p><i>Delete second and third paragraphs of policy H6 and substitute new policy H6b to follow new text following paragraph 5.61;</i></p> <p><u>H6b Housing for older people</u></p> <p><i>Insert new policy H6b here (appended at end of list of modifications)</i></p>
MM160 to MM167 not used			
MM168	178	5.63	<p><i>Add;</i></p> <p><u>It recommends that all dwellings should be built to at least category 2 standards and that 10% of general housing and 15% of affordable housing should be built to category 3 standards. The reasons for this are set out below. However it is currently Government guidance that wheelchair accessible (category 3) homes should only be applied to dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling so local plan policies should not require market housing to be wheelchair accessible. Moreover Government guidance advises that category 2 and 3 dwellings (which require step free access) should not apply to developments (in particular low-rise flatted developments) if it is not viable to do so.</u></p>
MM169	179	5.64 and 5.65	<p><i>Transpose paragraphs 5.64 and 5.65 and add new paragraph;</i></p> <p><u>Evidence for the proportion of wheelchair-using households compared with the overall household population is not available below the national level as the information is not collected in the Census however, AVDC Housing are bringing forward properties where they have been adapted to meet the needs for the mobility impaired including wheelchair users when there is knowledge of local need .AVDC Housing also facilitate a high number of retrospective adaptations using Disabled Facilities Grant monies, part of which is</u></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<u>advance funded in a lump sum using Vale of Aylesbury Housing Trust as the largest provider. The number of claimants where someone within the household (claimant, partner, dependant, non-dependant, boarder/sub-tenant) is in receipt of DLA or PIP stands at 1,168 and this demand continues.</u>
MM170	179	H6	<p><i>Delete fourth paragraph of policy H6 and substitute;</i></p> <p>H6c Accessibility</p> <p><u>All development will be required to meet and maintain high standards of accessibility so all users can use them safely and easily. Development will need to meet at least category 2 accessible and adaptable dwellings standards unless it is unviable to do so which will need to be demonstrated by the applicant and independently assessed. A minimum of 15% of affordable Housing provided on housing sites will be required to be nominated by the LPA for M4(3) wheelchair accessible housing (dependant on the suitability of the site to accommodate wheelchair users and its proximity to services and facilities and public transport) unless it is unviable to do so which will need to be demonstrated by the applicant and independently assessed.</u></p> <p><u>In such cases wheelchair accessible housing means a dwelling which meets the requirements contained in Part M4(3)(1)(a) and (b) and Part M4(3)(2)(b) for wheelchair accessible dwellings as contained in Category 3 – wheelchair user dwellings of Schedule 1 of the Building Regulations 2010 as amended.</u></p> <p><u>This policy will continue to apply to the nearest equivalent standards in any future modification to the above Building Regulations Approved Documents.</u></p>
MM171	180	5.66 to 5.69 and H7	<i>Delete policy and supporting paragraphs</i>
MM172 and MM173 not used			
MM174	182	6.1	<p><i>Amend fourth sentence;</i></p> <p>For the avoidance of doubt, this section relates to land uses that fall within the B <u>and E</u> classes of the Use Classes Order: B1a/b <u>appropriate uses within class E</u> (offices), B1c/B2 (general industrial) and B8 (storage/distribution). <u>Appropriate uses within class E do not include main town centre uses.</u></p>
MM175	182	6.6	<p><i>Amend second sentence;</i> This included both B1 <u>(now superseded by class E)</u>/B2/B8 sites and other employment sites.</p> <p><i>Amend third sentences to substitute <u>appropriate class E</u> for</i></p>

Ref	Page	Policy/ Paragraph	Main Modification
			B1
MM176	183	E1	<p><i>Amend title and first sentences of clauses a, b and c;</i></p> <p>E1 Protection of key employment sites <u>and enterprise zones</u></p> <ol style="list-style-type: none"> Within key employment sites (listed above and identified on the Policies Map) applications for <u>B1 appropriate class E</u> (light industrial), B2 (general industrial, B8 (storage and distribution will be permitted. The use of key employment sites for employment purposes other than <u>appropriate class E</u> B1, B2 and B8 may be appropriate, if it can be proven that the use provides on-site support facilities, or demonstrates similar economic enhancement to <u>appropriate class E</u> B1/B2/B8 uses. Main town centre uses <u>that do not fall within appropriate parts of use class E, or other uses that do not fall within use classes B2 or B8</u> will not be supported, except as an ancillary facilities to service a key employment site.
MM177	184	6.8	<p><i>Amend;</i></p> <p>Where there is no reasonable prospect of an employment site being used for employment purposes, alternative uses may be considered. Where an application is made for an alternative use other than employment, the following information will be sought <u>to determine whether there are any reasons why the site is unsuitable for an employment use, if there are any other suitable sites in the vicinity and whether the site has been suitably marketed:-</u></p> <ul style="list-style-type: none"> • a description of any problems caused by the employment use, together with any evidence, the measures considered to try and mitigate these issues, and an explanation of why these problems could not be overcome • any other reasons why the site is thought unsuitable for employment uses <p>details of how the property has been marketed, including for sale or rent, over what period and for what price (and how the asking price was calculated), what use(s) it was marketed for, where it was advertised, and whether there have been any offers received, and</p> <ul style="list-style-type: none"> • what other suitable, viable, alternative sites are available locally for employment uses, (this should include an assessment of existing sites and premises, in addition to land allocated by the Local Plan and where appropriate neighbourhood plans).
MM178	185	E2	<p><i>Amend;</i></p> <p>Outside key employment sites, the redevelopment and/or reuse of employment sites to an alternative <u>non-employment</u> use will normally be permitted provided all of the following</p>

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			<p>criteria apply:</p> <p>a. Where it <u>The development</u> will not prejudice the efficient and effective use of the remainder of the employment area</p> <p>b. <u>Any existing appropriate class E, B2 and B8 businesses affected by the loss of employment land will be relocated to alternative premises so viable businesses are not affected</u></p> <p>c. The site has been marketed as an employment site for an employment use suitable to the site and location at a suitable price, by appropriate means for at least two years with no viable interest, and</p> <p>d. There is a substantial over-supply of suitable alternative employment sites in the local area, and</p> <p>e. <u>There are specific issues with the continued use of the site for employment which cannot be mitigated sufficiently.</u></p>
MM179	186	6.12	<p><i>Amend first sentence;</i></p> <p>In existing employment areas, change of use of existing premises will be considered for <u>to</u> complementary facilities provided these are <u>need to be</u> suitably located and would not compromise surrounding employment uses.</p>
MM180	186	6.13	<p><i>Amend first sentence;</i></p> <p>In all cases, the only facilities <u>need to be</u> of an appropriate nature and scale to meet the needs of employees will be permitted.</p>
MM181	188	6.15, 6.16 and 6.17	<i>Delete paragraphs</i>
MM182 not used			
MM183	188	6.19	<p><i>Amend;</i></p> <p>Aylesbury Vale Retail Impact Thresholds report recommends that the Plan sets a local floor space threshold of 400 sqm (gross) above which an impact assessment will be required to accompany retail proposals outside town centres. The <u>2017 Aylesbury Vale Retail Impact Thresholds report recommends that a 400sqm district-wide floorspace threshold should be set, above which an impact assessment will be required to accompany retail proposals outside town centres. However in August 2018, GL Hearn produced a supplement to the 2017 Aylesbury Vale Retail Impact Thresholds report, which recommended retaining the 400 sqm local floorspace threshold for the district, but with the addition of a separate local floorspace threshold of 1,500sqm for Aylesbury. For other main town centre uses the national</u> threshold <u>threshold</u> will apply. The impact assessment should comply with NPPF(2012) requirements in paragraph 26 by considering the impact of proposals on existing and planned investment in a town centre and the impact on town centre vitality and viability. The Council will expect any impact assessment to be proportionate to the scale and</p>

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			nature of the proposal and expected impact and will work proactively with applicants when scoping and agreeing the level of supporting retail information required.
MM184	188	6.20	<i>Delete paragraph</i>
MM185	189	E5	<p><i>Amend;</i></p> <p>A sequential test will be applied to planning applications <u>Proposals for main town centre uses that do not comprise small scale rural development and are not in an existing centre, within defined town centres⁴ will undergo the following sequential test: Main T+own centre uses should primarily be located within defined town centres. If no suitable sites are available within defined town centres, main town centre uses should be located in town centres, then edge of defined town centre locations. Only when no suitable sites are not available in edge of defined town centre locations will out of town centre sites be considered. In terms of</u> <u>When considering edge of centre and out of town centre proposals, preference will should be given to accessible sites that are well connected to the town centre. Proposals outside defined In assessing suitability, factors such as viability, town centre vitality and availability should be considered.</u></p> <p><u>In addition to the above sequential test, pProposals for non-food retail and food-retailing leisure, including extensions, on sites not allocated in plans and located outside defined town centres will be granted if the proposal would not have a significant adverse impact on the vitality and viability of the defined town centres, either as an individual development or cumulatively with similar existing or proposed developments. An impact assessment submitted with the application if the proposal is likely only to affect the Aylesbury town centre and if the proposal is 1,500 square metres or more, or, if the proposal is likely to affect any other defined town centre, and the proposal is 400 square metres or more will assist the council in making this assessment.</u></p> <p>a. The proposal does not have a significant adverse impact on the vitality and viability of the defined town centres, either as an individual development or cumulatively with similar existing or proposed developments;</p> <p>b. The proposed retail development on out-of-centre sites will need to demonstrate that no suitable site can be found, firstly within the existing town or local centre or, secondly, on the edge of the centre. Any assessment of suitability should consider factors such as viability and availability</p> <p>c. Proposals over the floor space threshold of 400 sqm are accompanied by a full assessment of the potential impact on town centres and nearby centres</p> <p>d. Proposals less than the above floor space threshold are</p>

⁴ As defined in the Glossary

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			<p>accompanied by a retail assessment report if appropriate</p> <p>e. The type of goods sold and the form of shopping unit proposed could not be conveniently accommodated within the existing shopping centre, or where suitable sites and premises are not available, within the centre or edge-of-centre sites</p> <p>f. The type of goods sold and the facilities provided complement those provided in the existing retail centre</p> <p>g. Servicing and customer traffic can be safely and conveniently accommodated by the surrounding road network and does not add to traffic generation in the town centre</p> <p>h. The proposal is easily accessible by the highway network and public transport and includes provision for access by cycle and on foot, and</p> <p>i. The design of the buildings will not detract from the character or appearance of the site and/or surrounding area.</p>
MM186	190	6.22	<i>Delete final sentence.</i>
MM187	190	6.23	<i>Delete final sentence.</i>
MM187A	190	To follow 6.24	<p><i>Insert new heading and following three paragraphs;</i></p> <p><u>Use class E and main town centre uses</u></p> <p><u>The NPPF (2012) sets out that town centres are areas that are predominantly occupied by main town centre uses. Main town centre uses are defined to include the following: retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).</u></p> <p><u>Amendments to the Town and Country Planning (Use Classes) Order 1987 (as amended) ("the Use Classes Order") were made on 1 September 2020. These amendments revoked the previously existing Use Classes A1 (shops), A2 (financial and professional services), A3 (restaurants and cafés), B1 (business), D1 (non-residential institutions) and D2 (assembly and leisure), and replaced them (either partially or wholly) with a new Class E (commercial, business and service).</u></p> <p><u>There is overlap between uses in Class E and main town centre uses. The following uses within Class E are considered to constitute main town centre uses: E(a), E(b), E(e) and</u></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><u>E(g)(i). The following uses within Class E may be considered main town centre uses depending on the specifics of the use: E(c)(iii) and E(d). Uses that fall within E(c)(i), E(c)(ii), E(f), E(g)(ii) and E(g)(iii) are not considered main town centre uses.</u></p>
MM188	190	E6	<p><i>Amend first section;</i></p> <p><u>Development Within primary shopping frontages</u></p> <p>Within the primary shopping frontages in the town centres (as shown on the Policies Map)^[1] at ground floor level, only A1, A2 and A3 uses will be permitted. A2 and A3 uses will be permitted where they adjoin an A1 use, <u>E(a), E(b), E(c) uses will be permitted</u> subject to achieving a good mix of retail uses overall, provided the proposal:</p> <p>a. Either cumulatively or individually is considered to contribute positively to the vitality and viability of the area ±. <u>This should take account of the mix of uses in the primary frontage, what is there currently and what development is committed, location, prominence and length of frontage of the premises, nature of the use proposed, including the level of pedestrian activity associated with it, and the number of ground floor vacancies in the area, and</u></p> <p>b. would not result in the loss of an A1 <u>E(a)</u> use on a visually prominent site.</p> <p>Consideration will be given to the size of the shop unit, the width of the shop frontage and surrounding uses. <u>A window and entrance should be provided or retained which relates well to the design of the building and to the street scene and its setting. Regard should be given to the Aylesbury Vale Shop Front Design Guide SPD in the design of business and shop frontages.</u></p> <p>Residential development will be encouraged within the primary shopping frontage above ground floor level.</p> <p>*This should take account of the mix of uses in the primary frontage, what is there currently and what development is committed, location, prominence and length of frontage of the premises, nature of the use proposed, including the level of pedestrian activity associated with it, and the number of ground floor vacancies in the area.</p> <p><i>Amend section headed Secondary shopping frontages;</i></p> <p><u>Development Within secondary shopping frontages</u></p> <p>Within defined secondary shopping frontages, (as shown on the Policies Map), the development, improvement or expansion of retail and appropriate non-retail uses and/or change of use of retail premises to appropriate non-retail uses <u>Proposals for E(a), E(b), E(c), or any main town centre uses within defined secondary shopping frontages (as shown</u></p>

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			<p>on the Policies Map^[2] will be permitted provided the proposal: c. Either cumulatively or individually, is considered to contribute positively to the vitality and viability of the area *. <u>This should take account of the mix of uses in the secondary frontage, what is there currently and what development is committed, location, prominence and length of frontage of the premises, nature of the use proposed, including the level of pedestrian activity associated with it, and the number of ground floor vacancies in the area</u></p> <p>d. would not result in more than three non-A1 E(a) uses in a row, <u>and</u></p> <p>e. would not result in the loss of an A1 E(a) use on a visually prominent site.</p> <p>A window and entrance should be provided or retained which relates well to the design of the building and to the street scene and its setting. Regard should be given to <u>the Aylesbury Vale Design SPD Aylesbury Vale Shop Front Design Guide</u> in the design of business and shop frontages.</p> <p>Residential development will be encouraged within the secondary shopping frontage above ground floor level.</p> <p>*This should take account of the mix of uses in the secondary frontage, what is there currently and what development is committed, location, prominence and length of frontage of the premises, nature of the use proposed, including the level of pedestrian activity associated with it, and the number of ground floor vacancies in the area.</p> <p><i>Add new section;</i></p> <p><u>Development within Primary Shopping Area outside Primary and Secondary frontages</u></p> <p><u>Proposals for E(a) uses which are outside the defined Primary and Secondary Shopping Frontages but within the Primary Shopping Area will be supported.</u></p> <p><u>Proposals for non-E(a) main town centre uses outside the defined Primary and Secondary Shopping Frontages but within the Primary Shopping Area will be supported if:</u></p> <p><u>f. The proposal would complement the existing uses within the Primary Shopping Area, and</u></p> <p><u>g. The proposal would contribute positively to the vitality and viability of the Primary Shopping Area, and</u></p> <p><u>h. The proposal would maintain the attractiveness and interest of the street scene.</u></p> <p><u>Proposals for non-main town centre uses which are outside the defined primary and secondary shopping frontages within the Primary Shopping Area will be supported if the above listed criteria are fulfilled and the proposal would not cause undue concentration of non-main town centre uses within the Primary Shopping Area, or would be located above ground floor level.</u></p>

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			<p><i>Insert footnotes;</i></p> <p><u>[1] Buckingham Neighbourhood Development Plan (2015) defines these for Buckingham</u></p> <p><u>[2] Buckingham Neighbourhood Development Plan defines these for Buckingham</u></p>
MM189	192	6.27	<p><i>Add to first sentence;</i></p> <p>Applications for tourism and leisure development in the countryside will need to be justified by the applicant <u>to show that it meets demand.</u></p> <p><i>Delete second sentence</i></p>
MM190	192	E7	<p><i>Amend;</i></p> <p>The Council will promote a growing, sustainable tourism sector, and <u>will</u> support proposals. Proposals for new or expanded tourism, visitor or leisure facilities <u>other than accommodation</u> will be supported within or adjacent to settlements.</p> <p>Elsewhere, the nature of the proposed development must justify a countryside location and minimise environmental impacts, and avoid unacceptable traffic impact on the local road network. Development proposals will be supported where they meet all the following criteria: proposed development must:</p> <p><i>Delete criteria a-e and substitute</i></p> <p><u>a. involve the conversion or replacement of buildings which form part of an existing tourist facility or well-designed new building(s) which promotes diversification of agricultural and other land-based rural businesses.</u></p> <p><u>b. justify a countryside location and minimise environmental impacts, and</u></p> <p><u>c. demonstrate that the need is not met by existing provision within nearby settlements.</u></p> <p><u>In all cases such development must:</u></p> <p><u>d. respect the character and appearance of the location, and</u></p> <p><u>e. avoid unacceptable traffic impact on the local road network.</u></p> <p><u>f. In the case of seasonal structures these must be temporary in nature and not have an adverse impact on the landscape.</u></p> <p><u>g. Demonstrate that their benefits outweigh the harm.</u></p> <p><u>The Council will require a marketing strategy and business plan to be submitted to explain how the development will achieve a high-quality tourism product that meets demand.</u></p>
MM191	193	6.31	<i>Delete second bullet point</i>
MM192	193	6.34	<p><i>Amend;</i></p> <p>It would also be unduly restrictive to limit the development</p>

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			<p>of existing accommodation in the countryside. In order to support existing businesses therefore, the expansion of built tourist accommodation and sites will be allowed where this in a way that will improves the quality of the accommodation on offer and the appearance of the site, provided that as long as there is no significant harm and development would be consistent with the other policies of this Plan to the surrounding area, may be allowed subject to the details of a proposal.</p>
MM193	193	6.35	<p><i>Amend;</i></p> <p>The information required in support of applications is likely to vary greatly depending on the nature of the proposal, its scale and location. Proposals for accommodation in less accessible locations should normally include <u>more</u> information on <u>things like</u> the long-term viability of the enterprise, a clear justification of why such a less accessible location is needed, and <u>what</u> the benefits to the local <u>area might be</u> economy. As a town centre use, hotels should also comply with Policy E2. Where the impact of a new out-of-centre hotel would undermine the viability and contribution of more central hotels, or prejudice the potential to secure further hotel development on a more central site, development should be refused.</p>
MM194	193	6.36	<p><i>Amend;</i></p> <p>Tourist accommodation <u>like hotels and guest houses</u> provides <u>a</u> critical support to tourist attractions and facilities and contributes to the economy through its support of retail, food and drink and travel services. It is therefore important to ensure that the loss of <u>accommodation</u> stock is carefully considered, particularly with regard to the hotels and larger guesthouses in the area <u>due to the potential impact of a loss</u>. As a guide this means those that have at least six guest bedrooms. However it is also important to recognise that changes in the market will mean that some types of built tourist accommodation may become less attractive to visitors. If the offer cannot be improved, <u>then</u> falling profits would <u>probably</u> result in poorly maintained and ultimately failing accommodation, neither of which is a desirable outcome. A <u>Therefore the council will take a flexible approach</u> will be needed in assessing to what extent the loss of such facilities should be resisted. Applicants will be required to demonstrate that real effort has been made to retain the tourist accommodation <u>in accord with the requirements of the policy</u>. Evidence submitted should typically include</p> <ul style="list-style-type: none"> • reasons why there is no longer a market for the premises in its tourist function • details of how the property has been marketed, the length of time that the marketing was active and any changes during this period, the sale asking price, the level of interest

