

South West Milton Keynes

Updated Planning Statement

Carter Jonas LLP

June 2020

CONTENTS

1.0 Introduction	1
The Applicant	1
Application Site	1
Application Revisions	1
Revised Description of Development	3
Planning Application Background	3
Development Plan Position	4
Revised Supporting Documents	5
Report Structure	6
<hr/>	
2.0 Background	7
Introduction	7
Salden Chase Planning Application (AVDC Ref. 10/00891/AOP	7
AVDC Application Ref. 15/00314/AOP Update	7
MKC Application Ref. 15/00619/FUL	9
VALP Allocation – D-NLV001: South West Milton Keynes	9
Milton Keynes Strategy for 2050: Draft for Engagement (January 2020)	10
<hr/>	
3.0 Proposed Development	11
The Site	11
The Surrounding Area	11
Proposed Development	11
Land Uses	12
Employment	13
Retail	13
Grid Road Reserve	13
Density	14
Building Heights	14
Open Space & Recreation	15
Sustainability	15
Drainage	15
Waste Management	15
Utilities & Infrastructure	16
<hr/>	
4.0 Planning Policy Context & Analysis	17
Introduction	17
Approach	18
Site Specific Policies	19
Sustainable Development	20
Housing	20
Affordable Housing	21
Employment	21
Retail/Town Centre	22
Community & Recreation Facilities	22
Grid Road	23
Design	23
Landscape	25
Ecology	26
Heritage	27
Renewable Energy	27
Flooding & Drainage	28
Transport	28
Noise	30

Air Quality	31
Planning Obligations & Conditions	31
Newton Longville Village Plan (2012)	32
Planning Policy Conclusion	32
5.0 Key Benefits	34
Social Benefits	34
Environmental Benefits	34
Economic Benefits	35
6.0 Housing Supply and Delivery	36
Housing Supply	36
Housing Delivery	36
7.0 S106 Heads of Terms	38
8.0 Planning Balance	40
9.0 Summary & Conclusion	42
Appendices	
Appendix 1: Application Site (Drawing No. CSA/4857/111)	44
Appendix 2: Planning Application Documents List	45
Appendix 3: SUBMISSION VALE OF AYLESBURY LOCAL PLAN 2017 (AS MODIFIED NOVEMBER 2019) – POLICY D- NVL001	46
Appendix 4: SUBMISSION VALE OF AYLESBURY LOCAL PLAN 2017 (AS MODIFIED NOVEMBER 2019) – PROPOSALS MAP EXTRACT FOR POLICY D- NVL001	47
Appendix 5: AFFORDABLE HOUSING STATEMENT (TETLOW KING)	48

1.0 INTRODUCTION

1.01 This updated Planning Statement has been prepared by Carter Jonas LLP on behalf of the South West Milton Keynes Consortium (SWMK Consortium) in support of the submitted outline planning application AVDC Ref. 15/00314/AOP (the Planning Application). The Planning Application is for a mixed use development (The Proposed Development) at South West Milton Keynes (SWMK). The Planning Application was reported to AVDC's Strategic Development Management Committee (SDMC) in June 2017, where it was resolved to grant planning permission subject to conditions and the completion of a S.106 Agreement. An update report was presented to SDMC on the 24th April 2019. It was again resolved that planning permission should be granted subject to conditions and a S106 Agreement. At May 2020 the S106 Agreement has been agreed in principle but the document is yet to be engrossed. Draft conditions have also been agreed. As a result the Planning Application remains undetermined.

The Applicant

1.02 The Applicant for the Planning Application is the SWMK Consortium, comprising Hallam Land Management Ltd, William Davis Ltd, Taylor Wimpey UK Ltd, Connolly Homes and Bellcross Homes.

Application Site

1.03 The SWMK Consortium control land to the south west of Milton Keynes, south of the A421 and north of the disused former Oxford to Bletchley railway line (due to be reopened as part of the East West Rail project) – the Application Site. The Application Site is shown on Drawing No. CSA/4857/111 – see **Appendix 1**.