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			<p>generated and any offers received</p> <p>• in the case of a reduction in size, the economic impact on the ongoing viability of the business.</p>
MM195	194	6.37	<p><i>Amend;</i></p> <p><u>The council is also concerned that viability of existing provision could be detrimentally affected by the provision of more accommodation than an area needs. As a result if Should the district should ever reach the situation where there is no need for further tourist accommodation, either overall or in a more specific location, an application for new or expanded tourist accommodation will require a the submission of viability study evidence.</u></p>
MM196	194	6.38	<p><i>Amend;</i></p> <p>Proposals <u>As there are similar factors to take into account as for permanent tourist accommodation it will be important for both static and touring caravan sites as well as those for chalets and camping will to be judged against the criterion specified in Policy E8. In certain circumstances restrictions will be applied through the imposition of planning conditions, to avoid the continual residential use of a site and the potential negative impacts that would have, restrictions will be applied through the imposition of planning conditions.</u></p> <p>This reflects the need to preserve the supply of visitor accommodation in order to respond to demand, and equally that such sites may not be in a location considered sustainable for occupation as primary residences. Similarly, conditions may also be imposed to restrict seasonal occupancy of sites where considered necessary to safeguard landscape character through, for example, the winter months.</p>
MM197	194	6.39	<p><i>Amend;</i></p> <p><u>In addition to the need to obtain planning permission it should be noted that, caravan, camping and chalet operators must obtain a site licence. The site licence, issued by Environmental Health, covers such matters as the number and standard of spacing of the caravans, and hygiene.</u></p>
MM198	194	E8	<p><i>Amend third paragraph;</i></p> <p><u>Proposals that would result in the permanent loss or reduction in size of tourist accommodation with at least 6 bedrooms will be resisted unless it can be demonstrated that their tourist function is no longer viable and the site has been marketed for a minimum period of 12 months at a price commensurate with its use with details of levels of interest and offers received, that there is no longer a market for the premises in its tourist function and, in the case of a reduction in size, that the ongoing business will remain viable.</u></p> <p><i>After fourth paragraph, add;</i></p> <p><u>Proposals for hotels will be subject to the following considerations:</u></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>m. As a town centre use, hotels should also comply with <u>Policy E5</u></p> <p>n. In a situation where the impact of a new out-of-centre hotel would undermine the viability and contribution of more central hotels, or prejudice the potential to secure further hotel development on a more central site, it may be appropriate to refuse the application to protect the role of the town centre in accord with Government policy.</p> <p><i>Amend final paragraph;</i></p> <p>In granting permission, the Council council will impose conditions to control the use and occupation of holiday tourist accommodation. This includes situations where built tourist accommodation is permitted in a location where open market housing would normally be refused, therefore the council will restrict its occupation to ensure it remains in use as tourist accommodation.</p>
MM199	196	6.40	<p><i>Amend third sentence;</i></p> <p>New agricultural buildings (up to 465 <u>1,000</u> sqm) can be allowed under the provisions of the Town and Country Planning (General Permitted development) Order 1995 (as amended).</p>
MM200	196	6.41	<p><i>Amend;</i></p> <p>In cases where the Council considers the building too large in relation to the holding, the Council may require evidence to support the need for the building <u>could include</u>, such as stocking rates and storage requirements.</p>
MM201	196	E9	<p><i>Amend clause f;</i></p> <p>f. Sited close to existing buildings and designed in order to minimise adverse impact on the <u>openness of the countryside</u>, landscape character, residential amenity and reflect the operational requirements of the holding. <u>Where the Council considers the building too large in relation to the holding, the Council may require evidence to support the need for the building.</u></p>
MM202	201	7.5	<p><i>Amend;</i></p> <p>In early 2016 Buckinghamshire County Council (BCC) commissioned AECOM to develop a transport strategy for Aylesbury in order to support and accommodate future planned growth and the upcoming release of the Plan. This is known as the Aylesbury Transport Strategy (ATS), which will be a plan for transport in Aylesbury, setting, <u>sets</u> out the improvements needed to support the planned growth of the town between 2016 - 2033. The VALP identifies Aylesbury as playing a substantial and critical role in delivering growth for the district and the rest of Buckinghamshire. The town has been awarded Government backing as a Garden Town and will be a focus for developing the ATS and prioritising investment in multi-modal transport infrastructure. The strategy is also intended to address <u>addresses</u> current issues on the transport network and therefore represents the</p>

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			opportunity for a single coordinated approach to planning improvements and upgrades to the transport network and will form a key transport policy document for both BCC and AVDC. The focus of the strategy is Aylesbury town centre and its immediate urban area, however the growth and travel patterns were considered in a much wider context, including most of the Aylesbury Vale area. A list of mitigation schemes can be found in the Aylesbury Transport Strategy which is on the Council's website.
MM203	202	7.6	<p><i>Amend;</i></p> <p>The ATS will be used to justify the <u>Transport measures and interventions contained in the ATS are required to facilitate growth in the Aylesbury Garden Town. The key measures and interventions are set out in Policy [T3] below and supported by the Infrastructure Delivery Plan. The proposed</u> growth will be planned in a way which minimises the need to travel by private car, with more and more people choosing to walk, cycle or use public transport. Traffic growth will be managed to control congestion and provide opportunities to significantly maximise infrastructure improvements including:</p> <ul style="list-style-type: none"> • increased public transport, building on the success of the Aylesbury Rainbow bus routes • increased walking and cycling facilities, building on the success of the Aylesbury Gemstone cycleways • improving road infrastructure linking new developments to the town, which will create a series of link roads around the town • enhancements to the regional rail infrastructure linking us to neighbouring growth areas
MM204	202	7.8	<p><i>Amend;</i></p> <p>The growth aspirations in the Plan VALP are likely to have an impact on transport requirements in Buckingham; any and may therefore necessitate a number of improvements in/around the town. The aim of the Buckingham Transport Strategy (BTS) is to consider these growth aspirations holistically and propose measures that address their impacts as a whole, rather than the impact of each individual development <u>and support schemes contained in VALP.</u></p>
MM205	202	7.10	<p><i>Delete and substitute;</i></p> <p><u>The BTS has been used as one of a series of evidence documents to support the infrastructure identified in VALP under Policy T3.</u></p>
MM206	203	T1	<p><i>Amend;</i></p> <p>Development proposals should be consistent with and contribute to the implementation of the transport policies and objectives set out in the Buckinghamshire Local Transport Plan 4 (LTP). The Council, Buckinghamshire County Council and, where appropriate, Highways England, will work together to achieve the objectives and implement</p>

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			<p>the proposals in the LTP, with particular emphasis <u>The strategy to deliver sustainable transport in Aylesbury Vale is based on encouraging modal shift with greater use of more sustainable forms of transport and improving the safety of all road users.</u></p> <p>The 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 to ensure that development proposals will deliver 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 significant negative severe impact on the highway and public transportation network and encourages modal shift with greater use of more sustainable forms of transport.</u></p> <p>The Council will assist in delivering the pedestrian, cycle, public transportation and public realm improvements identified in Aylesbury town centre through to deliver the Aylesbury Garden Town initiative and Aylesbury Transport Strategy as well as the proposed any required improvements to the transportation network in Buckingham through and other areas of the Buckingham Transport Strategy Aylesbury Vale as required to help create deliver sustainable, healthy and thriving communities.</p>
MM207	203	7.12	<i>Delete paragraph</i>
MM208	205	7.20	<p><i>Delete paragraph 7.20 and insert;</i></p> <p><u>Local Schemes</u></p> <p><u>Local transport schemes identified below and in Policy T3 are defined as critical for the reason that they are essential to enable or unlock strategic housing and employment floor space essential to deliver the scale of growth identified in the Plan.</u></p>
MM209	205	T2	<p><i>Amend title and second paragraph;</i></p> <p><u>T2 Protected Supporting and protecting Transport Schemes</u></p> <p><u>The Council will continue to work with High Speed 2 Ltd with the aim of influencing the design and construction of the route through Aylesbury Vale to minimise adverse impacts and maximise any benefits that arise from the proposal including support of the Stoke Mandeville A4010 realignment. Subject to being within the provisions of the Act, the implementation of HS2 will also be expected to:</u></p>
MM210	205	T3	<p><i>Amend;</i></p> <p><u>T3 Supporting local transport schemes</u></p> <p>The Council <u>council</u> <u>will actively support key transport proposals including those identified in both the Aylesbury</u></p>

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			<p>Transport Strategy and Buckingham Transport Strategy.</p> <p>The route for the Oxford to Cambridge Expressway has yet to be agreed. The scheme is supported by the Council and once the agreed route is confirmed and further information is made available the scheme route will be protected in any review to the VALP.</p> <p><u>The council will support local transport schemes that provide benefits to the district in terms of reducing road congestion, providing mode choice and deliver the council's sustainable spatial strategy.</u></p> <p><u>Planning permission will not be granted for development that would prejudice or diminish the integrity of the implementation of existing or protected and supported required transport schemes identified in the list below. These required transport schemes are also shown on the Policies Map.</u></p> <p><i>Insert Table 17 attached at end of this appendix</i></p>
MM211	205	7.21	<i>Delete paragraph</i>
MM212	206	Following 7.24	<p><i>Insert;</i></p> <p><u>T4 Capacity of the transport network to deliver development</u></p> <p><u>New development will be permitted where there is evidence that there is sufficient capacity in the transport network to accommodate the increase in travel demand as a result of the development. The guidelines set out below which are taken from the Buckinghamshire Council's guidelines for Transport Assessment thresholds for development should be used in considering whether a transport impact assessment and travel plan will be required to assess the transport impacts of a development.</u></p> <p><u>Table 18</u></p> <p><i>Insert table 18 attached at end of this appendix</i></p> <p><u>Add new footnote – Where applications are made for 'open' class E uses the lowest threshold for uses in that class will be utilised.</u></p> <p><u>Renumber existing policy T4 as T5 and successive policies accordingly.</u></p>
MM213	207	7.29	<p><i>Amend;</i></p> <p>Vehicle parking standards including <u>eyele cycles</u> and motorcycle parking, based on Trip Rate Information Computer System data (TRICS), together with standards for non residential uses proposed within the district motorcycles, are included within set out in Appendix B of the design SPD-VALP.</p>
MM214	207	T5 (becomes T6)	<p><i>Amend;</i></p> <p>Development <u>All development must provide an appropriate level of car parking, taking in accordance with the standards set out in Appendix B. If a particular type of development is</u></p>

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			<p>not covered by the standards set out in Appendix B then the following criteria will be taken into account in determining the appropriate level of parking:</p> <ul style="list-style-type: none"> a. The accessibility of the site, including the availability of public transport, and b. The type, mix and use of development <u>c. Local car ownership levels</u> <u>d. Security and public realm</u> <u>e. Provision for both on street and off street parking where appropriate</u> <p>Garages/integral garages/car ports will not be included within the allocation of parking spaces unless they meet a minimum internal size as set out in the design SPD.</p> <p>Design must enable and encourage the maximum use of sustainable modes of transport, including provision for cyclists and low emission vehicles. Within Aylesbury, Buckingham, Haddenham, Wendover, and Winslow infrastructure for electric vehicles should be built into new major development schemes where local centres are proposed.</p> <p>Vehicle parking standards will be set out in the design SPD.</p> <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>
MM215	208	T6 (becomes T7)	<p><i>Amend clauses a, b and c;</i></p> <ul style="list-style-type: none"> a. The delivery of a strategic cycle network and improvements to the footpaths will be supported in accordance with any county-wide or local cycle strategies schemes identified in Policy T3 Supporting Local Transport Schemes and in the IDP Appendix b. The Council will protect existing cycle routes from adverse effects of new development. In dealing with planning applications the Council will seek new or improved cycle access and facilities <u>where necessary</u>, including cycle storage, and will use planning conditions or legal agreements to secure such arrangement. c. The Council will safeguard existing pedestrian routes from adverse effects of new development. Development proposals must provide for direct, convenient and safe pedestrian movement and routes, connected where appropriate to the existing pedestrian network and alongside strategic routes. In deciding planning applications the Council will use planning conditions or legal agreements to secure the provision of new footpaths and the improvement of existing routes.

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MM216	209	Following 7.35	<p><i>Insert two new paragraphs;</i></p> <p><u>An electric vehicle charging scheme submitted in support of a planning application will also need to include information that identifies how the charging equipment will be managed, e.g. who can use the charging points, payment arrangements, who will maintain the equipment.</u></p> <p><u>The standards used in this policy have been derived by reflecting the uptake in electric vehicles both nationally and locally and in line with other local authorities with a similar level of growth in the demand for electric vehicle and who have adopted standards to reflect this. (Lancaster City Council Provision of Electric Vehicle Charging Points for New Development Guidance for Developers September 2017).</u></p>
MM217	209	T7 (becomes T8)	<p><i>Delete and substitute;</i></p> <p><u>Electric Vehicle Parking</u></p> <p><u>Electric vehicle charging points will provided as set out below:</u></p> <p><u>a. Provision of parking bays and charging points for electric vehicles in new developments (including conversions)</u></p> <p><i>Insert table attached at end of this appendix</i></p> <p><u>* In private dwellings including flatted development the minimum of a 7.4 KW 32A or higher Type 2 electric vehicle dedicated charger will be installed. A charging rate of between 3.7kW 16A to 7.4kW 32A is needed to charge pure electric vehicles. For houses a switch inside the property will be provided for external sockets so that the power to the socket can be switched off (as technology changes the installation should reflect the most up to date guidance). Charging on this type of 'slow' charger usually takes 4-8 hours.</u></p> <p><u>**Dedicated freestanding weatherproof chargers</u></p> <p><u>*** Electric vehicle parking bay size of 3mx 6m set on the basis that cars are charged from the front or back and others are charged at the side, and this would allow for cable and connector around these vehicles and allow sufficient room to avoid cables and their inherent trip hazards and the like.</u></p> <p><u>b. Fast charge electric vehicle charging points (at least 7.4 kW 32A with a normal charge time of between 2-4 hrs) must be provided at long stay locations such as employment sites and railway station/long stay car parks.</u></p> <p><u>c. For high turnover parking, such as at a supermarket, leisure facility or hospital, 'rapid' electrical vehicle charging points will be installed (at least 43kW / 63A with a normal charge time of 30-60 minutes for an 80% charge) This is due to short time spent at such locations. In addition, fast charge electric vehicle charging points (at least 7.4kW 32A) should be provided at these locations.</u></p> <p><u>d. Charging points shall be provided at a minimum rate of one charging point for every 25 public parking spaces.</u></p>

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			<p><u>except at petrol stations where one space should be provided at each petrol station.</u></p> <p><u>e. Where development generates the need for a Transport Assessment to be undertaken, provisions should also be made for alternative fuel vehicle types including electric vehicles.</u></p>
MM218	211	8.1	<p><i>Add;</i></p> <p><u>Government planning policy sets out that local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment. The following paragraphs supporting policy BE1 'Heritage assets' are the response to that requirement.</u></p>
MM219	211	8.4	<p><i>Add;</i></p> <p><u>Where a designated heritage asset is affected by development proposed in this plan the appropriate policy makes specific reference to the heritage asset so that it can be taken into account in assessing relevant planning applications.</u></p>
MM220	216	BE1	<p><i>Amend second paragraph;</i></p> <p>Proposals for development shall contribute to heritage values and local distinctiveness. Where a development proposal is likely to affect a designated heritage asset and/or its setting <u>negatively</u>, the significance of the heritage asset and the impact of the proposal must be fully assessed and supported in the submission of an application. <u>The impact of the proposal must be assessed in proportion to the significance of the heritage asset and supported in the submission of an application.</u> Heritage statements and/or archaeological evaluations will be required for any proposals related to or impacting on a heritage asset and/or known possible archaeological site.</p> <p><i>Add to third paragraph;</i></p> <p><u>Heritage statements and/or archaeological evaluations may be required to assess the significance of any heritage assets and the impact on these by the development proposal.</u></p> <p><i>Amend clause b of fourth paragraph;</i></p> <p>b. Require development proposals that <u>would</u> cause substantial harm to, or loss of a designated heritage asset and its significance, including its setting, to provide a thorough heritage assessment setting out a clear and convincing justification as to why that harm is considered acceptable <u>on the basis of public benefits that outweigh that harm or the four circumstances in paragraph 133 of the NPPF all apply.</u> Where that case <u>justification</u> cannot be demonstrated proposals will not be supported unless the harm or loss is necessary to achieve substantial public benefits that outweigh the harm or loss and accord with the requirements of national guidance, and</p> <p><i>Amend final paragraph;</i></p> <p>Developments affecting a heritage asset should achieve a</p>

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			high quality design in accordance with adopted <u>the Aylesbury Vale Design SPD</u> and the Council will encourage modern, innovative design which respects and complements the heritage context in terms of scale, massing, design, detailing and use.
MM221	218	BE2	<p><i>Amend;</i></p> <p>All new development proposals shall follow the guidance set out within the Council's design SPD and shall respect and complement the <u>following criteria</u>:</p> <p>The physical characteristics of the site and its surroundings including the scale and context of the site and its setting a.</p> <p>b. The local distinctiveness and vernacular character of the locality, in terms of ordering, form, proportions, architectural detailing and materials</p> <p>c. The natural qualities and features of the area, and</p> <p>d. The effect on important public views and skylines.</p> <p><u>More guidance on the detail for the application and implementation of this policy will be provided in the Aylesbury Vale Design SPD.</u></p>
MM222	219	BE3	<p><i>Amend first sentence;</i></p> <p>Planning permission will not be granted where the proposed development would unreasonably harm any aspect of the amenity of existing residents and <u>would not</u> achieve a satisfactory level of amenity for future residents.</p>
MM223	220	BE4	<p><i>Amend;</i></p> <p>Proposed densities of developments should reflect those <u>generally constitute effective use of the land and reflect the densities</u> of their surroundings, and will be determined <u>appraised</u> on a site-by-site basis <u>to ensure satisfactory residential amenity</u>. Where large scale developments are proposed, particularly towards the edge of settlements, higher density areas should be located towards the centre of the sites whilst the rural edge should be a lower density. <u>The Aylesbury Vale Design SPD will provide further guidance to assist applicants on this matter.</u></p>
MM224	222	9.1 to 9.17	<p><i>Delete heading Protected sites and substitute;</i></p> <p><u>Biodiversity and geodiversity</u></p> <p><i>Merge and reorder policies and supporting text.</i></p> <p><i>Paragraph 9.6 to become 9.1</i></p> <p><i>Paragraph 9.7 to become 9.2</i></p> <p><i>Paragraph 9.8 to become 9.3</i></p> <p><i>Paragraph 9.9 to become 9.4</i></p> <p><i>Paragraph 9.10 to become 9.5</i></p> <p><i>Paragraph 9.11 to become 9.6</i></p> <p><i>Duplicated paragraphs 9.3 and 9.12 to become 9.7, deleting final sentence</i></p> <p><i>Paragraph 9.13 to become 9.8 amended;</i></p>