1.04 The Proposed Development area is located within the area of the former Aylesbury Vale District Council (AVDC) now Buckinghamshire Council (BC) but the principal access points to the A421 are within the administrative area of Milton Keynes Council (MKC). The Planning Application was submitted to both AVDC and MKC, so that each planning authority could determine the elements of the Proposed Development that fall within their respective administrative areas. As set out below, MKC has refused planning permission for those elements of the Proposed Development that fall within its administrative area i.e. the access points onto the A421 and Buckingham Road. The SWMK Consortium is in the process of pursuing an appeal against that decision.

Application Revisions

1.05 This updated Planning Statement has been prepared and submitted in respect of the AVDC Planning Application to address a number of minor amendments that have been made to the Proposed Development scheme and to address changes in regulation, policy and guidance since the original application was submitted.

1.06 The amendments to the Proposed Development have arisen for the following reasons:

- The alignment of the oil pipeline crossing the Application Site was not identified correctly in the original Planning Application drawings, and as a result needs to be amended to show the correct alignment. It should be noted that the oil pipeline was and continues to be, located within an area identified as a green infrastructure corridor in the Proposed Development;
- The standards required for climate change mitigation have been enhanced since the Planning Application was submitted. As a result, larger surface water attenuation ponds need to be included within the

Proposed Development, which has required minor changes in the size and disposition of the proposed development parcels;

- The housing needs of older people is identified as a specific issue in the emerging Vale of Aylesbury Local Plan, and this type of housing is supported by policy (Policy H6b as modified) on those sites identified by AVDC as suitable in the Housing and Economic Land Availability Assessment. The Application Site is identified as a suitable housing site and is a draft housing allocation. As a result, the Applicant has decided that an element of elderly persons' accommodation (within use class C3) should be included in the Proposed Development within the total quantum of housing.

- 1.07 These changes are not substantial. The oil pipeline remains in an area identified for a green infrastructure corridor within the Proposed Development. The surface water attenuation ponds have increased in size but are located within similar areas of the Proposed Development. The proposed extra care housing will be within use class C3 and is located within an area previously identified as a residential development parcel.
- 1.08 In light of these minor amendments, certain revisions need to be made to the submitted Planning Application, including the consequential amendment of the description of development and the submitted plans and drawings. These revisions will need to be subject to consultation with statutory consultees and local residents.
- 1.09 As mentioned above, there have also been a number of changes in regulation, policy and guidance that will need to be taken into account in determining the application. These updated requirements include the Town and Country Planning (Environmental Impact Assessment) Regulations which were revised in 2017. There have also been changes to relevant adopted and emerging development plan documents and policies since the Planning Application was submitted; Plan:MK was adopted in 2019 and the emerging Vale of Aylesbury Local Plan (VALP) was prepared and submitted for examination in 2017. The Government published a revised version of the National Planning Policy Framework in 2019, which updated national guidance from 2012 that was originally referred to in the Planning Application, including revised wording to the presumption in favour of sustainable development (paragraph 11). The interaction between AVDC planning policy, in particular policy GP35, and the revised wording in paragraph 11 of the NPPF has been considered in an appeal decision (APP/J0405/W/18/32033) and the High Court judgement (Newman Homes v SSHCLG [2019] EWHC 2367 (Admin) (October 2019).
- 1.10 This Planning Statement and the accompanying documentation, including an updated ES reflecting the requirements of the 2017 Regulations, address the up-to-date policy and regulatory framework. It should be noted at the outset that the likely significant impacts of the Proposed Development, as identified and assessed in the updated Environmental Statement, are not materially different from the previous findings in the 2015 Environmental Statement and its 2016 update.
- 1.11 A Memorandum of Agreement (MOU) was signed in early 2018 between AVDC and MKC in relation to their respective plan making activities. Paragraphs 4 and 5 relate to the Application Site and state:
- 'The Proposed Submission Vale of Aylesbury Local Plan allocates one site, at Salden Chase (Policy D-NLV001) for a total of 1,855 dwellings that will be closely related to West Bletchley in Milton Keynes.*
- In principle, both Councils concur as to the sites' suitability, subject to details regarding infrastructure and masterplanning matters. The site is included on the basis that detailed consideration is given to the impacts on infrastructure in Milton Keynes, as included in Proposed Submission VALP.'*
- 1.12 Following examination in 2018, Proposed Modifications to the VALP were published and subject to consultation late in 2019. The Application Site remains identified as an allocation in the Submission Vale of