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			<p>The Council will <u>approach through Policy NE1 is to consider</u> planning applications for development affecting any of these sites against criteria weighted according to their ecological status and protection within <u>the hierarchy of sites, which assesses a particular site's local, national and international status (the hierarchy of sites).</u> A site's <u>Their</u> local context is particularly important. Therefore a <u>A</u> particular habitat or species may be nationally frequent but extremely rare locally, or nationally scarce and locally frequent. Examples of this include native black poplar, water vole, otter or Bechsteins bat, <u>which are locally frequent but nationally rare.</u> Development affecting any of these sites or species is expected to result in appropriate mitigation and where possible a net gain to their area or populations.</p> <p><i>Add new paragraph 9.9;</i></p> <p><u>Priority habitats are those habitats that were identified as being the most threatened and requiring conservation action under the UK Biodiversity Action Plan (UK BAP). Priority habitats and priority species are not always fully protected under UK wildlife laws. However, they can be sensitive to development and both national and local priority species and habitats are capable of being a material consideration when determining planning applications. Priority Habitats in Aylesbury Vale include the following: Lowland Calcareous Grassland, Lowland Meadow, Lowland Beech and Yew Woodland, Lowland Mixed Deciduous, Wet Woodland Wood Pasture and Parkland, Flood Plain Grazing Marsh, Eutrophic Standing Water, Lowland Fens, Ponds, Reedbeds, Rivers, Arable Field Margins, Hedgerows, Lowland Heathland, Open Mosaic Habitats on Previously Developed Land, Traditional Orchard. Although not always protected under UK wildlife laws, these sites may have been designated as nationally important such as a SSSI, Ancient Woodland or locally important, such as a Local Wildlife Site.</u></p> <p><i>Paragraph 9.14 to become 9.10 amended;</i></p> <p>Many species <u>have historically been</u> entirely dependent on human habitation for their reproductive success. <u>However,</u> mModern housing standards significantly reduce opportunities for these species. Consequently, where appropriate, features for biodiversity within development will be expected. Simple, inexpensive measures can result in significant gains and these are listed in Appendix 2 of the Buckinghamshire and Milton Keynes Natural Environment report 'Vision and Principles for the Improvement of Green Infrastructure in Buckinghamshire and Milton Keynes' (September 2016). These measures, if required, are <u>Such measures will be expected to be permanent in order to deliver meaningful ecological gain and protection. The location of any features for biodiversity provided in a development is very important. Therefore these Biodiversity features will be expected to be built integrated</u> into suitable structures rather than provided as vulnerable, isolated and temporary boxes <u>in order to help ensure the success of such</u></p>

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			<p><u>features.</u></p> <p><i>Paragraph 9.15 to become 9.11</i></p> <p><i>Paragraph 9.16 to become 9.12</i></p> <p><i>Paragraph 9.17 to become 9.13 amended;</i></p> <p>In order to <u>implement</u> achieve criterion (a) of the policy below, a <u>Buckinghamshire Biodiversity Accounting</u> sSupplementary pPlanning dDocument (SPD) will be prepared, <u>working in conjunction</u> with the other <u>Buckinghamshire councils</u> and <u>Milton Keynes Natural Environment Partnership</u> on a mechanism, to <u>explain how the policy objective of achieve no net loss and 'net gain' can be achieved.</u> 'Net gain' means <u>protecting existing habitats and ensuring lost or degraded environmental features are compensated for by restoring or creating environmental features that are of greater value to wildlife and people.</u> The SPD will <u>consider the possibilities of adopting a biometrics set out the expectations to use a recognised Biodiversity Impact Assessment calculator to quantify gains and losses and consider the threshold of development this should apply to,</u> <u>and how the requirement for net gain system</u> will be managed and monitored.</p> <p><i>Add new paragraph 9.14;</i></p> <p><u>A biometric calculator applies a statistical analysis to biological data and measures the habitat gains or losses of a development and then quantifies how many "biodiversity units" would be lost or gained. Any development would need to generate a net gain so the unit figure would need to be positive. A negative unit loss would need to be offset. The biodiversity unit value can be equated to monetary value, and the relevant details will be considered in the SPD. In this way, a calculator quantifies how many biodiversity units would need to be paid for by a development in order to offset any biodiversity loss. Offset providers are able to offer for sale conservation projects that deliver biodiversity units, and these may be bought by a developer. Developer contributions will need to seek to show a net gain on the biometric calculator. A best practice methodology should be used to determine the quantitative ecological impact of any development – for example the most recent Warwickshire County Council's biodiversity impact assessment calculator – until a formally agreed local approach is set out tin the SPD, agreed by Buckinghamshire Council in conjunction with the Buckinghamshire and Milton Keynes Natural Environment Partnership. These assessments must be undertaken in accordance with nationally accepted standards and guidance including the DEFRA metric, BS 8683 Biodiversity net gain in project design and construction; and CIRIA Biodiversity Net Gain good practice principles for development.</u></p> <p><i>Paragraph 9.1 to become 9.15, deleting last sentence and substituting;</i></p> <p><u>The 28 SSSIs in the district are:</u></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<ul style="list-style-type: none"> • <u>Ashridge Commons & Woods</u> • <u>Aston Clinton Ragpits</u> • <u>Bacombe and Coombe Hills</u> • <u>Bierton Clay Pit</u> • <u>Bugle Quarry</u> • <u>Dancer's End</u> • <u>Dancer's End Waterworks</u> • <u>Finmere Wood</u> • <u>Foxcote Reservoir and Wood</u> • <u>Grendon and Doddershall Woods</u> • <u>Ham Home-cum-Hamgreen Woods</u> • <u>Ivinghoe Hills</u> • <u>Kings & Bakers Woods and Heaths</u> • <u>Long Herdon Meadow</u> • <u>Muswell Hill</u> • <u>Pilch Fields</u> • <u>Pitstone Hill</u> • <u>Pitstone Quarry</u> • <u>Poker's Pond Meadow</u> • <u>Rushbeds Wood</u> • <u>Shabbington Woods Complex</u> • <u>Sheephouse Woods Complex</u> • <u>Stone</u> • <u>Tingewick Meadows</u> • <u>Tring Reservoirs</u> • <u>Warren's Farm (Stewkley)</u> • <u>Weston Turville reservoir</u> • <u>Whitecross Green and Oriel Woods</u> <p>Paragraph 9.4 to become 9.16 deleting final two sentences Paragraph 9.2 to become paragraph 9.60 Delete paragraph 9.5</p>
MM225, MM226 and MM227 not used			
M228	222	NE1	<p><i>Amend;</i></p> <p><u>NE1 Protected Sites Biodiversity and Geodiversity Protected Sites</u></p> <p><u>Internationally or nationally important Protected Sites (SACs and SSSIs) and species will be protected. Avoidance of likely significant adverse effects should be the first option. Development likely to affect the Chiltern Beechwoods SAC will be subject to assessment under the Habitat Regulations and will not be permitted unless any significant adverse</u></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><u>effects can be fully mitigated.</u></p> <p>Development proposals that would lead to an individual or cumulative significant adverse impact on an internationally or nationally important Protected Site or species such as SSSIs, or irreplaceable habitats such as ancient woodland or ancient trees—the Council will be refused unless exceptional circumstances can be demonstrated and that the impacts to the site are clearly out weighed by the benefits of development as follows:</p> <p>Sufficient information must be provided for the Council to assess the significance of the impact against the importance of the protected site and the species which depend upon it. This will include the area around the protected site. Planning permission will be granted only where:</p> <p>a. the benefits of the development affecting the site significantly and demonstrably clearly outweigh both the any adverse impacts on the protected site and the ecosystem it provides that it is likely to have on the features of the site that make it internationally or nationally important and any broader impacts on the national network – for example - of Sites of Special Scientific Interest, and</p> <p>b. the loss can be mitigated and compensation can be provided to achieve a net gain in biodiversity/geodiversity. development has followed a mitigation hierarchy of avoid, then mitigate if avoidance cannot be achieved — then compensate/offset if mitigation cannot be achieved. Avoidance will require the applicant the applicant to demonstrate that the development could not be located in an alternative, less harmful location.</p> <p><u>Sufficient information must be provided for the Council to assess the significance of the impact against the importance of the Protected Site and its component habitats and the species which depend upon it. This will include the area around the Protected Site and the ecosystem services it provides and evidence that the development has followed the mitigation hierarchy set out in (d) below.</u></p> <p><u>Protection and enhancement of Biodiversity and Geodiversity</u></p> <p><u>Protection and enhancement of biodiversity and geodiversity will be achieved by the following:</u></p> <p><u>c. A net gain in biodiversity on minor and major developments will be sought by protecting, managing, enhancing and extending existing biodiversity resources, and by creating new biodiversity resources. These gains must be measurable using best practice in biodiversity and green infrastructure accounting and in accordance with any methodology (including a Biodiversity Impact Assessment) to be set out in the Biodiversity and Geodiversity Supplementary Planning Document.</u></p> <p><u>d. If significant harm to biodiversity resulting from a</u></p>

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			<p>development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or as a last resort, compensated for, then development will not be permitted. If a net loss in biodiversity is calculated, using a suitable Biodiversity Impact Assessment (see c) then avoidance, mitigation and compensation, on site first, then offsite must be sought so the development results in a net gain (percentage of net gain to meet any nationally-set minimum standard and or as detailed in an SPD) in order for development to be permitted. Mitigation, compensation and enhancement measures must be secured and should be maintained in perpetuity. These assessments must be undertaken in accordance with nationally-accepted standards and guidance (BS 8683 Biodiversity net gain in project design and construction; and CIRIA Biodiversity Net Gain Good practice principles for development).</p> <p>e. Development which would result in damage to or loss of a site of biodiversity or geological value of regional or local importance (such as Local Wildlife Sites or Local Geological Sites) including habitats of principal importance (known as Priority Habitats) or species of principal importance (Priority species or their habitats will not be permitted except in exceptional circumstances where the need for, and benefits of the development significantly and demonstrably outweigh the harm it would cause to the site, and the loss can be mitigated and compensation provided to achieve a net gain.</p> <p>f. The Council will, where appropriate, expect ecological surveys for planning applications. These must be undertaken by a suitably qualified person and consistent with nationally accepted standards and guidance (BS 42020: Biodiversity – Code of Practice for planning and development) as replaced.</p> <p>g. Where development proposals affect a Priority Habitat (As defined in the Buckinghamshire and Milton Keynes Biodiversity Action Plan or UK Biodiversity Action Plan and as listed in accordance with s41 of the NERC Act 2006) then mitigation should not be off-site. Where no Priority Habitat is involved then mitigation is expected to follow the mitigation hierarchy, where options for avoidance, mitigation and compensation on- site, and then offsite compensation, should be followed in that order as outlined in d. When there is a reasonable likelihood of the presence of protected or priority species or their habitats, development will not be permitted until it has been demonstrated that the proposed development will not result in adverse impacts on these species or their habitats. The only exception will be where the advantages of development to the protected site and the local community clearly outweigh the adverse impacts. In such a case, the Council will consider the wider implications of any adverse impact to a protected site, such as its role in providing a vital wildlife corridor, mitigating flood risk or ensuring good water quality in a catchment.</p> <p>h. Development proposals will be expected to promote site</p>

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			<p>permeability for wildlife and avoid the fragmentation of wildlife corridors, incorporating features to encourage biodiversity, and retain and where possible enhance existing features of nature conservation value on site. Existing ecological networks should be identified and maintained to avoid habitat fragmentation, and ecological corridors including water courses should form an essential component of green infrastructure provision in association with new development to ensure habitat connectivity</p> <p>i. Planning conditions/obligations will be used to ensure net gains in biodiversity by helping to deliver the Buckinghamshire and Milton Keynes Biodiversity Action Plan targets in the biodiversity opportunity areas and other areas of local biodiversity priority. Where development is proposed within, or adjacent to, a biodiversity opportunity area, biodiversity surveys and a report will be required to identify constraints and opportunities for biodiversity enhancement. Development which would prevent the aims of a Biodiversity Opportunity Area from being achieved will not be permitted. Where there is potential for development, the design and layout of the development should secure biodiversity enhancement and the Council will use planning conditions and obligations as needed to help achieve the aims of the biodiversity opportunity area. A monitoring and management plan will be required for biodiversity features on site to ensure their long-term suitable management (secured through planning condition or Section 106 agreement).</p> <p>j. Development proposals adversely affecting a Local Nature Reserve will be considered on a case-by-case basis, according to the amount of information available about the site and its significance, relative to the type, scale and benefits of the development being proposed and any mitigation. Any mitigation strategy will need to include co-operation with the nature reserve managers.</p>
MM229, MM230 and MM231 not used			
MM232	225	NE2	<i>Delete policy</i>
MM233	228	NE4	<p><i>Add to final sentence;</i></p> <p><u>Any development likely to impact on the AONB should provide a Landscape and Visual Impact Assessment (LVIA) in line with the Guidelines for Landscape and Visual Impact Assessment - version 3 or as amended.</u></p>
MM234	231	NE5	<p><i>Amend;</i></p> <p>To ensure that the district's landscape character is maintained, development must have regard to the 2008 LCA</p>

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			<p>(as amended 2015 and any future review). Development must recognise the individual character and distinctiveness of particular landscape character areas set out in the <u>Landscape Character Assessment (LCA)</u> their sensitivity to change and contribution to a sense of place. Development should consider the role <u>characteristics</u> of the landscape character area by <u>and</u> meeting all of the following criteria:</p> <ul style="list-style-type: none"> a. be grouped where possible with existing buildings to minimise impact on visual amenity b. be located to avoid the loss of important on-site views and off-site views towards important landscape features c. reflect <u>respect</u> local character and distinctiveness in terms of settlement form and field pattern, topography and ecological value d. Carefully consider spacing, height, scale, plot shape and size, elevations, roofline and pitch, overall colour palette, texture and boundary treatment (walls, hedges, fences and gates) e. minimise the impact of lighting to avoid blurring the distinction between urban and rural areas, and in areas which are intrinsically dark and to avoid light pollution to the night sky f. ensure that the <u>development is</u> buildings and any outdoor storage and parking areas are not visually prominent in the landscape, <u>and</u> g. not generate an unacceptable level and/or frequency of noise in areas relatively undisturbed by noise and valued for their recreational or amenity value <p>The first stage in mitigating impact is to avoid any the identified <u>significant adverse</u> harmful impact. Where it is accepted there will be harm to the landscape character, specific on-site mitigation will be required <u>to minimise that harm</u> and, as a last resort, compensation may <u>will</u> be required appropriate as part of a planning application. <u>This reflects the mitigation hierarchy set out in paragraph 152 of the NPPF (2012)</u>. Applicants must consider the enhancement opportunities identified in the LCA and how they apply to a specific site.</p> <p>The Policies Map defines areas of attractive landscape (AALs) and local landscape areas (LLAs) which have particular landscape features and qualities considered appropriate for particular conservation and enhancement opportunities. Of the two categories, the AALs areas of attractive landscape have the greater significance. Development in AALs and LLAs should have particular regard to the character identified in the report 'Defining the special qualities of local landscape designations in Aylesbury Vale District' (Final Report, 2016) and the LCA (2008).</p> <p><u>Development will be supported where appropriate mitigation</u></p>

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			<p><u>to overcome any adverse impact to the character of the receiving landscape has been agreed.</u></p> <p>Development that adversely affects this character will not be permitted unless appropriate mitigation can be secured. Where permission is granted, the Council will require conditions to best ensure the mitigation of any harm caused to the landscape.</p>
MM235	237	NE8	<p><i>Amend;</i></p> <p>Subject to the development allocations set out in the VALP, the Council will seek to protect the best and most versatile farmland for the longer term. <u>Proposals involving development of agricultural land shall be accompanied by an assessment identifying the Grades (1 to 5) Agricultural Land Classification.</u> Where development involving best and more versatile agricultural land (<u>Grades 1,2 and 3a</u>) is proposed, those areas on site should be preferentially used as green open space and built structures avoided. Where <u>significant</u> development would result in the loss of best and more versatile agricultural land, planning consent will not be granted unless:</p> <ol style="list-style-type: none"> There are no otherwise suitable sites of poorer agricultural quality that can accommodate the development, and The benefits of the proposed development outweighs the harm resulting from the significant loss of agricultural land.
MM236	239	NE9	<p><i>Insert after second paragraph;</i></p> <p><u>Development that would lead to an individual or cumulative significant adverse impact on ancient woodland or ancient trees will be refused unless exceptional circumstances can be demonstrated that the impacts to the site are clearly outweighed by the benefits of the development.</u></p> <p><i>Amend fourth, fifth and sixth paragraphs;</i></p> <p>Where species-rich native hedgerow (as commonly found on agricultural land) loss is unavoidable the developer needs to <u>must</u> compensate for this loss by planting native species-rich hedgerow, which. This should result in a net gain of native hedgerow on the development site.</p> <p>Developers should aspire to retaining a 10m (with a minimum of 5m) natural buffer around retained and planted native hedgerows (100m with a minimum 25m natural buffer around woodlands) for the benefit of wildlife, incorporating a dark corridor with no lighting.</p> <p><u>Development must provide buffers to Ancient Woodland and should provide additional planting to join up fragmented areas of woodland as part of the development's GI. Buffers should allow the maximum space proportionate to the development, and would generally be expected to be a minimum of 50m between the ancient woodland and any built development or grey infrastructure.</u> Within the buffer, native trees may be planted along with other ecology</p>

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			features to secure net gains in biodiversity and/or landscape mitigation unless the achievement of this would be contrary <u>to with</u> other policies in the plan.
MM237	241	10.8	<i>Amend;</i> The Council only permits the re-use of existing permanent buildings under this policy. This ensures that it is not used to establish a permanent use on a site where only a temporary consent exists or where a permanent use has lapsed as a result of dereliction. <u>The Council does not wish to penalise those who have recently lost convertible buildings due to accidental damage such as a fire.</u> Therefore However, exceptionally, the Council may permit the re-use of a derelict <u>such a</u> building if the applicant can demonstrate that dereliction was the result of severe accidental damage or accidental destruction, for example by fire, in the past two years.
MM238	242	10.11	<i>Amend;</i> The Council supports the re-use of buildings in the countryside, particularly those close to towns and villages, as a means of supporting sustainable growth. <u>However it is not considered that t</u> The re-use of buildings in the countryside well away from settlements, such as those that are located well away from the public highway in locations not served by utilities <u>would be sustainable due to traffic impacts, distance to facilities and the expense of providing utilities like</u> such as sewerage, water and electricity, <u>so re-use of such buildings</u> will generally not be allowed.
MM239	242	10.15	<i>Amend;</i> For existing agricultural buildings over 500sqm, the Council may not permit its retention and re-use if it considers that the <u>characteristics of the</u> existing building hasve <u>have</u> a harmful impact on its <u>immediate</u> surrounding or the wider landscape. Often, the removal of disused agricultural buildings <u>which are damaging to rural character</u> is preferable to retention as it can bring about an environmental improvement. This is most likely to be the case with a modern building, whose retention and re-use is unlikely to be acceptable if it is large in scale, clad with unattractive materials such as profiled steel or asbestos sheeting, or has a very utilitarian appearance.
MM240	243	10.24	<i>Amend;</i> Within settlements <u>it will be particularly important to ensure that any extension does not harm the essential character of its surroundings so,</u> an extension may be acceptable if it is designed with sensitivity for the host building and does not conflict with any other planning requirements. <u>In all locations</u> a <u>An extension should enhance the character and appearance of its immediate surroundings, and where possible, make a positive contribution in the wider area, so as to preserve an area's essential rural character.</u>