Aylesbury Local Plan (SVALP2017) for a mixed use sustainable urban extension – Site Ref. NVL001: Land at South West Milton Keynes

- 1.13 As a result, supporting documents for the Planning Application have been updated to reflect these changes, including this Planning Statement, the Design & Access Statement and the Environmental Statement.

Revised Description of Development

- 1.14 The Proposed Development is described as follows:

Outline planning application with all matters reserved except for access for a mixed-use sustainable urban extension on land to the south west of Milton Keynes to provide up to 1,855 mixed tenure dwellings, including 60 extra care units (C3); an employment area (B1) including provision for a 6GP surgery (D1); a neighbourhood centre including retail (A1/A2/A3/A4/A5), community (D1/D2) and residential (C3) uses; a primary school; a secondary school; a grid road reserve; multi-functional green space; a sustainable drainage system; and associated access, drainage and public transport infrastructure.

- 1.15 The only change to the description of development is the reference to the 60 extra care units.

Planning Application Background

- 1.16 In January 2015 an outline planning application was made with all matters reserved except for access for a mixed-use sustainable urban extension on land to the south west of Milton Keynes. The application proposed the provision of up to 1,855 mixed tenure dwellings; an employment area (B1); a neighbourhood centre including retail (A1/A2/A3/A4/A5), community (D1/D2) and residential (C3) uses; a primary and a secondary school; a grid road reserve; multi-functional green space; a sustainable drainage system; and associated access, drainage and public transport infrastructure. The planning application was submitted to both AVDC and MKC so that each planning authority could determine the elements of that proposal that fall within their respective administrative areas.

- 1.17 The application was reported to AVDC's Strategic Development Management Committee on 7th June 2017. The Committee resolved to grant planning permission for that proposal. The resolution stated:

"That application 15/00314/AOP be Supported and Deferred and Delegated to officers subject to the completion of a legal agreement (with Bucks County Council, Aylesbury Vale District Council and if appropriate Milton Keynes Council) as outlined in the officer's report and subject to conditions as considered appropriate by officers. If this cannot be achieved then the application will be refused for reasons as considered appropriate by officers."

- 1.18 An update report was presented to SDMC on the 24th April 2019. It was again resolved that planning permission should be granted subject to conditions and the provision of an agreed S106 Agreement. Draft conditions have been discussed with AVDC and subject to minor amendments are agreed. In due course the conditions will need to be revised so as to relate to the updated Planning Application plans, drawings and documents.
- 1.19 The S106 Agreement for the Planning Application has been discussed and agreed in principle with AVDC, MKC and Buckinghamshire County Council.
- 1.20 It is anticipated that once the revised Application documents have been subject to consultation, the Planning Application will be reported back to BC's Strategic Development Management Committee for a decision.

- 1.21 On 19th November 2019 MKC issued a decision notice on the elements of the application (MKC Ref. 15/00619/FUL) that fall within its administrative area i.e. the access points onto the A421 and Buckingham Road. The application was refused for a single reason, which was as follows:

That in the opinion of the Local Planning Authority there is insufficient evidence to mitigate the harm of this development in terms of increased traffic flow and impact on the highway and Grid Road network, with specific reference to Standing Way and Buckingham Road, thus this will be in contravention of Policies CT1 and CT2 (A1) of Plan:MK.

- 1.22 The reason for refusal relates solely to highway matters and not to the principle of the Proposed Development. The SWMK Consortium has submitted an appeal against MKC's decision.