Ref	Page	Policy/ Paragraph	Main Modification
MM241	243	C1	<p><i>Amend clauses a, h and l and insert two new clauses between clauses e and f;</i></p> <p>a. Conversion works should not involve major reconstruction or significant extensions and should respect the character of the building and its setting, <u>except in exceptional circumstances where it can be demonstrated that dereliction was the result of severe accidental damage or accidental destruction in the past two years</u></p> <p><i>(new clause) f. The existing building is not located well away from existing settlements and is not located where utilities are not available</i></p> <p><i>(new clause) g. The existing building is not damaging to the surrounding character by virtue of a utilitarian appearance or cladding in unattractive materials</i></p> <p>h. Any extension to the existing barn conversion is modest in scale, ancillary in nature, subordinate to the main building, and in keeping with the rural character, <u>designed with sensitivity to the host building and will enhance the character and appearance of its immediate surroundings.</u></p> <p>l. Conversion works should not adversely impact upon wildlife using the structure. If impacts to nesting sites are unavoidable mitigation will be required (see Policy NE2 <u>1</u>).</p>
MM242	248	C2	<p><i>Amend clause g, insert new clause to follow clause n, amend clause o and insert new clause to follow clause o;</i></p> <p>g. The scale, construction and appearance of the proposed development including the entrance and boundary treatment should be designed to minimise adverse impact on the <u>immediate locality</u>, landscape character and residential amenity.</p> <p>n. any new buildings and ancillary facilities would be erected to integrate with the existing building (or group of buildings), <u>and</u></p> <p><u>o. be supported by a business plan that shows the proposed enterprise has a sound financial basis</u></p> <p><i>o (to become p). it can be justified in that location and is of a size and scale appropriate to the existing commercial enterprise, or the number of privately kept horses that will use the facility,</i></p> <p><u>q. any floodlighting is reasonably necessary and at an appropriate level for the use, and</u></p> <p><i>(p becomes r)</i></p>
MM243	252	C3	<p><i>Insert at start;</i></p> <p><u>All development schemes should look to achieve greater efficiency in the use of natural resources.</u></p> <p><i>Insert after first paragraph;</i></p> <p><u>The Council will seek to ensure that all development schemes achieve greater efficiency in the use of natural resources, including measures minimise energy use, improve water efficiency and promote waste minimisation and</u></p>

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			<p><u>recycling. Developments should also minimise, reuse and recycle construction waste wherever possible.</u></p> <p><i>Amend first sentence and clause 1 of second paragraph;</i></p> <p>In seeking to achieve carbon emissions reductions, the Council will promote <u>assess developments using</u> an 'energy hierarchy'.</p> <p>1. an energy statement will be encouraged <u>required</u> for proposals for major residential developments (over 10 dwellings), and all non-residential development, to demonstrate how the energy hierarchy has been applied.</p> <p><i>Amend second sentence of third paragraph;</i></p> <p>A feasibility assessment for district heating (DH) and cooling utilising technologies such as combined heat and power (CHP), including biomass CHP or other low carbon technology, will be encouraged <u>required</u> for:</p> <p><i>Amend fourth paragraph;</i></p> <p>Where feasibility assessments demonstrate that decentralised energy systems are deliverable and viable and can secure <u>at least</u> 10% of their energy from decentralised and renewable or low carbon sources, such systems will be required <u>encouraged</u> as part of the development.</p> <p><i>Add final paragraph;</i></p> <p><u>Applications for the adaption of older buildings should include improved energy and water efficiency and retrofitted renewable energy systems where possible.</u></p>
MM244	254	10.63	<i>Delete final sentence</i>
MM245	254	C4	<p><i>Amend;</i></p> <p>The Council will enhance and protect public rights of way to ensure the integrity and connectivity of this resource is maintained.</p> <p>The protection and conservation of public rights of way needs to be reconciled with the benefits of new development, to maximise the opportunity to form links from the development to the wider public rights of way network, public transport, recreational facilities and green infrastructure. <u>Development proposals will be required to retain and enhance existing green corridors, and maximise the opportunity to form new links between existing open spaces.</u> Planning permission will not normally be granted where the proposed development would cause unacceptable harm to the safe and efficient operation of public rights of way.</p>
MM246	256	11.1	<p><i>Precede existing text with;</i></p> <p><u>Open space includes green infrastructure and also civic space including market squares and other hard surfaced community areas used for community activities. However, hard surfaced or civic spaces do not count as providing green infrastructure to meet Policy I1.</u></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><i>Add at end of existing text;</i></p> <p><u>(water related green infrastructure is also known as 'Blue Infrastructure'). Where the VALP site allocations require (or development coming forward on any other site that would be required to meet the standards in Policy I1) 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>
MM247	256	11.2	<p><i>Amend;</i></p> <p>Well-planned multi-functional green infrastructure is an important component of achieving sustainable communities. Green infrastructure helps to deliver conservation and enhancement of biodiversity, create a sense of place and appreciation of valuable landscapes and cultural heritage, increase recreational opportunities and support healthy living, improve water resources and flood management as part of environmentally sustainable design. It <u>can</u> also positively contributes <u>towards</u> combating climate change through adaptation and mitigation of impacts and production of food, natural fibre and fuel. It helps deliver NHS initiatives around improving people's health and tackling obesity. The district's high quality green infrastructure is a vital asset and an important element in ensuring that the district is somewhere people choose to live and locate their businesses. Policy I1 below will be used to ensure a green infrastructure network is provided across <u>throughout</u> the district with enhancements helping to replace <u>remedy</u> existing green infrastructure deficiencies.</p>
MM248	256	11.4	<p><i>Delete and substitute;</i></p> <p><u>The following Green Infrastructure Strategies cover Aylesbury Vale at varying hierarchal levels:</u></p> <ul style="list-style-type: none"> • <u>Vision and Principles for the Improvement of Green Infrastructure in Buckinghamshire & Milton Keynes (2016)</u>. County-wide. Produced by the Buckinghamshire and Milton Keynes Natural Environment Partnership ("NEP"), the Vision and Principles set out 9 Principles which should be followed to achieve the NEP vision by 2030. • <u>Buckinghamshire Green IDP (2013)</u> County-wide. The Delivery Plan includes specific project areas in the district, particularly Whaddon Chase, west of Milton Keynes and Aylesbury Linear Park. Part of Aylesbury Linear Park is being delivered through Berryfields and Kingsbrook (Aylesbury East) Major Development Areas (MDA's). Kingsbrook will provide approximately 100ha of wetlands park. Further development sites around Aylesbury should deliver green infrastructure in-line with the Delivery Plan. • <u>Aylesbury Vale Green Infrastructure Strategy (2011)</u> District-wide detail. The Green Infrastructure

Ref	Page	Policy/ Paragraph	Main Modification
			<p>Strategy follows on from the 2009 Buckinghamshire Green Infrastructure Strategy. These strategies identified green infrastructure deficiencies within the district – for example, 69% of dwellings do not meet any of Natural England's Accessible Natural Green space standards (ANGSt). Priority areas identified include North Aylesbury Vale and Aylesbury Environs.</p> <ul style="list-style-type: none"> • Aylesbury Garden Town will have an accompanying Masterplan which will set out how Green Infrastructure will be integrated into new and existing Garden Town developments. <p><i>Insert footnote links to the documents referred to in bold</i></p>
MM249	256	11.5	<p><i>Delete and substitute five new paragraphs;</i></p> <p><u>The 'Assessment for Open Space, Sports and Recreation Needs for Aylesbury Vale: Final Report' (2017) identifies typologies of green infrastructure, current provision of green infrastructure, provision standards and future need based on applying those standards. The 2017 Final Report makes clear that green infrastructure is able to cover any number of the typologies identified. It also identifies specific green infrastructure features which can enhance the sport and recreational value of green space while not duplicating other provision in an area. Therefore, the approach in the VALP Policy I1 is for Green Infrastructure to perform a range of functions where possible in order to enhance the sport and recreation value of green space.</u></p> <p><u>The 2017 final Report also identifies accessibility/quantitative and qualitative standards to be applied to new development. These standards have been incorporated into the VALP to be applied for larger new housing developments or mixed use proposals including an element of housing. Quantitative standards are the size of green space provision. Accessibility standards represent a zone of influence of a provision and the distance that people are prepared to travel. The standards to be used are the ANGSt, developed nationally in the 1990s and reviewed by Natural England in 2008. These standards were also recommended in the Aylesbury Vale Green Infrastructure Strategy 2011.</u></p> <p><u>The ANGSt are a response to Natural England's belief that everyone should have access to good quality natural greenspace near to where they live. The three underlying principles of ANGSt are: Improving access to greenspaces; Improving naturalness of greenspaces; and Improving connectivity with greenspaces. The distances in the ANGSt are based on research into the minimum distances people would travel to experience the natural environment.</u></p> <p><u>In terms of meeting the ANGSt, to be 'Accessible' a place must be "available for the general public to use free of</u></p>

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			<p><u>charge and without time restrictions (although some sites may be closed to the public overnight and there may be fees for parking a vehicle)”. The places must be available to all, which means that every reasonable effort must be made to comply with the requirements under the Equality Act (2010). For a space to be ‘Natural’ it must be a “place where human control and activities are not intensive so that a feeling of naturalness is allowed to predominate”</u></p> <p><u>The 2017 Final Report refers to the Buckinghamshire Green Infrastructure Strategy (2009) that identifies deficiencies across the district against the ANGSt standards for access to natural greenspace. Only three settlements in Aylesbury Vale – Aston Clinton, Buckingham and Wendover – meet the minimum ANGSt requirements for the provision of larger accessible green space. Many parts of Aylesbury Vale do not meet the standard of providing at least one 20ha site within 2km or one 500ha site within 10km of people’s homes. There is also a deficiency of accessible green infrastructure over 100ha in Aylesbury Vale.</u></p>
MM250, MM251, MM252 and MM253 not used			
MM254	257	11.6	<p><i>Amend;</i></p> <p>Development proposals, particularly on larger sites, <u>provide an can offer the opportunity to improve the green infrastructure network (as demonstrated through the Berryfields and Aylesbury East MDAs), Policy I1 seeks looks to achieve this. Green infrastructure will be delivered through development proposals and will be obligated either on site or off site obligations will be imposed through the CIL regime, S106 contributions or conditions to the planning permission as appropriate. HS2 mitigation works will also deliver some green infrastructure. All green infrastructure proposals should include details of management and maintenance to ensure these areas are permanently protected.</u></p>
MM255	257	11.7	<p><i>Amend;</i></p> <p><u>Although Policy I1 is the primary policy for green infrastructure, several VALP policies will also secure elements of green infrastructure. Policy T6 ensures development connects to existing pedestrian and cycle networks and provides new facilities; Policy NE12 secures biodiversity enhancements; and Policy I2 sets out what is required in terms of sport and recreation provision. Development proposals will be expected to identify, retain and enhance existing green infrastructure assets, including</u></p>

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			<p>corridors and <u>to ensure new links are provided between existing green spaces. Local green space designations, which are a fairly new concept now commonplace in neighbourhood plans, will mean provide protection for those areas, as outlined in Policy NE6. Green infrastructure should ensure permeability for wildlife through development and provide sufficient beneficial habitat to support target species, independent of its connective function. The incorporation of sustainable drainage systems can contribute to green infrastructure provision as well as helping to alleviate flooding and bringing providing other biodiversity benefits. New landscaping areas are important and will be required in larger development schemes to assimilate development into the landscape and assist in the transition between the urban and rural boundary. The size and location of green infrastructure is expected to be suitable for the function it is intended to fulfil.</u></p>
MM256	257	11.9	<p><i>Delete and substitute;</i></p> <p><u>The accessibility/quantitative and qualitative standards will apply to development proposals of 10 homes or more and which have maximum combined gross floorspace of more than 1,000 square metres (gross internal area). These thresholds are a national standard in Planning Practice Guidance for securing infrastructure contributions through planning applications. It is also considered a threshold whereby at 10 or more homes the development is more likely to itself create a deficiency. Where the standards are applicable, development proposals will need to demonstrate to the Council that a development itself, with committed developments, would not create a deficiency.</u></p>
MM257	258	11.10	<p><i>Delete and substitute two new paragraphs;</i></p> <p><u>Long term stewardship of the public realm is important to ensure that open space provided from development is maintained to high standards. The Open Space, Sports, Leisure and Public Realm SPD will set out detailed guidance for the maintenance and adoption of open space, and will set out how maintenance is to be provided by a developer; at what time period land ownership should be transferred to the Council or other body; and how payments may be required towards future maintenance after the land transfer – including arrangements for Performance Bonds. In the case of open space not being provided on site, the SPD will also set out a calculation for the financial amount due as a developer contribution and the general approach to the use of such contributions.</u></p> <p><u>The SPD will set out the details as to how the policy and standards in Appendix C are to be implemented and guidance for where they will be appropriate for on or off site provision for open space, sports and leisure facilities (see Policy 12) and public realm. The SPD will also set out any possible exceptions to on or off site provision. Finally, the</u></p>

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			<u>SPD will set out any good practice which the Council suggests should be followed in terms of how open space, sports and recreation and public realm are provided in/from development.</u>
MM258 and MM259 not used			
MM260	258	I1	<p><i>Delete and substitute;</i></p> <p><u>Green infrastructure should provide a range of functions and provide multiple benefits for wildlife, improving quality of life and water quality and flood risk, health and wellbeing, recreation, access to nature and adaptation to climate change. The Council will support proposals for green infrastructure where there is no significant adverse impact on:</u></p> <ul style="list-style-type: none"> <u>a. Wider green infrastructure networks including public rights of way and green infrastructure opportunity zones identified by the Buckinghamshire and Milton Keynes Natural Environment Partnership</u> <u>b. Potential to contribute to biodiversity net gains</u> <u>c. Management of flood risk and provision of sustainable drainage systems</u> <u>d. Provision of a range of types of green infrastructure</u> <u>e. Provision of sports, recreation facilities or public realm improvements</u> <u>f. Potential for local food cultivation by communities</u> <u>g. Achieving a satisfactory landscaping scheme including the transition between the development and adjacent open land</u> <p><u>New housing developments of more than 10 homes or which have a combined gross floorspace of more than 1,000 square metres (gross internal area) will be required to meet the ANGSt (accessible natural green space standards) in Appendix C to meet the additional demand arising from new residential development. Amenity green space will need to be provided on site. Sports and recreation facilities can be provided as required (Policy I2) on the same site where these are compatible with publicly accessible green infrastructure.</u></p> <p><u>The Accessibility Standards in Appendix C will need to be met by providing accessible natural green space on or off site for developments of more than 10 homes and which have maximum combined gross floorspace of more than 1,000 square metres (gross internal area) unless it has been demonstrated in an assessment for a planning application that accessible natural green space provision has already been met, when including the increased population of the new development and any other committed development.</u></p>

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			<p><u>Conditions will be imposed on permissions or planning obligations sought in order to secure green infrastructure reasonably related to the scale and kind of housing proposed. The benefits to be obtained or provided by the Council by virtue of the obligation will be directly relevant to the development permitted and the needs of its occupiers and fairly and reasonably related to its scale and kind.</u></p> <p><u>To count towards any ANGSt quantitative/accessibility requirements, such green space must meet the definitions of 'accessible' and 'natural' in paragraph 11.8.</u></p> <p><u>The Council will only accept the loss of ANGSt including the incorporation of such areas into private garden land if:</u></p> <p><u>h. The ANGSt has been subject to an assessment which shows it to be surplus to requirements</u></p> <p><u>i. The land does not fulfil a useful purpose in terms of its appearance, landscaping, recreational use or wildlife value</u></p> <p><u>j. The land does not host an element of semi-natural habitat or any other feature of value to wildlife to a greater extent than would be the case if it were planted as a garden</u></p> <p><u>k. The loss of publicly accessible green infrastructure would not set a precedent for other similar proposals which could cumulatively have an adverse effect on the locality or the environment</u></p> <p><u>l. The continued maintenance of the land for publicly accessible green infrastructure would be impractical or unduly onerous</u></p> <p><u>m. Publicly accessible green infrastructure lost will need to be replaced by equivalent or better following an assessment justifying this need based on applying the standards in Appendix C</u></p> <p><u>Formal outdoor sports areas, play areas, and allotments all serve a specific purpose and may be located within or outside ANGSt. Either way such facilities should be located on land that is additional to the ANGSt provided by a developer and be complimentary to it.</u></p> <p><u>Green infrastructure being provided must have a long term management and maintenance strategy to be agreed by the Council with assets managed for at least 30 years after completion and during this time secure a mechanism to manage sites into perpetuity. The management and maintenance strategy shall set out details of the owner, the responsible body and how the strategy can be implemented by contractors.</u></p>
MM261	260	11.12	<p><i>Delete and substitute;</i></p> <p><u>Accessible natural green space required through Policy I1 does not need to be planned separately and can co-exist within a properly masterplanned approach for open space on a development site. However, sports and leisure facilities provided to meet Policy I2 must be treated separately to accessible natural green space so these areas can function to</u></p>

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			<u>ensure financial sustainability. Sports facilities are usually hired for a fee and may include built facilities such as a pavilion or club house. Access is usually limited and sports facilities may be co-located or shared with a school, college, community hall or sports club.</u>
MM262	260	11.15	<p><i>Delete and substitute six new paragraphs;</i></p> <p><u>The 2019 Playing Pitch and Built Facilities Strategies look closely at the users of facilities in the district and the existing facilities and sets out whether the existing facilities are adequate or not, need replacing, or can be expanded. The 2019 Playing Pitch Strategy (PPS) will ensure a strategic approach to playing pitch provision. The PPS will act as a tool for AVDC and partner organisations to guide resource allocation and to set priorities for pitch sports in the future. The PPS will provide robust evidence for capital funding. As well as proving the need for developer contributions towards pitches and facilities, the PPS provides evidence of need for a range of capital grants. Current funding examples include the Sport England Funding Programmes, Heritage Lottery Fund (for park improvements), the Football Foundation and the Big Lottery.</u></p> <p><u>The PPS is a complete update and replacement of the 2010 Playing Pitch Strategy and will utilise elements of the 2017 Assessment of Open Space, Sport and Recreation Needs for Aylesbury Vale. The PPS will be produced in consultation with Sport England, National Governing Bodies of Sport, Neighbouring Local Authorities, Leisure Operators and Developers, Outdoor Sports Leagues, Major Sports Clubs, LEAP and Parish and Town Councils and will follow Sport England's Playing Pitch Strategy Guidance.</u></p> <p><u>A Built Facilities Strategy 2019 (BFS) is a strategic assessment that will provide an up to date analysis of the supply and demand of built sports facilities across Aylesbury Vale. In conjunction with the PPS, the BFS will provide a holistic analysis of sports facilities across the study area, leading to a comprehensive set of recommendations for the future development of facilities, in line with the demands and needs of local residents. The BFS will help ensure the priority provision, adoption and maintenance of sport and leisure facilities in the Vale. The facilities covered in the BFS will be swimming pools, sports halls, community halls, health and fitness/gyms, athletics, gymnastics, indoor tennis, indoor bowls, squash courts, multi sport leisure complex/sports villages and gymnastic centres. The Strategy will be produced in partners including Sport England, Leap, Bucks NHS CCG, Parish and Town Councils, site operators and Wheelpower.</u></p> <p><u>Long term stewardship of sports and recreation facilities is</u></p>