Development Plan Position

- 1.23 S38(6) of the Planning and Compulsory Purchase Act 2004, read together with s.70 of the Town and Country Planning Act 1990 require planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise. The AVDLP2004 constitutes the relevant development plan for those parts of the development within Buckinghamshire Council (formerly, AVDC).
- 1.24 Plan:MK constitutes the relevant development plan for those parts of the development within Milton Keynes. Plan:MK has been adopted since the Planning Application was submitted, and as such the Milton Keynes Local Plan 2001-2011 (December 2005) and the Milton Keynes Core Strategy (July 2013) no longer form part of the statutory development plan.
- 1.25 The adopted development plan within Buckinghamshire Council (formerly AVDC) – AVDLP2004 - is time expired. Its policies relating to the development strategy for the area and the housing requirement were intended to guide development up to 2011 and have not been saved. The unsaved policies no longer form part of the development plan. The interaction between the saved policies in the Aylesbury Vale District Local Plan and the NPPF was considered during 2019 in an appeal decision (Ref. PP/J0404/W/18/3203307) and subsequent High Court judgment (Newman v SSHCLG [2019] EWHC 2367 (Admin)). The High Court upheld the Inspector's decision that saved Policy GP35 of AVDLP2004 was relevant to applications for outline planning permission, consistent with the NPPF and up-to-date. Given the absence of other relevant saved policies in the AVDLP2004, Policy GP35 was the most important policy for determining the application and the tilted balance in paragraph 11 of the NPPF did not apply. As explained in Section 4 of this Planning Statement, the Proposed Development has been assessed against all relevant saved policies of AVDLP2004 and accords with all relevant saved policies, including Policy GP35. The Proposed Development accords with the relevant saved policies of AVDLP2004 and as such, pursuant to s.38(6) and paragraph 11(c) of the NPPF, the starting position is that planning permission should be granted unless material considerations indicate otherwise.
- 1.26 As set out in Section 4 of this Planning Statement, Plan:MK does not form part of the development plan for those parts of the development that fall within Buckinghamshire Council, but it does constitute a material consideration and as a recently adopted plan for the neighbouring authority, it should be given significant weight. The Proposed Development complies with the place-shaping principles for sustainable urban extensions on the edge of Milton Keynes.
- 1.27 A further significant change that has occurred since the original Planning Application was submitted is that the Application Site is now identified as a proposed allocation in the Submission Vale of Aylesbury Local Plan (SVALP2017) for a mixed use sustainable urban extension – Site Ref. NVL001: Land at South West Milton Keynes. In accordance with Paragraph 48 of the NPPF draft allocation Ref. NVL001 should be given substantial weight in the decision-making process because SVALP2017 has reached an advanced stage of the plan-making process; it is consistent with the NPPF and no modifications to delete the proposed allocation

have been made. The proposed modifications that have been suggested to Policy NLV001 and its supporting text are relatively minor and are proposed to ensure consistency with the Proposed Development (e.g. delivery timetable, green infrastructure, noise, and flood mitigation and drainage) and to ensure consistency with other strategic allocations in SVALP2017 (e.g. to delete the requirement for a masterplan supplementary planning document to be prepared).

Revised Supporting Documents

1.28 A full list of the Planning Application documents, plans and drawings that have been superseded is provided in **Appendix 2**. The following documents have been updated:

- Planning Statement - Carter Jonas
- Design & Access Statement - CSA
- Masterplan & Parameter Plans - CSA
- Landscape Strategy Plan - CSA
- Landscape & Visual Impact Assessment - CSA
- Flood Risk Assessment & Drainage Strategy - WSP
- Retail Assessment - Carter Jonas
- Employment Assessment - Carter Jonas
- Arboricultural Impact Assessment - CSA
- Transport Assessment & Framework Travel Plan - WSP
- Energy Statement - WSP
- Construction Environmental Management Plan -WSP
- Environmental Statement & Non-Technical Summary - Carter Jonas & Consultant Team

1.29 The following updated Application drawings are submitted for approval:

- Site Location Plan (Drawing No. CSA/4857/111);
- Illustrative Masterplan (Drawing No. CSA/4857/121 RevE);
- Development Framework Parameter Plan (Drawing No. CSA/4857/100 RevK);
- Proposed Access Designs (see Appendices M, O and P within the Transport Assessment – **ES Appendix 10.1**).