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			<p><u>important to ensure facilities provided from development are maintained to high standards. The Open Space, Sports, Leisure and Public Realm SPD will set out detailed guidance for the maintenance and adoption of facilities. The SPD will cover how maintenance is to be provided by a developer; at what time period land ownership should be transferred to the Council or another body; and how payments may be required towards future maintenance after the land transfer. In the case of facilities not being provided on site, the SPD will also set out a calculation for the financial amount due as a developer contribution and the general approach to what such contributions will be used for.</u></p> <p><u>The SPD will set out guidance for where it will be appropriate for on or off site provision for open space, sports and leisure facilities (see Policy 12) and public realm. The SPD will also set out any possible exceptions to on or off site provision. The SPD will set out arrangements in general terms for Performance Bonds which will cover the expenses associated with the provision, maintenance and administration of open space, sports and leisure facilities and public realm. Finally, the SPD will set out any good practice which the Council suggests should be followed in terms of how open space, sports and recreation and public realm are provided in/from development.</u></p> <p><u>A new Sports and Leisure Facilities SPD and new Ready Reckoner are in preparation to be completed in early 2019 once the VALP has been adopted. These documents will further detail how Policy 12 is to be implemented on individual planning applications, provide advice on onsite and off-site provision and explain when financial contributions would be sought. These documents will replace the 2004 Sports and Leisure Facilities SPG and 2005 Ready Reckoner, providing details on what developments should provide. The documents will be developed utilising the standards in Chapter 6 of the 2017 Assessment of Open Space, Sports and Recreation Needs for Aylesbury Vale (CD/SLB/001). In addition, an Aylesbury Vale Built Facilities Strategy and Aylesbury Vale Playing Pitch Strategy are being prepared for completion in early 2019.</u></p>
MM263, MM264, MM265, MM266 and MM267 not used			
MM268	260	12	<p><i>Delete and substitute;</i></p> <p><u>The council will support development proposals involving the provision of new sport and recreation facilities that are accessible by pedestrians and cyclists and public transport</u></p>

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			<p>where available and have no unacceptable impact upon the following:</p> <ul style="list-style-type: none"> a. <u>visual, noise or other impact on public amenity including safety</u> b. <u>the highway network,</u> c. <u>on wildlife and habitats</u> d. <u>the historic environment,</u> e. <u>flooding or drainage</u> <p><u>New housing development of more than 10 homes or which have a combined gross floorspace of more than 1,000 square metres (gross internal area) will be required to meet the Council's adopted standards in Appendix D to secure adequate provision of sports and recreation facilities increased capacity to meet the additional demand for sports and recreation facilities arising from new residential development. Facilities are required to be provided on-site except where off-site provision is acceptable according to the circumstances in Appendix D.</u></p> <p><u>Accessible natural green space required through Policy H7 will be treated separately to formal outdoor sports areas, equipped play facilities and allotment provision, which may be located within or outside such accessible natural green space, on land that is in addition to the accessible natural green space required under Policy I1.</u></p> <p><u>Conditions will be imposed on permissions or planning obligations sought in order to secure appropriate sport and recreation facilities reasonably related to the scale and kind of housing proposed. The recreational benefits to be obtained or provided by the Council by virtue of the obligation will be directly relevant to the development permitted and the needs of its occupiers and fairly and reasonably related to its scale and kind.</u></p> <p><u>Any proposals involving the loss of existing sports and recreation facilities will only be accepted where any of the following criteria are met:</u></p> <ul style="list-style-type: none"> f. <u>An assessment has been undertaken which has clearly shown the sports and recreation facilities are surplus to requirements and their loss is not detrimental to the delivery of the Playing Pitch Strategy or Built Facilities Strategy; or</u> g. <u>The development will significantly enhance the Open Space network as a whole and help achieve the Council's most recently adopted Green Infrastructure Strategy. In some cases, enhancements could be provided at nearby locations off site; or</u> h. <u>The loss of sports and recreation facilities would be replaced by equivalent or better provision in terms of quality and quantity in a suitable location; or</u> i. <u>The developments is for other types of sports or recreational provision or ancillary development associated with the Open Space and the needs for which clearly</u>

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			<p><u>outweigh the loss</u></p> <p><u>Sports and recreation facilities being provided must have a long term management and maintenance strategy agreed by the Council and shall set out details of the owner, the responsible body and how the strategy can be implemented by contractors.</u></p> <p><u>The policy applies to all types of sports and associated built facilities required for their operation or facilities of a more community nature where sports can take place within. This includes sports halls, swimming pools, community centres and village halls, artificial grass pitches (such as for football), grass playing pitches (such as for cricket), climbing walls, stadia and facilities for outdoor and indoor tennis, outdoor and indoor bowls, athletics, golf, health and fitness, squash and climbing walls.</u></p> <p><u>Formal outdoor sports areas providing facilities for football, netball, cricket, hockey, rugby and other sports should be treated separate to ANGSt so these areas can function to ensure financial sustainability. Facilities are usually hired for a fee and may include built facilities such as a pavilion or club house. Access is controlled and to maximise day time use the facility should ideally be colocated/shared with a school, college, community hall, sports club or other facility.</u></p>
MM269	262	11.17	<p><i>Amend;</i></p> <p>The Council will refuse <u>therefore generally aim to resist</u> proposals that would result in the erosion of <u>the valuable</u> community facilities and services <u>in the Vale</u>, unless it can be clearly demonstrated that there is no long-term requirement for their retention. In the case of a <u>proposal affecting a commercial venture which operates as a community facility,</u> the applicant will need to satisfy the Council <u>it is important to establish</u> that the existing use is no longer commercially viable and; <u>to prove that a genuine attempt has been made to market the enterprise as a going concern.</u></p>
MM270	262	To follow 11.19	<p><i>Add new paragraph;</i></p> <p><u>The Open Space, Sports, Recreation and Public Realm SPD will set out guidance for on or off site provision for open space, sports and leisure facilities (see Policy 12), public realm and also community facilities and community infrastructure required under Policy 13. The SPD will also set out any possible exceptions to on or off site provision.</u></p>
MM271	262	13	<p><i>Amend title, second paragraph and add third paragraph;</i></p> <p>13 Community facilities, <u>infrastructure</u> and assets of community value</p> <p><u>In considering applications for residential development, the Council will consider the need for new community facilities and community infrastructure arising from the proposal. Conditions will be imposed on permissions, or planning obligations sought in order to secure appropriate community</u></p>

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			<p>facilities, or financial contributions towards community facilities, reasonably related to the scale and kind of development proposed.</p> <p><u>A financial contribution will be required subject to compliance with the CIL Regulations to provide or enhance community facilities or community infrastructure on developments of more than 10 homes or which have a combined gross floorspace of more than 1,000 square metres (gross internal area).</u></p>
MM272	264	11.29	<p><i>Add to first sentence;</i> <u>(See Policy NE3)</u> <i>Delete remainder of paragraph</i></p>
MM273	265	11.30	<p><i>Delete paragraph and move footnote 50 to attach to policy I4(a)</i></p>
MM274	265	11.31	<p><i>Delete first two sentences and add;</i> <u>Planning</u></p>
MM275	265	I4	<p><i>Add to clause a;</i> <u>and for development sites located within 9m of any water courses (8m in the Environment Agency's Anglian Region)</u> <i>Amend clause b;</i> b. Other than sites allocated in the VALP, a<u>All development proposals must clearly demonstrate that the flood risk sequential test and sequential approach, as set out in the latest version of the SFRA, has been passed and be designed using a sequential approach, and</u> <i>amend preamble to Flood Risk Assessments;</i> <u>All development proposals requiring a Flood Risk Assessment in (a) above will assess all sources and forms of flooding, must adhere to the advice in the latest version of the SFRA and will:</u> <i>Amend clause d:</i> <u>provide level-for-level floodplain compensation and volume-for-volume compensation, up to the 1% annual probability (1 in 100) flood extent with an appropriate allowance for climate change, unless a justified reason has been submitted and agreed which may justify other forms of compensation</u> <i>Amend clause e;</i> e. ensure no increase in flood risk on site or harm to third parties elsewhere, such as downstream or upstream receptors, existing development and/or adjacent land and <u>ensure there will be no increase in fluvial and surface water discharge rates or volumes during storm events up to and including the 1 in 100 year storm event, with an allowance for climate change (the design storm event</u> <i>Insert new clause to follow clause e;</i> <u>not flood from surface water up to and including the design storm event, or any surface water flooding beyond the 1 in 30 year storm event, up to and including the design storm</u></p>

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			<p><u>event will be safely contained on site</u></p> <p><i>Amend clauses g and h;</i></p> <p>g. ensure development is safe from flooding for its lifetime <u>(and remain operational where necessary)</u> including an assessment of climate change impacts</p> <p>h. ensure development is appropriately flood resistant, resilient and safe <u>and does not damage flood defences but does allow for the maintenance and management of flood defences</u></p> <p><i>Delete clause i</i></p> <p><i>Add new clause after clause j;</i></p> <p><u>include detailed modelling of any ordinary watercourses within or adjacent to the site, where appropriate, to define in detail the area at risk of flooding and model the effect of climate change</u></p> <p><i>Add text following sub heading Sustainable Drainage Systems (SUDS);</i></p> <p><u>All development proposals must adhere to the advice in the latest version of the SFRA and will:</u></p> <p><i>Add to clause m (to become n);</i></p> <p><u>and complete site specific ground investigations to gain a more local understanding of groundwater flood risk and inform the design of sustainable drainage components</u></p> <p><i>Amend clause n (to become o);</i></p> <p>n. All development will be required to design and use sustainable drainage systems (SuDS) for the <u>effective management of surface water run-off on site</u>, as part of the submitted planning application <u>and not increase flood risk elsewhere, including sewer flooding</u>. All development should adopt exemplar source control SuDS techniques to reduce the risk of flooding due to postdevelopment runoff. SuDS design should follow current best practice (CIRIA Manual 2015 or as replaced) and Buckinghamshire County Council guidance on runoff rates and volumes to deliver wider environmental benefits. <u>Where the final discharge point is the public sewerage network the runoff rate should be agreed with the sewerage undertaker.</u></p> <p><i>Amend clause v (to become w);</i></p> <p>Compensation flood storage would need to be provided for <u>the built footprint as well as any land-raising within the 1 in 100 plus appropriate climate change flood event. This compensation would need to be demonstrated within a Flood Risk Assessment (FRA).</u></p>
MM276	268	15	<p><i>Amend title, second paragraph and clauses c and d;</i></p> <p><u>I5 Water resources and Wastewater Infrastructure</u></p> <p>The baseline position on water resources, quality and supply infrastructure, wastewater collection and treatment work capacity is set out in the Aylesbury Vale Water Cycle Study 2017. <u>On major developments where development could</u></p>

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			<p>have an impact on water resources and wastewater infrastructure capacity, early consultation is advised. Consultation will be required with either Anglian or Thames Water (whichever is appropriate) at the time a planning application is submitted (and evidence of this must be provided) to understand if the baseline position on water resources and wastewater has changed. Development proposals must meet all the following criteria:</p> <p>c. Planning applications must <u>demonstrate that adequate capacity is take into account the capacity available or can be provided within the foul sewerage network and at wastewater treatment works in time to serve the development.</u> At the Aylesbury, Buckingham, Great Horwood, Ivinghoe and Whaddon Wastewater Treatment Works, any application for an increased flow permit should be accompanied by a flood risk assessment to quantify whether the additional flow poses an increase in flood risk.</p> <p>Planning obligations Phasing</p> <p>d. Where appropriate, phasing of development will be used to enable the relevant water infrastructure to be put in place in time to serve development. <u>Conditions may be used to secure this phasing.</u> and planning obligations will be used to secure contributions to capacity improvements required as a result of development.</p>
MM277	272	Preceding Glossary	<i>Add new Appendix A; Housing Trajectory (Appended at end of these Modifications)</i>
MM278	272	Preceding Glossary	<i>Add new Appendix B; Parking standards (Appended at end of these Modifications)</i>
MM279	272	Preceding Glossary	<i>Add new Appendix C; Standards for Accessible Natural Green Space</i>
MM280	272	Preceding Glossary	<i>Add new Appendix D; Standards for Sport and Recreation</i>
MM281	272	Preceding Glossary	<i>Add new Appendix E; Summary list of Supplementary Planning Documents</i>
MM282	272	Preceding Glossary	<i>Add new Appendix F; Schedule of Saved Policies replaced by VALP and insert cross reference in paragraph 1.1</i>
MM283	274	Glossary	<p><i>Add;</i></p> <p><u>Defined Town Centres</u> – A locally designated area which defines the extent of a town centre. The defined town centres of Aylesbury Vale are located in Aylesbury, Buckingham, Winslow and Wendover respectively. The extent of the defined town centres are specified on the policies maps. The Buckingham town centre extent is based on the town centre boundary in the made Buckingham Neighbourhood Development Plan. The Winslow town centre extent is based on the Central Shopping Area extent in the Winslow Neighbourhood Plan. The Wendover town centre extent is based on the defined Central Shopping Area in the Aylesbury Vale District Local Plan (2004).</p>

Ref	Page	Policy/ Paragraph	Main Modification
MM284	284	Submission Policies map	<i>Add strategic infrastructure (HS2, East-west rail, Aylesbury link roads). Shift order of layers and darken the colour of the 'commitments' layer</i>
MM285	286	Aylesbury Inset Map	<p><i>Add strategic infrastructure (HS2, East-west rail). Add Halton Brook Business Park as key employment area</i></p> <p><i>Extend Arla key employment site extent to cover the adjoining commitments and part of EZ.</i></p> <p><i>Re-adjust northern boundary of AGT1.</i></p> <p><i>Added Enterprise Zones as separate map layer. Added extents for Westcott Venture Park EZ, Arla/Woodlands EZ and Silverstone Park EZ.</i></p> <p><i>Amended depiction of Aylesbury Transport Hub on policies maps.</i></p> <p><i>Extent of AGT2 altered.</i></p> <p><i>Amendment to Gatehouse Industrial Estate key employment site to exclude planning references 18/02217/COUOR and 16/03499/COUOR.</i></p> <p><i>Align area of 'not built development' within AGT3 to match area of Flood Zone 2,3a and 3b</i></p> <p><i>Add C2 use allocation.</i></p> <p><i>Add AONB</i></p> <p><i>Indicative road links added</i></p>
MM286	287	Central Aylesbury Inset map	<p><i>Extent of D7 to be amended.</i></p> <p><i>Delete site AYL077 as a housing allocation.</i></p> <p><i>Add Stocklake Link Urban section</i></p>
MM286A	288	Biddlesden	<i>Add; HS2 route</i>
MM287	290	Buckingham and Maids Moreton Inset Map	<p><i>Delete site BUC051 as a housing allocation.</i></p> <p><i>Add new commitment for 12 homes at Scotts Farm, Towcester Road (planning reference 16/02669/AOP) to west of site MMO006.</i></p> <p><i>Changed BUC039 from 'committed site' to 'neighbourhood plan allocation'.</i></p> <p><i>Move extent of Network 421 to west of Radclive Road.</i></p> <p><i>Extent of allocation MMO006 amended to match extent of outline planning application with reference 16/00151/AOP, which has a resolution to grant permission subject to Section 106 Agreement.</i></p> <p><i>Extent of 'Not built development' on allocation MMO006 amended to match the Illustrative Landscape Masterplan as submitted by applicants for outline planning application with reference 16/00151/AOP.</i></p>
MM288	291	Cuddington Inset Map	<i>Extent of allocation CDN001 amended to match extent of outline planning application with reference 18/00137/APP, which now has permission granted.</i>
MM289	293	Haddenham	<i>Amend site HAD005 to reflect 16/04575/ADP planning</i>

Ref	Page	Policy/ Paragraph	Main Modification
		Inset Map	<i>permission. Update commitments</i>
MM290	294	Halton Inset Map	<i>Omit Halton Brook Business park</i>
MM291	295	Ickford Inset Map	<i>Extent of allocation ICK004 amended to match extent of outline planning application with reference 17/02516/AOP, which now has permission granted. Add commitment 17/03322/AOP.</i>
MM292	297	Marsh Gibbon Inset Map	<i>Delete inset map</i>
MM293	298	Milton Keynes, Bletchley & Newton Longville inset map	<i>Retitle; Northeast Aylesbury Vale. Add East West Rail route. Add WHA001 allocation and potential A421 dualling</i>
MM293A	300	Pitstone inset map	<i>Identify neighbourhood plan allocations</i>
MM293B	301	Quainton inset map	<i>Add further commitments. Add HS2 route, East-West Rail route and road realignments</i>
MM294	302	Silverstone inset map	<i>Remove Key Employment Site extent outside of the Silverstone Park EZ extent</i>
MM294A	304	Soulbury inset map	<i>Add commitments</i>
MM295	305	Steeple Claydon Inset Map	<i>Amend SCD008 from allocated site to neighbourhood plan allocation. Add commitments</i>
MM296	306	Stoke Hammond inset map	<i>Add commitments</i>
MM297	307	Stone inset map	<i>Add commitments</i>
MM298	308	Waddesdon inset map	<i>Add commitments, HS2 route and amend boundary of neighbourhood plan allocation</i>
MM299	After 308	Wendover inset map	<i>Add inset plan of town centre boundary</i>
MM300	309	Wendover Road inset map	<i>Add HS2 route and commitments</i>
MM301	310	Westcott inset map	<i>Distinguish Enterprise Zone from employment site</i>
MM302	311	Whitchurch inset map	<i>Add commitments</i>
MM303	312	Winslow	<i>Add East West Rail route, town centre boundary, C2 use</i>

Ref	Page	Policy/ Paragraph	Main Modification
		inset map	<i>allocation and distinguish neighbourhood plan allocations from commitments</i>

Table 1 to be inserted in MM 11

Table 1 Spatial strategy for growth in Aylesbury Vale

Category	Settlement	Completions 2013 - 2020	Commitments as at March 2020	Completions and Commitments 2013-2020	Allocations in this plan	Total development
Strategic settlements	Aylesbury	5,604	7,321	12,925	3,282	16,207
Strategic settlements	Buckingham	1,005	622	1,627	550	2,177
Strategic settlements	Haddenham	408	674	1,082	0	1,082
Strategic settlements	Wendover / Halton Camp	135	7	142	1,000	1,142
Strategic settlements	Winslow	277	278	555	315	870
North east Aylesbury Vale	North east Aylesbury Vale	275	1,931	2,206	1,150	3,356
Larger villages	-	1,108	1,274	2,382	26	2,408
Medium villages	-	478	906	1,384	39	1,423
Smaller villages and other settlements	-	423	286	709	No allocations made at these locations	709
Windfall	-					760
Total	-	9,713	13,299	23,012	6,362	30,134 ⁵

⁵ This represents a 5.4% buffer on top of the total housing requirement made up of Aylesbury Vale's objectively assessed need and the unmet need from other authorities (28,600).

Table 2 to be inserted in MM12

Table 2 Proposed settlement hierarchy and housing development

Category	Description	Settlements	Total housing development	Completions and commitments	Allocations
Strategic settlements	The most sustainable towns and villages in Aylesbury Vale and the focus for the majority of development. These settlements act as service centres for other villages around them. The plan will allocate sites at strategic settlements	Aylesbury Buckingham Haddenham Wendover/Halton Camp Winslow	16,207 ⁶ 2,177 1,082 1,142 870 (TOTAL 21,478)	12,925 1,627 1,082 142 555	3,282 550 0 1,000 315
North east Aylesbury Vale	Allocation of land adjoining Milton Keynes that falls within Aylesbury Vale district	Sites within the parishes of Newton Longville , Stoke Hammond and Whaddon.	3,356	2,206	1,150
Larger villages	Larger, more sustainable villages that have at least reasonable access to facilities and services and public transport, making them sustainable locations for development. The plan allocates sites at some of the larger villages	Aston Clinton Edlesborough Ivinghoe Long Crendon Pitstone Steeple Claydon Stoke Mandeville Stone (including Hartwell) Waddesdon (including Fleet Marston) Whitchurch Wing Wingrave	624 179 25 109 194 301 375 68 196 92 130 115 (TOTAL 2,408)	624 179 25 109 194 301 375 42 196 92 130 115	0 0 0 0 0 0 0 26 0 0 0 0
Medium villages	Medium villages have some provision key services and facilities, making them moderately sustainable locations for development. The plan allocates some sites at medium villages	Bierton (including Broughton) Brill Cheddington Cuddington Gawcott Great Horwood Grendon Underwood Ickford Maids Moreton Marsh Gibbon Marsworth Newton Longville North Marston	27 11 115 28 15 81 59 100 188 62 36 52 9 52	27 11 115 13 15 81 59 100 188 62 36 52 9 52	0 0 0 15 0 0 0 0 0 0 0 0 0 0

⁶ This includes some figures for Stoke Mandeville, Bierton and Weston Turville parishes.

Category	Description	Settlements	Total housing development	Completions and commitments	Allocations
		Padbury Quainton Stewkley Stoke Hammond Tingewick Weston Turville (TOTAL 1,423)	108 98 194 110 78 (TOTAL 1,423)	84 98 194 110 78	24 0 0 0 0
Smaller villages	Smaller, less sustainable villages which have relatively poor access to services and facilities. It is expected that some small scale development could be accommodated at smaller villages without causing unreasonable harm. This level of development is also likely to help maintain existing communities. Sites at smaller villages will come forward either through neighbourhood plans or by individual 'windfall' planning applications, no site allocations are made at smaller villages	Total (smaller villages and other settlements)	709	709	0
Smaller villages	List of smaller villages where housing is expected to come forward through neighbourhood plans or through the development management process considered against relevant policies in the Plan.	Adstock Akeley Ashendon Aston Abbotts Beachampton Bishopstone Buckland Calvert Green Chackmore Charndon Cheersley Chilton Cublington Dagnall Dinton Drayton Parslow East Claydon Ford Granborough Great Brickhill Halton Hardwick			

Category	Description	Settlements	Total housing development	Completions and commitments	Allocations
		Ivinghoe Aston Little Horwood Ludgershall Mentmore and Ledburn Mursley Nash Northall Oakley Oving (including Pitchcott) Preston Bissett Shabbington Slapton Soulbury Stowe and Dadford Swanbourne Thornborough Turweston Twyford Weedon Westbury Westcott Whaddon Worminghall			
Other settlements	The remainder of settlements in Aylesbury Vale which are not sustainable locations for development and are places where it is likely that any development would cause harm to the local environment. No allocations for housing will be made and only a very limited amount of development is expected to come forward through neighbourhood plans or through the development management process considered against relevant policies in the Plan	Addington Biddlesden Boarstall Broughton Burcott Chetwode Dorton Drayton Beauchamp Edgcott Hillesden Kingsey Kingswood Leckhampstead Lillingstone Dayrell Lillingstone Lovell Luffield Abbey Middle Claydon Nether (Lower) Winchendon Poundon Radclive Rowsham Shalstone Thornton Upper Winchendon Upton Water Stratford Wotton Underwood			

Table 8 to be inserted in MM25A

Table 8 Historic windfall completion rates on sites with fewer than five dwellings

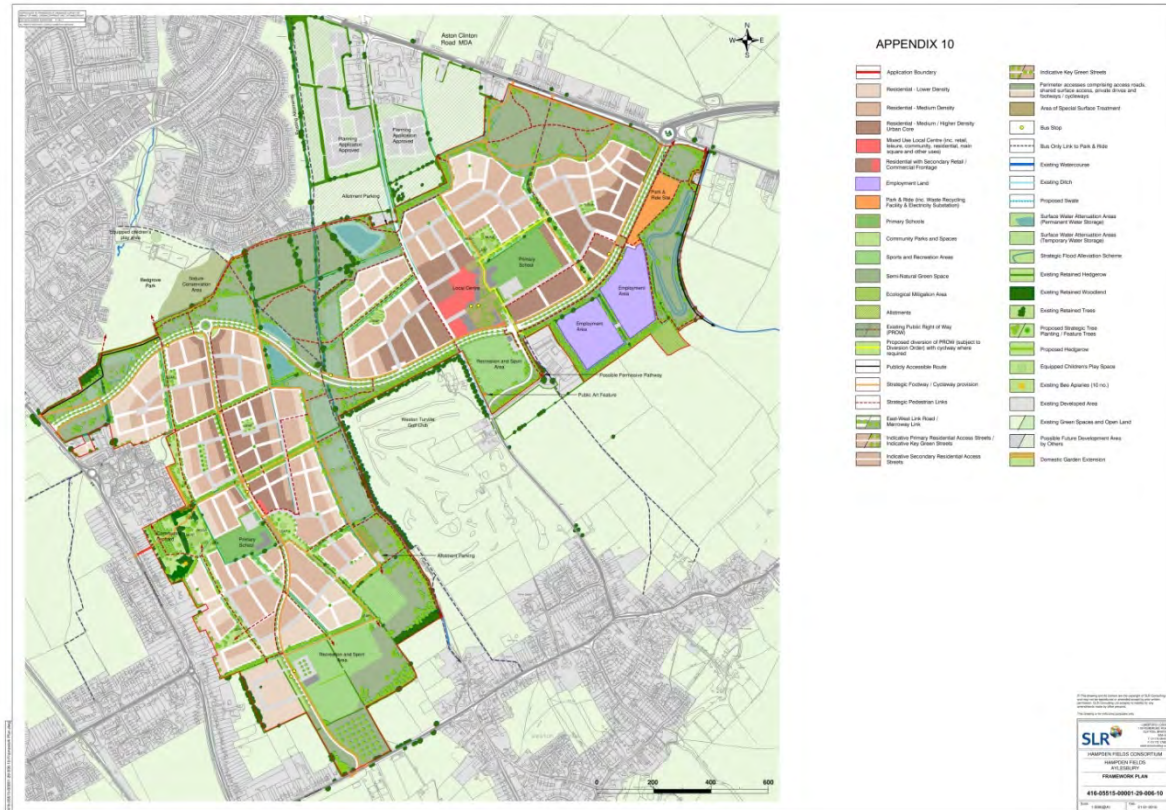
Year	Completions on small windfall sites (fewer than five dwellings) net (excluding residential gardens)
2010/11	29
2011/12	66
2012/13	55
2013/14	84
2014/15	82
2015/16	81
2016/17	94
2017/18	86
2018/19	94
2019/20	86
Average	76

Concept plan to be included in MM48

D-AGT3 Woodlands (MM48)



D-AGT4 Hampden Fields (MM55)



Concept Plans to be included in MM61

D-AGT6 Kingsbrook village 3 phase 1 (MM61)



Village 3 phases 2a and 2b

D-AGT6 Kingsbrook village 3 phases 2a and 2b (MM61)



Village 3 phase 3

D-AGT6 Kingsbrook village 3 phase 3 (MM61)



Village 3 phase 4

D-AGT6 Kingsbrook village 3 phase 4 (MM61)



D-AGT6 Kingsbrook village 4 (MM61)



D-NLV001 (MM74)



Table 14 to be inserted in MM158

Table 14 Types of older people accommodation

Housing Type	Characteristics of population	Typical design and facility requirements	Typical service provision	Use Class
Retirement Accommodation	Independent population.	Self contained accessible accommodation. A sustainable location in terms of access to local amenities and services. Built to meet lifetime homes standards. Guest room providing at least two bedrooms in each unit.	Community Alarm. Visiting warden/scheme manager service on demand, floating support service.	Typically C3, dependent on number of hours or type of service offered termed 'extra care' Domiciliary care on site or visiting.
Conventional Sheltered Housing	Independent population. Capacity to cope with occasional care needs.	En-suite private accommodation. High standard of accessibility internal and external. Guest room. Enhanced communal facilities: e.g. craft facilities, IT suite, etc. Infrastructure in place for assistive technology. Generous storage space in addition to that within the individual unit.	Facilitated access to care services. Dedicated warden/scheme manager service. Facilitated social and recreational activity programme, floating support service.	Typically C3, dependent on number of hours or type of service offered termed 'extra care' Domiciliary care on site or visiting.
Enhanced Sheltered Housing	Mixed dependency population. Including up to 12 hrs per week care needs.	Assisted bathing facilities. Access to meals service. Recreational/Leisure facilities. Infrastructure in	Manager based on site to provide support and facilitate access to day opportunity services.	C2

Housing Type	Characteristics of population	Typical design and facility requirements	Typical service provision	Use Class
	Aggregate care needs 150-200 hrs per week.	place for assistive technology. Guest accommodation. Restaurant. Fully equipped craft rooms. IT Suite. Exercise suite. Generous storage space in addition to that within the individual unit.	Expedited access to care services. Facilitated social and recreational activity programme. On site care and/or support.	
Extra Care Sheltered Housing	Mixed dependency population, around 1/3rd having care needs in excess of 18 hrs care per week. 1/3rd low care needs. 1/3rd no current care needs. Aggregate care needs at least 240 hrs per week. Existing residents supported in extreme frailty. Some residents with moderate levels of dementia.	En-suite one bedroom accommodation. Restaurant. Fully equipped craft rooms. IT Suite. Exercise suite. Daytime activities. Scheme design encourages orientation. Infrastructure in place for assistive technology and some utilisation of assistive technology. Generous storage space in addition to that within the individual unit. Communal facilities available.	Manager based on site to provide support and co-ordination 24/7 on site care. Facilitated recreation, social, cultural programme. Access to nursing/ wellbeing services. Access to dementia services.	C2
Registered Care Home	Minimum care needs 18 hrs per week up to	In space and design standards meeting the	In staffing levels and practice meeting the	C2

Housing Type	Characteristics of population	Typical design and facility requirements	Typical service provision	Use Class
	highest level of personal care short of nursing. Capacity to cope with highest levels of physical and mental frailty.	requirements of the Commission for Social Care Inspection. Infrastructure for assistive technology and some utilisation of assistive technology. Exceeding the minimum space standards and with additional facilities to enrich the life experience of residents. Guest accommodation.	requirements of the Commission for Social Care Inspection. Evidence of highest professional practice and staffing to support life enrichment for residents.	

New policy H6b to be inserted in MM159

Class C2 older persons' provision will be met in the following ways:

1. The following sites are allocated for the development of older persons C2 accommodation between 2020 and 2025:

Table 15 Older person C2 accommodation allocations

Site	Site area (ha)	Units (approx)
i. WIN026 - Winslow Centre for 83 C2 older persons' housing (53 additional units on top of existing neighbourhood plan commitment) as part of wider redevelopment of existing site for community facilities (NB partly on Local Green Space)	2.4	53
ii. WHA001 - Shenley Road, Whaddon (Shenley Park)	55 (1ha for C2)	110
iii. Adjacent to Tesco, Tring Road, Aylesbury	0.5	58
iv. Fremantle Court, Risborough Rd, Stoke Mandeville adjacent to an existing facility providing sustainable transport and a designated nature reserve	0.38	100
v. Mandeville Grange Nursing Home, Wendover Road, Stoke Mandeville reflecting unimplemented permission for 16 bed extension	1	16
vi. Land adj to Martin Dalby Way/Paradise Orchard, Berryfields (19/02210/APP resolution to approve)	0.35	60
vii. Bartletts Residential Home, Peverel Court, Portway Road, Stone - providing 12 extra beds at the existing facility	1	12
viii. Land north of Aston Clinton Road, Weston Turville (care home) increasing provision on permitted site from 80 to 85 beds	1.3	5
Total	19.41	414

2. The following broad locations are identified as containing suitable sites for the provision of C2 accommodation for older people between 2025 and 2033:
 - a. Aylesbury town centre e.g. former HSBC bank, Walton Grove
 - b. Aylesbury key employment sites e.g. Gatehouse Employment Area, Gatehouse Way
 - c. Aylesbury other employment sites e.g. adjacent to Berryfields Neighbourhood Centre
 - d. Suitable housing or employment sites identified in the HELAA
3. Proposals for C2 older people accommodation will be granted permission provided the following criteria are met:
 - a. The proposal is in a sustainable location for amenities and services
 - b. There is an identified package of care provision on site
 - c. Minimum Clinical Commissioning Group inspected space standards are met or exceeded

- d. Facilities for social and recreational activity are provided
- e. Guest accommodation is provided (unless the proposal is for Extra Care Sheltered accommodation)

Table to be inserted in Modification MM210

Table 17 Protected and supported transport schemes

Settlement	Evidence Base	Required Mitigation Measures	Delivery Partner	Delivery Mechanism /Funding
Aylesbury	Kingsbrook Masterplan/Aylesbury Transport Strategy	Stocklake improvement (rural section) and Eastern Link Road (N)	BC, Developer	Developer contributions
Aylesbury	Kingsbrook and Woodlands Masterplans/Aylesbury Transport Strategy	Aylesbury, Eastern Link Road (S)	Bucks Advantage/Developer	Developer contributions/BC Capital Fund/LGF
Aylesbury	Buckinghamshire County Model/Aylesbury Transport-Strategy	Southern Link Road (dual carriageway between A41 and A413)	BC, developers	Developer contributions
Aylesbury	Buckinghamshire County Model/Aylesbury Transport Strategy/HS2 Hybrid Bill	Stoke Mandeville A4010 Realignment	HS2	HS2
Aylesbury	Buckinghamshire County Model/Aylesbury Transport Strategy/DfT Retained scheme	South East Aylesbury Link Road (A413 to B4443 Lower Road) (SEALR)		Developer contributions/HS2/LGF
Aylesbury	Buckinghamshire County Model/Aylesbury Transport Strategy	South East Aylesbury Link Road Phase 2 (dualling of link between SW Aylesbury Link Road and Lower Road)	HS2/BC	HS2/Developer contributions/BC
Aylesbury	Buckinghamshire County	South West link (between Stoke	Developer	Developer contributions

Settlement	Evidence Base	Required Mitigation Measures	Delivery Partner	Delivery Mechanism /Funding
	Model/Aylesbury Transport Strategy	Mandeville A4010 realignment and A418)		
Aylesbury	Aylesbury Transport Strategy-	Priority Public Transport Corridor A41 Bicester Road	BC	Developer contributions
Aylesbury	Aylesbury Transport Strategy	Priority Public Transport Corridor A41 Tring Road	BC	Developer contributions
Aylesbury	Aylesbury Transport Strategy/Aylesbury Garden Town	Aylesbury town centre improvements to the pedestrian network and public realm: a. Cambridge Street b. Exchange Street c. Friarage Road d. Vale Park Drive e. Upper Hundreds Way f. Walton Street g. Canal Basin h. Town Centre cycle parking	BC	Developer contributions / grants
Aylesbury	Aylesbury Transport Strategy	Remodelling the bus station to increase capacity and reconfiguring of the pedestrian access between the railway station/bus station and town centre.	BC/EWR/Developers	EWR Consortium/DfT/Network Rail/BC/CIL/Other
Aylesbury	Aylesbury Transport Strategy	Aylesbury town-wide cycle network improvements	BC, Sustrans	Developer contributions
Aylesbury	National	East West Rail –	NIC	EWR

Settlement	Evidence Base	Required Mitigation Measures	Delivery Partner	Delivery Mechanism /Funding
	Infrastructure Commission "Partnering for Prosperity: A new deal for the Cambridge Milton Keynes-Oxford Arc"	Bicester, to Winslow, MK and Aylesbury. Includes new station at Winslow.		Consortium/DfT/Network Rail/BC/CIL/Other
Aylesbury	Aylesbury Transport Strategy	Traffic calming on Prebendal Avenue to reduce rat-running between A418 and Stoke Road	BC/Developers	Developer contributions/CIL/Other
Buckingham	Buckingham Transport Strategy	Route upgrade on the A421 and A413 to dual – 2 lane standard (between Radcliffe Road roundabout and A421/A413 roundabout (east))	Developers	Developer contributions and grant funding
Buckingham	Buckingham Transport Strategy	Buckingham Left turn slip at A422/A413/Stratford Road roundabout	Developers	Developer contributions
Buckingham	Buckingham Transport Strategy	Buckingham Town-wide cycle network improvement	BC, Sustrans	Developer contributions
Buckingham	Buckingham Transport Strategy	Buckingham to Silverstone Park cycle route	BC, Sustrans	Developer contributions
Winslow	Buckingham Transport Strategy	Infrastructure to facilitate increase in bus frequency to Winslow Station	BC, Bus operators, EWR Alliance	Operators – possible commercial service
Edge of MK (North	Buckinghamshire County Model	New roundabout access on A421 to	MK, BC, developers	Developer contributions

Settlement	Evidence Base	Required Mitigation Measures	Delivery Partner	Delivery Mechanism /Funding
East Aylesbury Vale)		serve Shenley Park and subject to more detailed traffic modelling possible dualling between new access and Bottledump roundabout and link road through the site connecting the A421 with H6 and/or H7		

Table to be inserted in Modification MM212

Table 18 BCC guidelines for Transport Assessment thresholds

Land Use	Smaller Developments	Major Development
	Require a Transport Statement	Require a Transport Assessment and Travel Plan
B2 General industrial	2500-4000 sqm	>4000 sqm
B8 Storage of distribution	3000-5000 sqm	>5000 sqm
C1 Hotels	75-100 bedrooms	>100 bedrooms
C2 Residential institutions – hospitals, nursing homes	30-50 beds	>50 beds
C2 Residential institutions – residential education	50-150 students	>150 students
C2 Residential institutions – hostels	250-400 residents	>400 residents
C3 Dwelling houses	50-80 units	>80 units
E(a) Display or retail sale of goods, other than hot food	250-800 sqm	>1500 sqm
E(b) Sale of food and drink for consumption (mostly) on the premises	300-1500 sqm	>1500 sqm
E (c)(i) Financial services,	1000-2500 sqm	>2500 sqm
E (c)(ii) Professional services (other than health or medical services)	1000-2500 sqm	>2500 sqm

Table to be inserted in modification MM217

Table 19 Electric Vehicle charging requirements

Development	Requirement
Houses*	One electric vehicle dedicated charging point per house with garage or driveway
Flats **	At least 10% of parking bays*** shall be provided with dedicated electric vehicle charging points. All other parking spaces to be provided with passive wiring to allow future charging point connection.
Other Development (<50 Bays)**	At least two parking bays *** shall be marked out for use by electric vehicles only, together with charging infrastructure and cabling
Other Development (>50 Bays)**	Further dedicated bays (3m x6m) totalling 4% of the total provision.
Phasing	If a development requires a phasing plan over a number of years the developer will be required to enter into negotiation with the local authority to make provision for the installation of groundwork / passive wiring in order to enable further future installation to match demand.