1.30 The following updated Application drawings are submitted for information:

- Open Space Parameters Plan (Drawing No. CSA/4857/113 RevC);
- Residential Density Plan (Drawing No. CSA/3857/119 RevC);
- Proposed Building Heights Plan (Drawing No. CSA/4857/114 RevC);
- Landscape Character Areas Plan (Drawing No. CSA/4587/121 RevD);
- Landscape Strategy Plan (Drawing No. CSA/4587/105 RevE);
- Key Structural Elements Plan (Drawing No. CSA/4587/120 RevE);
- Public Transport Plan (Drawing No. CSA/4857/117 RevC); and
- Phasing Plan (Drawing No. CSA/4857/129 RevA).

1.31 The revisions to the Planning Application are accompanied by an updated Environmental Statement (ES) which has been prepared in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 – referred to as the EIA Regulations.

1.32 The Proposed Development is EIA development. The scope of the ES is based on the previous version of the Planning Application (AVDC Ref. 15/00314/AOP) and updated to include an assessment of additional topics

required by the EIA Regulations 2017. The updated ES supersedes the 2015 ES and its 2016 Addendum. The updated ES comprises the following chapters:

1. Introduction - Carter Jonas
2. Application Site & Project Description – Carter Jonas
3. Policy Context & Alternatives – Carter Jonas
4. EIA Methodology – Carter Jonas
5. Archaeology & Heritage - Orion
6. Agriculture – Kernon Countryside Consultants
7. Ecology - CSA
8. Drainage - WSP
9. Landscape & Visual - CSA
10. Traffic & Transport - WSP
11. Air Quality - WSP
12. Noise & Vibration - WSP
13. Socio-Economics - Carter Jonas and EFM Ltd
14. Services & Utilities - WSP
15. Waste - WSP
16. Ground Conditions – WSP
17. Climate Change - WSP
18. Major Accidents and Disasters - WSP
19. Assessment of Significant Effects – Carter Jonas
20. Conclusions – Carter Jonas

Report Structure

- 1.33 Section 2 sets out the relevant planning background to the Application Site, including details of previous applications relating to the site and the proposed allocation in the emerging Vale of Aylesbury Local Plan. Section 3 describes the Proposed Development and identifies the key parameters. Section 4 contains an assessment of the Proposed Development against relevant local and national policy. Section 5 identifies the key benefits of the Proposed Development, in terms of social, environmental and economic matters. Section 6 identifies the delivery timetable for the Proposed Development, and explains the benefits that are offered by the Proposed Development in terms of deliverability. Section 7 identifies the S106 Heads of Terms. Section 8 contains an assessment of the planning balance for the determination of the Planning Application. Section 9 sets out the conclusions.

2.0 BACKGROUND

Introduction

2.01 The south western edge of Milton Keynes has been identified as a suitable and sustainable location for an urban extension since the early 1990s, through a series of technical studies and in former development plan documents. The Planning Application has been reported to Committees at AVDC and MKC and the outcome of decisions is provided below. The Application Site is now identified as an allocation in the Submission Vale of Aylesbury Local Plan (SVALP2017) for a mixed use sustainable urban extension. The background and the context for the Planning Application has changed since it was first submitted in 2015.

Salden Chase Planning Application (AVDC Ref. 10/00891/AOP)

2.02 In April 2010 an outline planning application was submitted for development to the south west of Milton Keynes, for a mixed-use sustainable urban extension for up to 5,311 dwellings, employment, community facilities, schools, transport infrastructure and green infrastructure. The application was accompanied by a full range of technical documents to determine the potential impact of that proposal and to identify mitigation measures where those impacts would be significant.