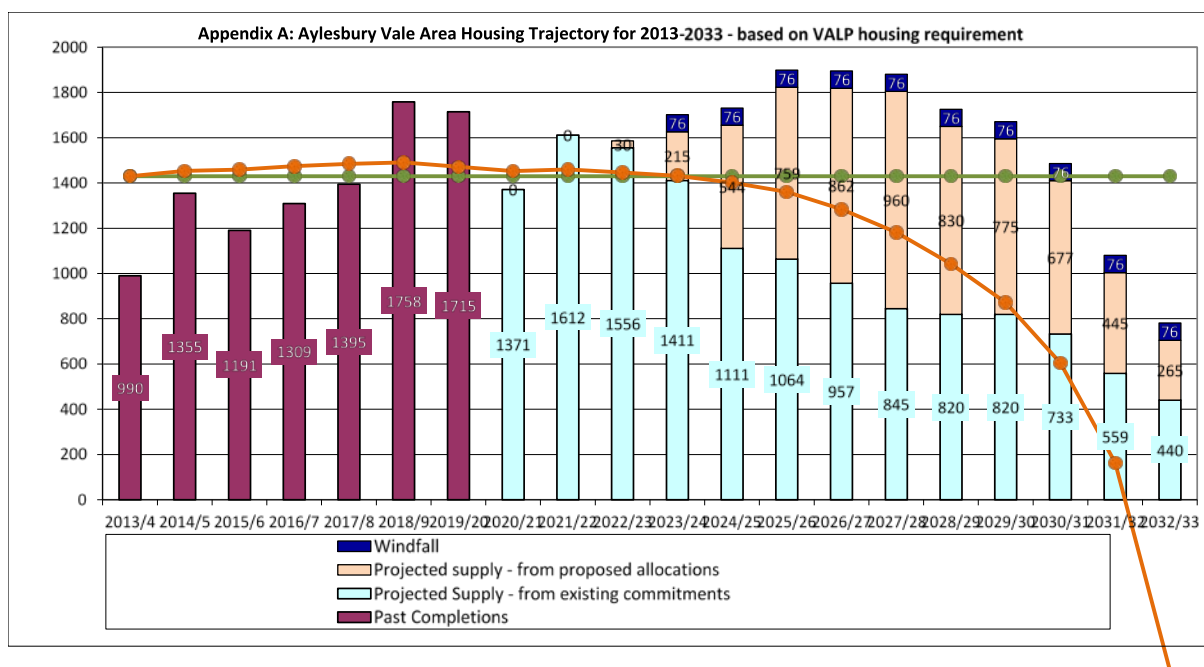
Appendix A referred to in Modifications MMs23 and 277

Table 1: Housing trajectory overview table

	2013/4	2014/5	2015/6	2016/7	2017/8	2018/9	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	TOTAL
Past Completions	990	1355	1191	1309	1395	1758	1715														9713
Projected Supply - from existing commitments								1371	1612	1556	1411	1111	1064	957	845	820	820	733	559	440	13299
Projected supply - from proposed allocations								0	0	30	215	544	759	862	960	830	775	677	445	265	6362
Windfall											76	76	76	76	76	76	76	76	76	76	760
Total Past Completions	990	1355	1191	1309	1395	1758	1715														
Total Projected Completions								1371	1612	1586	1702	1731	1899	1895	1881	1726	1671	1486	1080	781	20421
VALP Target	1430	1430	1430	1430	1430	1430	1430	1430	1430	1430	1430	1430	1430	1430	1430	1430	1430	1430	1430	1430	28600
VALP Target - Cumulative	1430	2860	4290	5720	7150	8580	1000	11440	12870	14300	15730	17160	18590	20020	21450	22880	24310	25740	27170	28600	
Cumulative Completions	990	2345	3536	4845	6240	7998	9713	11084	12696	14282	15984	17715	19614	21509	23390	25116	26787	28373	29353	30134	
Number dwellings above or below cumulative target	-440	-515	-754	-875	-910	-582	-297	-356	-174	-18	254	555	1024	1489	1940	2236	2477	2533	2183	1534	

	2013/4	2014/5	2015/6	2016/7	2017/8	2018/9	2019/0	2020/1	2021/2	2022/3	2023/4	2024/5	2025/6	2026/7	2027/8	2028/9	2029/0	2030/1	2031/2	2032/3	TOTAL
Annual requirement taking account of past/projected completions	1430	1453	1459	1474	1485	1491	1472	1453	1460	1446	1432	1402	1361	1284	1182	1042	871	604	164	-753	

Chart 1: Housing trajectory diagram



Appendix B referred to in Modifications MM214 and MM278

1. Residential Car Parking Standards

The standards set out below in Table 1 have been evidenced using the Buckinghamshire Countywide Parking Standards (former Buckinghamshire County Council, September 2015) as a basis and updated to reflect local circumstances in relation to recently approved developments, best practice and accessibility.

Table 1 - Residential Car Parking Standards

Bedroom numbers	Standards (optimum)	Exception
1 (Bedsits/studios are included in the 1 bedroom category.)	1.5 spaces	1 space per dwelling plus one visitor's space for every two dwellings
2	2 spaces	
3	2.5 spaces	2 spaces per dwelling plus one visitor's space for every two dwellings
4	3 spaces	
5 +	3.5 spaces	3 spaces per dwelling plus one visitor's space for every two dwellings

Note

1. The car parking standards set out here are optimum standards; the level of parking they specify should be provided within the curtilage unless specific local circumstances can justify deviating from them. Proposals for provision above or below this standard must be supported by evidence detailing the local circumstances that justify the deviation. This evidence must be included in (and/or consistent with) the developer's Travel Plan and Transport Assessment.
2. Houses in Multiple Occupation (HMOs) and converted student accommodation - there should be provision for parking spaces in line with other residential dwellings. As with all developments the standards allow for flexibility where there is evidence that they would not be appropriate. Where a local planning authority considers that

other rooms are likely to be used as bedrooms, they may wish to consider including these within the calculation for parking provision.

3. Studies, other than those on ground floors, will be regarded as bedrooms.

Where there are changes to existing properties such as extensions and garage conversions, developers will be required to provide sufficient parking to meet the above standards based on the standards specified. It will be the developer's responsibility to make sure that the changes made to an existing property will not prejudice the retention of adequate parking within the curtilage of the property.

2. Non-residential car parking standards

Non-residential car parking standards have been derived using TRICS. Table 2 sets out the resulting standards. Each use class parking standard is based on Gross Floor Area (GFA), or by staff/consultation room where indicated. Due to the limitations of the data available to us, there are a number of exceptions to these standards, and these are outlined in Table 2 below.

Table 2 - Non-residential Car Parking Standards

Land use – new developments	Standards
E. Retail (GFA < 1000 sqm) See additional guidance below.	1 space per 23 sqm
E. Non-food retail (GFA >1000 sqm) See additional guidance below.	1 space per 38 sqm
E. Food retail (GFA > 1000 sqm) See additional guidance below.	1 space per 17 sqm
Retail warehouses (DIY, Garden Centre)	1 space per 67 sqm
Retail warehouse w/o garden centre	1 space per 65 sqm
E. Financial and professional services	1 space per 25 sqm
E. Restaurant – single	1 space per 16 sqm
E. Public houses, restaurant	1 space per 17 sqm
E/ Sui Generis Pub restaurants + hotel	Case by case
Sui Generis Public houses without restaurant (although site may sell bar food)	1 space per 25 sqm
Sui Generis Takeaways	1 space per 23 sqm
Business	
E. Business – offices See additional guidance below.	1 space per 25 sqm
B2. General Industrial	1 space per 64 sqm
B2. Industrial Estate	1 space per 87 sqm
B8. General Warehouse, Industrial Units (Please see additional guidance below on servicing arrangements and operational guidance.)	1 space per 130 sqm
Other use classes	
C1. Hotels and hostels	1 space per bedroom
C2. Hospitals	Case by case
C2. Care Homes	1 space per 3 residents
Retirement flats	1 space per 4 units (unallocated)
F1. Art galleries/museums	1 space per 89 sqm
F1. Exhibition centre	1 space per 25 sqm

Land use – new developments	Standards
F1. Place of worship/public assembly buildings	1 space per 25 sqm
E. Health surgeries, nurseries	1 space per 20 sqm
F1. Primary schools See additional guidance below.	1 space per f.t.e staff
F1. Secondary schools See additional guidance below.	1 space per f.t.e staff
F1. Higher, further education, college	1 space per 1 ft.e staff + student parking to be assessed individually
F1. Library	1 space per 50 sqm
E. Bingo Hall	1 space per 21 seats
E. Cinema	1 space per 12 seats
E/ F2. Leisure Centre – swimming pool	1 space per 62 sqm
Tennis courts	2 spaces per court or individual assessment
E/B2. Motorist centre/car servicing	1 space per 53 sqm
B2. Repair Garage	1 space per 35 sqm
Sui Generis. Theatres	1 space per 12 seats

Note

1. The car parking standards set out here are optimum standards; the level of parking they specify should be provided unless specific local circumstances can justify deviating from them. Proposals for provision above or below this standard must be supported by evidence detailing the local circumstances that justify the deviation. This evidence must be included in (and/or consistent with) the developer's Travel Plan and Transport Assessment.

Additional guidance

E shops – In all cases, adequate provision should be made for the parking and turning of service vehicles serving the site, off the highway.

E Business – These optimum standards are designed to provide an appropriate level of parking across the county. However recent developments suggest higher levels may be required in certain areas. This may be due to specific to local circumstances and/or the geography of Aylesbury Vale. Where this is the case, the flexibility allowed by the standards should be applied.

Shared use facilities – When a use forms part of a shared use facility, parking standards must be looked at for all uses and the appropriate amounts supplied. For example when conference facilities are included in a hotel facility, appropriate parking standards must be applied for each use.

All schools and colleges - All school and colleges should provide appropriate drop off areas as well as car parking. Drop offs can reduce the need for parking, improve circulation and ultimately reduce congestions problems on local roads around the school.

Secondary schools – where there is a 6th form, student parking should be assessed individually.

Residential schools – to be assessed individually.

Warehouse – Consideration should be given to the requirement for overnight parking and facilities. Also due to variability of the sites, the standard will need to be considered carefully and greater flexibility may be needed here.

Parking For Service Vehicles - The provision of spaces for goods vehicles to load and unload will be assessed for each development proposal on its merits. Car sales/showrooms

will be expected to ensure that deliveries by car transporters can be appropriately accommodated.

Converted Care home/sheltered housing accommodation - Where properties are converted into care homes/sheltered housing accommodation, developers will need to agree with the local planning authority (following appropriate discussion with BC).

Hospitals – Due to the complexity of parking requirements in relation to staff management, patient and visitor demand and differing needs from each service it is prudent to consider parking on a case by case basis. A number of points should be considered when determining parking requirements, including existing issues such as lack of capacity, overspill and neighbourhood issues; existing parking provisions; use and demand; long term development plans; accessibility by public transport; the overall sustainability and accessibility of the site; type of hospital; and number and timing of users. Where applications are made for ‘open’ class E uses, the highest parking standard for uses in that class will be utilised.

3. Cycle Parking Standards

There is a variety of guidance available on the design and layout of cycle parking. Sustrans (2004) provides extensive information on the location, design, and amount of cycle parking. This takes into account the importance of ensuring cycle parking is safe and secure, attractive, accessible and convenient to the user. Cycle parking for flatted development will be positioned to ensure it is covered, secure and overlooked. For houses, cycle parking is normally accommodated in a garage or a shed within the curtilage of the property. Table 3 below outlines the standards for cycle parking.

Table 3 - Cycle Parking Standards

Land use - new developments	Required number of cycle space(s)
Residential dwelling (Flats)	Where no garage or other suitable accommodation is provided at least one secure cycle space per residential
Elderly persons/sheltered accommodation	1 space per 10 residents, plus 1 space per 5 staff on duty
Multiple occupancy	0.5 spaces per bedroom, plus 1 visitor space per 10 bedrooms
E. Retail	3 spaces per 150 sqm (1000sqm)
B8. Storage/distribution warehouse	1 space per 500 sqm up to 10,000 sqm. After 10,000sqm, 1 additional space per 20,000 sqm
Garden centre	Case by case
E. Food and drink (inc pub, restaurant)	1 space per 100 sqm
E. Business offices	1 space per 250 sqm
Industrial unit	1 space per 500 sqm
Industrial estate	1 space per 500 sqm
C1. Hotel and hostels	1 space per 15 bedrooms plus 1 space per 7 staff
E. Surgeries/health centres	1 space per 5 staff
Sui Generis/ E Assembly and leisure: Theatres, cinema	1 space per 100 seats
E/ F2. Leisure centres/ pools	1 space per 400 sqm
Schools (Please note, standards reflect use of scooters plus bikes)	
F1. Primary	1 space per 10 staff and students

Land use - new developments	Required number of cycle space(s)
F1. Secondary	1 space per 7 staff and students
F1. Colleges	1 space per 20 full time staff and students
F1. Libraries	1 space per 200 sqm
Bus station	Case by case
Train station	Case by case

Where applications are made for 'open' class E uses, the highest parking standard for uses in that class will be utilised.

4. Motorcycle Parking Standards

Motorcycle/scooter spaces will need to ensure they are secure, well lit, and situated in prominent, accessible locations and over looked. For security, the use of anchor points (such as steel rails or hoops) is recommended as a minimum. Table 4 below outlines the parking standards for motorcycles and scooters.

Table 4 - Motorcycle Parking Standards

Land use - new developments	Required number of motorcycle space(s)
Non residential	Minimum of 1 space for all new developments Plus 1 space per 30 car parking spaces
Residential	1 unallocated space (in communal areas) per 30 car parking spaces

5. Blue Badge Parking

When considering blue badge parking, the current district council standards were considered alongside national policies and guidance; guidance from non- governmental organisations; and best practice examples from other authorities as identified in the national policies and guidance. Table 5 below outlines the recommended numbers of reserved spaces for Blue Badge parking.

Table 5 – Blue Badge Parking Standards

Land use - new developments	Required number of Blue Badge space(s)
Employment premises for employees and visitors < 200 spaces	5% of capacity, minimum 2 spaces
Employment premises for employees and visitors > 200 spaces	2% of capacity plus 6 spaces
Shopping areas, leisure and recreational facilities < 200 spaces	6% of capacity, minimum 3 spaces
Shopping areas, leisure and recreational facilities > 200 spaces	4% of capacity plus 4 spaces

Blue badge parking should be located within 50 metres of the entrance of the service it is provided for, on firm, level ground, in well-lit areas. If the distance between the parking facility and the entrance is (unavoidably) greater than 50 metres, no more than 50 metres should be uncovered. Where ramps are used to provide level access it is important to consider that these can be difficult to negotiate for some ambulant disabled people.

The route between the parking facility and the service should be direct and suitable for wheelchairs and those with limited mobility, with no steps, bollards, or heavy doors.

In multi-storey car parks blue badge parking should be on the same level as pedestrian access, or positioned close to a lift with wheelchair access. In all cases, blue badge parking should be positioned to protect users from moving traffic.

Where machines with audio capabilities (such as ticket machines and entrance and exit gates) are present, a loop system should be in place to help users with limited hearing to use these.

6. Residential car parking size and design

Dimensions for car parking

Evidence shows that the size of vehicles has increased over time. As a result, the size of parking spaces has been reviewed, and the size increased for both residential and non-residential parking, to better reflect the current size of vehicles. Table 6 below identifies the minimum bay size for cars.

Table 6 – Minimum car parking dimensions

Dimension	Minimum Size
Length	5.0m
Width	2.8m

The minimum bay size must be used unless developer evidence suggests otherwise. If spaces are smaller than the minimum bay size, the bay will no longer be considered a usable parking space. Where spaces are constrained by a wall on one side, which may consequently prevent a door from opening, the space may need to be larger.

For Blue Badge parking bays the design of each space will need to make provisions for disabled drivers and cars carrying disabled passengers. The standards for a standards bay, in line bay and bank of bays can be found in Table 7 and 8 below.

Table 7 – Minimum off-street car parking dimensions for Blue Badge parking

Type	Minimum Size
When bays are adjacent	5.1 X 3.8m (1.2m of this may be shared between two adjacent spaces)
Parallel bays	6.6 X 3.8m
Height (if applicable)	2.6 m

Table 8 – Minimum on-street car parking dimensions for Blue Badge parking

Type	Minimum Size
At an angle to the access aisle	5.1 X 3.3m
Parallel to the access aisle	6.6 X 3m If cannot access footway from vehicle, width should be 3.3m

Street width design needs to be considered to accommodate on-street parking. Where unallocated parking spaces are distributed throughout a development, an increased

carriageway width should be used for in line parking provision to allow cars to park on either side of the street, leaving at least an appropriate width carriageway. Increasing the length of an on-street parking bay may also need to be considered for parallel parking. Table 9 below identifies the minimum in line parking dimensions.

Table 9 – Minimum in line parking dimensions

Dimension	Minimum Size
Length	6.0m
Width	3.0m

Parking spaces in front of a garage or vertical feature would require a 5.5m space for access to the car boot.

There should be a distance of 6.5m between rows for access where the parking spaces are at right angles to the traffic lane. The distance between rows can be reduced where the parking spaces are at angles to the traffic lane.

Garage provision and size

It is clear that some garages within Aylesbury Vale are not used for parking of vehicles, but instead are used for storage or other purposes. Historically, garages have been too small to accommodate most family cars, a bicycle and other domestic goods - contributing to this problem. Garages are, therefore, required to provide enough space for all functions they are planned to accommodate. Where a garage is to be used for cycle or motorcycle parking, a suitable area must be provided on top on the dimensions set out here. This area must meet the minimum dimensions set out for cycle and motorcycle parking in Sections 3 and 4 respectively. Table 10 below sets out the minimum dimensions for a garage.

Table 10 – Minimum garage dimensions

Dimension	Minimum Size
Length	6.0m
Width	3.0m

7. Parking Courts

Rear parking courts will only be considered in circumstances where no other alternative can be used. Where a rear parking court is considered it must be part of a coherent overall layout, be small and over looked by dwellings and secured.

Front court parking should be located to the front of plots with no more than 6 spaces in a row. Sufficient space will be incorporated in between sections of parking for appropriate planting to reduce the visual dominance of the cars in the street. 2m wide paths to the rear of the bays ensure cars do not overhang and affect pedestrian movement.

Appendix C referred to in MM279

C.1 The appendix identifies the standards of provision for publicly accessible natural green space and how the standards are to be applied to proposals for new development as required by Policy I1 of the VALP.

C.2 The starting point for calculating the green infrastructure requirement of a development proposal are the standards set out in the standards below. The precise type of on-site provision that is required will depend on the nature and location of the proposal, existing open space provision in the surrounding area and the quantity/type of accessible natural green space needed in the area. This should be the subject of discussion/negotiation at the pre-application stage.

C.3 If either of the following apply:

- a) the proposed residential development site would be of insufficient size in itself to make the appropriate provision in accordance with the standards below; or
- b) taking into account the accessibility/capacity of existing open space facilities and the circumstances of the surrounding area, the open space needs of the proposed residential development can be met more appropriately by providing either new or enhanced provision off-site,

then proposals will be acceptable if the developer has first entered into a planning obligation to make a financial or in-kind contribution towards meeting the identified open space needs of the proposed residential development off-site. The precise contribution/obligation will be negotiated on a case by case basis.

C.4 Where appropriate, the Council will seek to enter into a Section 106 agreement with the developer for the future management and maintenance of the open space provision, before any grant of planning permission.

C.5 In addition to the standards in the standards below, the quantitative and access standards for Locally Equipped Areas of Play (LEAP) (and Local Areas of Play – LAP), Neighbourhood Equipped Areas of Play (NEAP), Multi Use Games Areas (MUGAs) and skateboard parks as set out in Tables 1,2 and 4 of the Fields in Trust publication “Guidance for Outdoor Sport and Play: Beyond The Six Acre Standard” (and any subsequent iteration) will apply as will

the qualitative and design standards set out for MUGAs in the Sport England publication “Artificial Surfaces for Outdoor Sport” and any subsequent updates.

- C.6 Catchment distances are set out in the Quantity and Accessibility Standards in the standards below. These distances are to be measured as the distance by car from any home in an applicable development. To meet the standard, an accessible natural green space of the required size or larger must be provided within the catchment distance. A category of accessible natural green space of a larger size, including a space with no catchment marked, will be deemed to meet the need of categories of smaller sizes of accessible natural green space as well, providing it is within the required catchment distances of the homes for these smaller sizes of accessible natural green space.
- C.7 To apply the standards the population figure is the existing population plus the number of people living on the proposed development.