2.03 The planning application was withdrawn following the Council's decision to withdraw the former draft Aylesbury Vale Core Strategy 2010 from the examination process. At the time there was also uncertainty about proposed changes to national planning policy and the proposed revocation of regional strategies including the adopted South East Plan and Milton Keynes South Midlands Sub Regional Strategy.

AVDC Application Ref. 15/00314/AOP Update

2.04 In January 2015 an outline planning application was made with all matters reserved except for access for a mixed-use sustainable urban extension on land to the south west of Milton Keynes. The application proposed the provision of up to 1,855 mixed tenure dwellings; an employment area (B1); a neighbourhood centre including retail (A1/A2/A3/A4/A5), community (D1/D2) and residential (C3) uses; a primary and a secondary school; a grid road reserve; multi-functional green space; a sustainable drainage system; and associated access, drainage and public transport infrastructure. The planning application was submitted to both AVDC and MKC so that each planning authority could determine the elements of that proposal that falls within their respective administrative areas.

2.05 The Environmental Statement was subject to a formal revision in August 2016. The revisions were made to address matters raised during the consultation processes. In summary, the revisions related to landscape and visual, traffic and transport, air quality, and noise and vibration matters. The application drawings were also revised to reflect proposed revisions to the scheme.

2.06 The application was reported to AVDC's Strategic Development Management Committee on 7th June 2017 for a decision.

2.07 Section 8 of the Committee Report identified the consultation responses from statutory consultees, other organisations, and other Council teams. It is noted that at that time there were no reported objections to the planning application, subject to appropriate conditions and a S106 Agreement, from the following consultees: BCC Highways, Highways England, Environmental Health Officer, Contaminated Land Officer, BCC Education, Housing Officer, BCC Flood Management, BCC Archaeology, PROW Officer, Natural England, Tree Officer, Anglian Water, Drainage Engineer, and Environment Agency.

- 2.08 BCC Highways submitted a detailed consultation response to the planning application (provided at Appendix 3 of the Committee Report). In summary, BCC Highways, as local highway authority, concluded at the time that the planning application was acceptable subject to a number of transport conditions and a S106 Agreement to secure transport works and obligations. The suggested contributions related to the following: A421 corridor improvements, traffic calming in Newton Longville, road safety improvements in Whaddon, bus services, cycle parking, highway works to identified roundabouts and junctions, travel plan implementation and monitoring, upgrades and improvements to footpaths and bridleways, and improvements and connections to redways. As explained in Section 7 of this Planning Statement, the draft S106 Agreement includes a range of transport obligations to address the impact of the Proposed Development.
- 2.09 Section 10 of the Committee Report provided the Case Officer's evaluation of the planning application at that time against development plan policies, national guidance and statutory consultee comments. The Case Officer confirmed in the evaluation that the presumption in favour of sustainable development applied to increase the supply of housing, that the Proposed Development was consistent with relevant development plan policies and national guidance in force at that time, and acknowledged a number of benefits associated with the Proposed Development. For example, it was acknowledged that the Application Site was a sustainable location for growth, with good access to employment and leisure facilities in Milton Keynes. It was said that the Proposed Development would create employment opportunities and provide community and retail facilities to meet the needs of future residents. The Proposed Development would have significant landscape and visual impacts on the Application Site and the immediate surrounding area, but it was acknowledged that a substantial package of landscape measures was provided to mitigate those impacts. The design and was considered to be appropriate for the Application Site (in accordance with Policy GP35 of AVDLP2004), the MKC's Urban Design Officer concluding that the Proposed Development would be an appropriate urban extension to Milton Keynes containing features of other grid squares within the City.
- 2.10 The Committee resolved to grant planning permission for that proposal. The resolution stated:
- "That application 15/00314/AOP be Supported and Deferred and Delegated to officers subject to the completion of a legal agreement (with Bucks County Council, Aylesbury Vale District Council and if appropriate Milton Keynes Council) as outlined in the officer's report and subject to conditions as considered appropriate by officers. If this cannot be achieved then the application will be refused for reasons as considered appropriate by officers."*
- 2.11 As noted above an update report was presented to SDMC on the 24th April 2019. It was again resolved that planning permission should be granted subject to conditions and the settlement of a S106 Agreement. Draft conditions have been discussed with AVDC and subject to minor amendments are agreed. In summary, conditions will be agreed for the following matters: reserved matters relating to design and layout, construction management, landscaping, tree protection, ecology, drainage and flooding, archaeology, sustainability, commercial uses, waste, transport, noise and contamination. The Applicant will continue to work with BC (and MKC) as local planning authorities to identify the matters that will need to be the subject of conditions. The final conditions will need to relate to the updated Planning Application documents.
- 2.12 The S106 Agreement for the application has been discussed with AVDC, MKC and Buckinghamshire County Council. The Agreement is at an advanced stage of settlement but has not yet been completed and signed. In summary, the S106 Agreement is to include obligations for the following matters: affordable housing; open space; drainage; sports facilities; education; health facilities; community facilities; employment land and neighbourhood centre; and, highway works. The final version of the Agreement will need to relate to the updated Planning Application documents.

- 2.13 Therefore, it can be seen that the Planning Application is at an advanced stage of the process, and conditions and a S106 Agreement are close to being finalised. It is anticipated that once these updated Application documents have been subject to consultation, the Planning Application will be reported back to BC's Strategic Development Management Committee for a final decision.

MKC Application Ref. 15/00619/FUL

- 2.14 On 19th November 2019 MKC issued a decision notice on the elements of the application (MKC Ref. 15/00619/FUL) that fall within its administrative area, i.e. the access points onto the A421 Buckingham Road. The application was refused for a single reason, which was as follows:

That in the opinion of the Local Planning Authority there is insufficient evidence to mitigate the harm of this development in terms of increased traffic flow and impact on the highway and Grid Road network, with specific reference to Standing Way and Buckingham Road, thus this will be in contravention of Policies CT1 and CT2 (A1) of Plan:MK.

- 2.15 The reason for refusal relates solely to highway matters and not to the principle of the Proposed Development. The SWMK Consortium has submitted an appeal against this decision. The SWMK Consortium will work with MKC to identify areas of common ground for the appeal.

VALP Allocation – D-NLV001: South West Milton Keynes

- 2.16 The Application Site is located within a parcel of land allocated in the VALP as SVALP2017 for a housing-led mixed use development – Ref. D-NLV001. The policy and supporting text to Policy NVL001, as modified, is provided in Appendix 3. The Proposals Map showing the site allocation is provided in **Appendix 4**.
- 2.17 The decision to allocate land at South West Milton Keynes (Ref. NLV001) was based on the assessment of the site in the Housing and Economic Land Availability Assessment (HELAA) January 2017 and the Sustainability Assessment Report Technical Annex (SA) September 2017.
- 2.18 The HELAA concluded that the site is suitable. The assessment states (at pg.249 to 250) that:
- “Suitable – Site could provide for housing and employment and other economic development uses. The site is adjacent to Bletchley's housing areas and well connected by the strategic road network. Need to achieve a satisfactory landscape/visual impact and the Council retains a concern on the need to keep land south of the railway line (different HELAA sites) open to avoid coalescence with Newton Longville village.”*
- 2.19 The assessment in the SA identified positive sustainability outcomes associated with development at the site – at pg. 20 to 27. As noted above a Memorandum of Agreement (MOU) was signed in early 2018 between AVDC and MKC in relation to their respective plan making activities. Paragraphs 4 and 5 state:
- ‘The Proposed Submission Vale of Aylesbury Local Plan allocates one site, at Salden Chase (Policy D-NLV001) for a total of 1,855 dwellings that will be closely related to West Bletchley in Milton Keynes.*
- In principle, both Councils concur as to the sites' suitability, subject to details regarding infrastructure and masterplanning matters. The site is included on the basis that detailed consideration is given to the impacts on infrastructure in Milton Keynes, as included in Proposed Submission VALP.’*
- 2.20 Policy D-NLV001 was subject to a site specific hearing session at the VALP examination – Matter 15o. The Inspector published interim findings on 29th August 2018, to identify those issues that may require modifications to address soundness concerns. The site allocation at South West Milton Keynes (Ref. NLV001)