Quantitative/Accessibility Standard

1. No person should live more than 300m from their area of natural green space of at least 2ha in size and that there should be at least 2ha of accessible natural green space per 1000 population
2. At least one accessible 20ha of accessible natural green space within 2km of peoples' homes
3. One accessible 100ha of accessible natural green space within 5km of peoples' homes
4. One accessible 500ha of accessible natural green space within 10km of peoples' homes
5. 1.4ha per 1000 population as incidental open space (a type of accessible natural green space that incorporates amenity/landscape planted areas, green corridors)
6. 1.2ha per 1000 population as major open space (a type of accessible natural green space that incorporates parks, formal gardens and public open space)

Quality Standard

1. Contribute to the management, conservation and improvement of the landscape
2. Contribute to the protection , conservation and management of historic landscapes, archaeological and built heritage assets
3. Maintain and enhance biodiversity and ensure that development and its implementation results in a net gain of biodiversity as identified in Biodiversity Action Plan habitats and species plans
4. Deliver the enhancement of existing woodlands and create new woodlands and tree features
5. Create new recreational facilities, particularly those that present opportunities to link urban and countryside areas
6. Take account of an integrate with natural processes and systems
7. Be managed to provide cost-effective and multi-functional delivery and funded in urban areas to accommodate nature, wildlife, historic and cultural assets, economic benefits and provide for sport and recreation activities
8. Designed to high standards of sustainability to deliver social, economic and environmental benefits
9. Provide a focus for social inclusion, community cohesion and development and lifelong learning

Appendix D referred to in MM280

- D.1 This appendix identifies the standards of provision for sports and recreation facilities and how they are to be applied to proposals for new development as required by Policy I2 of the VALP.
- D.2 The starting point for calculating the requirement are the standards set out in the table below. The precise type of on-site provision that is required will depend on the nature and location of the proposal, the existing facilities in the surrounding area and the quantity/type of sports and recreation facilities needed in the area. This should be the subject of discussion/negotiation at the pre-application stage.
- D.3 If either of the following apply
- (a) the proposed residential development site would be of insufficient size in itself to make the appropriate provision in accordance with the standards below; or
 - (b) taking into account the accessibility/capacity of existing sport and recreation facilities and the circumstances of the surrounding area, the sports and recreation needs of the proposed residential development can be met more appropriately by providing either new or enhanced provision off-site,
- then proposals will be acceptable if the developer has first entered into a planning obligation to make a financial or in-kind contribution towards meeting the identified sport and recreation needs of the proposed residential development off-site. The precise contribution/obligation will be negotiated on a case by case basis, a formula for calculation will be set out in the Open Space, Sports, Leisure and Cultural Facilities SPD.
- D.4 Where appropriate, the council will seek to enter into a Section 106 agreement with the developer for the future management and maintenance of the sports and recreation facility provision, before granting planning permission.
- D.5 To apply the standards the population figure is the existing population of the closest settlement plus the number of people living on the proposed development.
- D.6 If development proposals are considered to be unviable when complying with the above requirements, open book financial analysis of proposed development will be expected. In accepted circumstances, a reduced provision can be made.

Typology	Accessibility Standard	Quantitative Standard	Qualitative Standard
Sports Halls	No part of Aylesbury Vale should be outside of a 20 minute travel time.	0.28 badminton courts per 1,000 population; facilities should be delivered in four court units with ancillary hall of no less than 1,500sqm and relevant support facilities.	The minimum acceptable quality standard for indoor sports halls and their associated facilities will be to meet the most current (at time of provision) Sport England Design Guidance - Sports Halls Design and Layouts recommendations for a public use facility.
Swimming	No part of	0.2 pool lanes per 1,000	The minimum acceptable

Typology	Accessibility Standard	Quantitative Standard	Qualitative Standard
Pools	Aylesbury Vale should be outside of a 20 minute travel time.	population. Provision should be accompanied by the necessary support facilities (changing, plant, reception etc.)	quality standard for indoor swimming pools and their associated facilities will be to meet the most <i>current (at time of provision) Sport England Design Guidance Swimming Pool Design recommendations for a public use facility.</i>
Community Centres and Village Halls	See cell in 'Quantitative Standard' column for combined accessibility and quantitative standards	<p>No provision required at Hamlet or Rural Parish 1 level;</p> <p>At Rural Parish 2 level a small community centre with main hall up to 100m² with foyer, small meeting room, adequate storage, kitchen, toilet facilities and parking;</p> <p>At Rural Parish 3 level a medium sized community centre up to 250m², as above with addition of meeting room(s), and stage;</p> <p>At cluster and Larger Sustainable Settlement level a minimum 18m x 10m main hall and ancillary facilities suitable for sporting activities to standards set in Sport England Design Guidance Note <i>Village and Community Halls</i> plus small fitness room to relevant Sport England guidance; and a minimum 18m x 10m main hall with fixed or demountable stage and ancillary facilities suitable for arts and performance activities to standards set in Sport England Design Guidance Note <i>Village and Community Halls</i>. These two halls may in practice be the same if either meets the other's specification.</p> <p>For the Aylesbury and Buckingham Strategic Settlements, and in proximity to Milton Keynes (North East Aylesbury Vale) , no part of the settlement should be further than one mile from a community centre. The quantitative standard is one centre per 5,300</p>	The minimum acceptable quality standard for community centres will be to meet the most <i>current (at time of provision) Sport England Design Guidance recommendations for these facilities</i> , accepting that the facility mix may not be directly the same as the Guidance, together with such environmental standards relating to sustainability, energy consumption and recycling, and building construction as required by the Council at the time of provision.

Typology	Accessibility Standard	Quantitative Standard	Qualitative Standard
		<p>population, to include:</p> <p>Hall 18m x 10m</p> <p>Hall/Meeting Room 10m x 10m</p> <p>Meeting Room 5m x 3.5m approx</p> <p>Kitchen with server</p> <p>Toilets</p> <p>Storage for chairs, cleaning equipment, kitchen requirements, refuse</p> <p>Parking to meet the full requirements of the range of uses.</p>	
Artificial Grass Pitches	No part of the Aylesbury Vale should be outside of a 6 mile radius of an AGP.	0.03 AGP's per 1,000 population. Delivery should be as a minimum a full size floodlit AGP to the dimensions appropriate for the sport(s) it is being used for and as set out in the Sport England Design Guidance Notes <i>Selecting the Right Artificial Surface</i> and any specific sports National Governing Body requirements appertaining at the time of delivery. Provision should be accompanied by the necessary support facilities (changing, plant etc.) as set out in the qualitative standards.	The minimum acceptable quality standard for AGP's and their associated facilities will be to meet the most current (at time of provision) Sport England Design Guidance Notes) Sport England Design Guidance on Artificial Surfaces for Outdoor Sport and its associated documents, or such replacement or updated guidance, and any specific sports National Governing Body requirements.
Grass Playing Pitches	A variety of accessibility standards for grass pitches have been used, depending on the specific sport but overall a minimum accessibility standard	Aylesbury Strategic Settlement – 0.49 adult size grass pitch per 1,000 population, 0.03 cricket wickets per 1,000 population; Aylesbury Vale (other than Aylesbury) - 0.73 adult size grass pitch equivalent per 1,000 population, 0.28 cricket wickets per 1,000 population In terms of provision, delivery should be as a minimum equate to a full adult size football pitch to the maximum recommended	The minimum acceptable quality standard for grass pitches and their associated facilities will be to meet the most <i>current (at time of provision)</i> Sport England Design Guidance Notes on <i>Natural Turf Pitches</i> and any specific sports National Governing Body requirements. Pavilion standards shall be as set out in the Sports England

Typology	Accessibility Standard	Quantitative Standard	Qualitative Standard
	would be for pitch provision within a 15 minute drivetime of each settlement area.	dimensions (including run offs) of the Football Association. Provision should be accompanied by the necessary support facilities (changing, showers plant etc.) as set out in the qualitative standards.	Design Guidance Note <i>Pavilions and Clubhouses</i> and any specific sports National Governing Body requirements.
Outdoor Tennis	The accessibility standard used is access to floodlit courts within a 10 minute drivetime.	Aylesbury Strategic Settlement – 0.4 floodlit outdoor tennis courts per 1,000 population; Aylesbury Vale (everywhere other than Aylesbury) - 0.7 floodlit outdoor tennis courts per 1,000 population. In terms of provision, delivery should be to Lawn Tennis Association recommended dimensions for the number of courts concerned, and provision should be located in four court blocks and floodlit. Realistically it should be possible to encompass other sports within the facility (e.g. as a MUGA), to maximise the options for usage throughout the year, and this should be considered if there is to be no formal tennis club based on the site and its predominant focus is casual use.	The minimum acceptable quality standard for outdoor tennis courts and their associated facilities will be to meet the most <i>current (at time of provision) Lawn Tennis Association Technical Guidance</i> . Facilities in four court blocks should be suitable for other sporting uses if required.

Appendix E referred to in MM281

1. SPD1 – Aylesbury Garden Town Framework and Infrastructure SPD

To provide additional guidance on the principles set out in VALP and clear guidance on how it is to be delivered.

2. SPD 2 - Aylesbury South (D-AGT 1) Masterplan SPD

Masterplan for the site to ensure comprehensive development of the strategic allocation.

3. SPD 3 – RAF Halton (D-HAL003) SPD

To ensure a comprehensive development of the site that is likely to extend beyond the plan period.

4. SPD 4 - Affordable Housing SPD

To provide detailed guidance and operation of Policy H1.

5. SPD 5 – Aylesbury Vale Design SPD

To provide detailed design guidance and operation of all relevant Plan policies.

6. SPD 6 – Buckinghamshire Biodiversity Accounting SPD

To provide detailed guidance and operation of Policy NE1. This SPD is being produced to apply Buckinghamshire-wide and will be hooked to policies in the relevant adopted local plans for each former district area.

7. SPD 7 – Open Space, Sports, Leisure and Cultural Facilities SPD

To provide detailed guidance and operation of Policies I1, I2 and I3.

8. SPD 8 – Shenley Park, North East Aylesbury Vale (D-WHA001) SPD

9. Masterplan for the site to ensure comprehensive development of the strategic allocation

Appendix F referred to in MM282

AVDLP Saved Policies	VALP Replacement Policies	Commentary
GP2 Affordable housing	H1 Affordable Housing	
GP3 Low cost market housing	None	Policy redundant no longer relevant
GP4 Affordable housing on small sites for local needs	H2 Rural Exception sites	
GP6 Conversion or subdivision of existing dwellings	BE3 Protection of the amenity of residents	
GP8 Protection of amenity of residents	BE3 Protection of the amenity of residents	
GP9 Extensions to dwellings	BE3 Protection of the amenity of residents	
GP11 Annexes to dwellings in the countryside	BE2 Design of new development	
GP17 Retention in use of existing employment sites	E1 Protection of key employment sites and enterprise zones and E2 Other employment sites	
GP24 Car parking guidelines	T6Vehicle Parking	
GP25 Re-opening of rail routes	T2 Supporting and protecting transport schemes	
GP26 Safeguarded station sites	T2 Supporting and protecting transport schemes	
GP30 Safeguarded road schemes	T3 Supporting local transport schemes	
GP32 Retention of shops, public houses and post offices	D7 Town, village and local centres to support new and existing communities	
GP35 Design of new development proposals	BE2 Design of new development	
GP38 Landscaping of new development proposals	I1Green Infrastructure and NE4 Landscape character and locally important landscapes	
GP39 Existing trees and hedgerows Saved	NE8 Trees, hedgerows and woodlands	
GP40 Retention of existing trees and hedgerows	NE8 Trees, hedgerows and woodlands	
GP45 "Secured by Design" considerations	BE2 Design of new development	
GP53 New development in and adjacent to Conservation Areas	BE1 Heritage assets	
GP57 Advertisements in Conservation Areas	BE1 Heritage assets	
GP59 Preservation of archaeological remains	BE1 Heritage assets	
GP60 Development and Parks or Gardens of Special Historic Interest	BE1 Heritage assets	

AVDLP Saved Policies	VALP Replacement Policies	Commentary
GP66 Access corridors and buffers adjacent to watercourses	NE2 Rivers and stream corridors	
GP69 Hotel and motel development	E7 Tourism Development and E8 Tourism accommodation	
GP70 Changes of use of rural buildings and historic buildings to hotel use	E7 Tourism Development and BE1 Heritage assets	
GP71 Bed and breakfast and guesthouse development	E8 Tourism accommodation	
GP72 Proposals for self-catering holiday accommodation and holiday homes	E8 Tourism accommodation	
GP73 Proposals for camping and touring caravan sites	E8 Tourism accommodation	
GP77 Horse-related development	C2 Equestrian development	
GP78 Stables, loose boxes and other buildings for horses	C2 Equestrian development	
GP79 Proposals for noisy sports	NE5 Pollution, air quality and contaminated land	
GP80 The Wendover Arm of the Grand Union Canal Saved	C4 Protection of public rights of way	
GP81 Development of canal-related facilities	NE4 Landscape character and locally important landscape	
GP84 Public rights of way	C4 Protection of public rights of way and T7 Footpaths and cycle routes	
GP86 Provision of outdoor playing space	I1 Green infrastructure	
GP87 Application of open space policies Saved	I2 Sports and recreation	
GP88 Payment in lieu of providing sports and play areas	I2 Sports and recreation	
GP90 Provision of indoor sports facilities	I2 Sports and recreation	
GP91 Provision of amenity areas Saved	I1 Green infrastructure	
GP92 Safeguarding of allotment land	I1 Green infrastructure	
GP93 Safeguarding of community buildings and facilities	I3 Community facilities and assets of community value	
GP94 Provision of community facilities and services	I3 Community facilities and assets of community value	
GP95 Unneighbourly uses	BE3 Protection of the Amenity of Residents and NE5 Pollution,	

AVDLP Saved Policies	VALP Replacement Policies	Commentary
	air quality and contaminated land	
GP99 Development beneath overhead electricity lines Saved	BE3 Protection of the amenity of residents	
GP100 Proposals for telecommunication development	I6 Telecommunications	
AY1 Considerations for traffic-generating proposals	None	Policy redundant; ALUTS abandoned non CIL compliant
AY2 Additional financial contributions to the ALUT strategy	None	Policy redundant; ALUTS abandoned non CIL compliant
AY3 Phasing of transport infrastructure	T3 Supporting local transport schemes	
AY4 Tring Road (former BPCC factory) site	None	Policy redundant; development started
AY5 Stoke Mandeville Hospital site	None	Policy redundant; development complete
AY6 Bearbrook House site, Oxford Road	None	Policy redundant; development complete
AY7 TA Centre site, Oxford Road	None	Policy redundant; development complete
AY8 Ardenham Lane site	D-AYL032.	Reduced site reflecting changes of circumstances.
AY11 Reallocated sites - Circus Fields	None	Policy redundant; development complete
AY12 Requirement for planning briefs and public consultation regarding MDAs	None	No longer relevant – specifics included in separate policies D-AGT 1 – D-AGT 6
AY13 Berryfields MDA	D-AGT5: Berryfields	
AY14 Weedon Hill MDA	None	Policy redundant; development complete
AY15 Aston Clinton Road MDA	None	Policy redundant; planning permission granted & development committed
AY16 Other employment sites	None	Policy redundant; development complete or with Planning permission
AY17 Public transport to serve new developments	T5 Delivery transport in new development	
AY18 Safeguarded land for new rail stops	None	Policy redundant; development complete or no longer safeguarded
AY20 Development of the cycle network	T7 Footpaths and cycle routes	
AY21 Parking policy guidelines	T6 Vehicle parking	
AY22 Western Link Road	None	Policy redundant; road

AVDLP Saved Policies	VALP Replacement Policies	Commentary
		complete
AY24 Mixed-use redevelopment, Exchange Street	D8 Town centre development	
AY27 Provision of new foodstore retailing	D8 Town centre redevelopment and D9Aylesbury town centre	Policy partially redundant; development complete or permission granted
AY28 Development within the Primary Shopping Frontages	E6 Shop and business frontages	
AY29 Development within the Central Shopping Area outside the Primary Shopping Frontages	D8 Town centre development	
AY30 Café and restaurant development	D9 Aylesbury town centre	
AY31 Housing in the town centre	D8 Town centre development and D10 Housing in Aylesbury town centre	
AY34 Redevelopment of Exchange Street/Canal Basin	None	Policy redundant development complete
BU1 Housing development at Moreton Road	None but see D-BUC043	Policy redundant; development complete
BU3 Employment development	None	Policy redundant; development complete
BU6 Primary Shopping Frontages	E6 Shop and business frontages	
BU7 Development elsewhere in the CSA	D7 Town, village and local centres to support new and existing communities	
BU8 Sites at West Street/Moreton Road and Bridge Street	None (Buckingham Neighbourhood Plan EE2)	Policy redundant; development complete or committed
BU10 Pedestrian priority area proposals	D7 Town, village and local centres to support new and existing communities	
BU11 Buckingham Riverside Walk	Buckingham Neighbourhood Plan CLH8	
HA1 Employment development at Thame Road	None	Policy Redundant development complete or committed
HA2 Primary Shopping Frontage at Banks Parade	Haddenham Neighbourhood Plan RJB1	
RA2 Loss of open gaps and consolidation of settlements	S3 Settlement hierarchy and cohesive development	
RA3 Extension of residential curtilages into open countryside	BE2 Design of new development and NE4 Landscape character and locally important landscapes	
RA4 Considerations for countryside recreation	I1 Green infrastructure and I2 Sports and recreation	

AVDLP Saved Policies	VALP Replacement Policies	Commentary
RA5 New golf courses	I2 Sports and recreation	
RA6 Development in the Metropolitan Green Belt Saved	S4 Green Belt	
RA8 Development in the Areas of Attractive Landscape and Local Landscape Areas	NE4 Landscape character and locally important landscape	
RA11 Conversion of buildings in the countryside	C1 Conversion of rural buildings	
RA13 Development within settlements listed in Appendix 4	D3 Proposals for non-allocated sites at strategic settlements, larger villages and medium villages and D4 Housing development at smaller villages	
RA14 Development at the edge of Appendix 4 settlements	D3 Proposals for non-allocated sites at strategic settlements, larger villages and medium villages and D4 Housing development at smaller villages	
RA17 Replacement dwellings in the Metropolitan Green Belt and special landscape areas	S4 Green Belt	
RA18 Extensions to dwellings in the Metropolitan Green Belt and special landscape areas	S4 Green Belt	
RA24 Occupancy conditions for horse-related dwellings	H3 Rural workers dwellings	
RA25 Calvert	None	Policy redundant; development complete
RA26 Pitstone	None	Policy redundant; development complete or committed
RA29 Proposals for new employment uses in the countryside	NE4 Landscape character and locally important landscape and BE2 Design of new development	
RA30 Employment at Silverstone Motor Racing Circuit	E10 Silverstone circuit and Silverstone Park EZ	
RA31 Silverstone Employment Area Saved	E10 Silverstone circuit and Silverstone Park EZ	
RA32 Employment at the Royal Ordnance site, Westcott	E1 Protection of key employment sites and enterprise zones	
RA33 Westcott Sports and Social Club	I3 Community facilities and assets of community value	
RA34 Development of Newton Longville Brickworks	None	Not promoted in HELAA no planning applications other than temporary uses – little/no interest - not critical for VALP employment policies - Delete Allocation

AVDLP Saved Policies	VALP Replacement Policies	Commentary
RA35 Safeguarded road corridor at Newton Longville Brickworks	None	Little/no possibility of implementation in VALP no route identified or agreed/safeguarded - uncertainty over Expressway route Policy Redundant
RA36 Development causing traffic adversely affecting rural roads	T5 Delivering transport in new development	
RA37 New accesses to inter-urban A-class or Trunk Roads	T5 Delivering transport in new development	
WE2 The Central Shopping Area (CSA)	D7 Town, village and local centres to support new and existing communities	
WI1 Housing development at Verney Road	None	Policy redundant; development complete
WI2 Employment development at Buckingham Road Saved	Winslow Neighbourhood Plan Policy 6	AVDLP Policy redundant; development complete or committed
WI3 The Central Shopping Area (CSA)	Winslow Neighbourhood Plan Policy 17	