was not identified as a concern in the interim findings, which indicates the Inspector's view that the proposed allocation is sound and should be retained. AVDC prepared a list of suggested main modifications, which were subject to consultation during November and December 2019. Those suggested main modifications that relate to the site allocation at South West Milton Keynes (Policy D-NLV001) are minor and relate to the delivery timetable, green infrastructure, noise, and flood mitigation and drainage, but do not affect the principle of the allocation or development at the site.

- 2.21 As set out in Section 4, it is considered that Policy D-NLV001 should be given significant weight in any decision on the Planning Application because VALP has reached an advanced stage in the plan-making process, is consistent with the NPPF and the site allocation has been assessed as sound through the examination process.

Milton Keynes Strategy for 2050: Draft for Engagement (January 2020)

- 2.22 MKC published the Milton Keynes Strategy for 2050 (MK2050) for consultation in January 2020. AVDC jointly commissioned the evidence that informed MK2050. In due course MK2050 will be used to inform a review of Plan:MK. The evidence base for MK2050 will be used by Buckinghamshire Council (formerly AVDC) and South Northamptonshire Council (to be West Northamptonshire Council) to inform future reviews of their development plan documents.
- 2.23 MK2050 identifies potential strategies for housing, employment, transport and quality principles for new communities. MK2050 also references the opportunities associated with the Oxford to Cambridge Arc. MK2050 identifies potential strategic options for the growth of Milton Keynes and identifies direction of growth options into the neighbouring areas of BC and Central Bedfordshire. The decision to identify directions of growth into neighbouring areas was based on delivering sustainable patterns of growth unrestricted by administrative boundaries; although it is acknowledged in MK2050 that decisions about growth in neighbouring areas will be for those authorities.
- 2.24 MK2050 identifies and assesses a number of strategic directions of growth. The Application Site falls within Spatial Option 7: South West Milton Keynes. In summary, the assessment of this location identifies no environmental constraints to development and concludes that sensitive areas, e.g. woodland, ecological habitats, heritage assets and visually prominent areas could be protected. The assessment also acknowledges that the relationship between development and transport projects is a key opportunity for this area. It is adjacent to East West Rail and it could connect with and provide an extension to the existing walking and cycling network, as well as connecting with and accommodating a mass rapid transport system.
- 2.25 It is considered that the assessment in MK2050 of the growth option to the south west of Milton Keynes has reached the same conclusions as other studies and development plan documents since the early 1990s, namely, that the Application Site is a suitable and sustainable location for an urban extension.

3.0 PROPOSED DEVELOPMENT

The Site

- 3.01 The Application Site covers an area of 144.85 Ha and is located to the west of Far Bletchley, at the south western edge of Milton Keynes. The boundary of the Site is formed by the A421 (H8 Standing Way) and Buckingham Road (B4034) to the north, the disused former Oxford to Bletchley rail line to the south (due to be reopened as part of the East West Rail project), Whaddon Road to the west, and the existing residential area of Far Bletchley to the east. Weasel Lane – an existing bridleway and cycle route – cuts through the site from Whaddon Road to Buckingham Road. There are other public rights of way across the site, including the Milton Keynes Boundary Walk.
- 3.02 The Site currently comprises agricultural land. There are hedgerows and trees at some of the field boundaries. There are a few existing buildings on the site, which are farm buildings. There are adjoining buildings that are in residential use.
- 3.03 An oil pipeline crosses the middle of the site in a north south direction; a 30m wide exclusion zone for the pipeline is incorporated into the layout of the Proposed Development. There are high voltage overhead power lines crossing the north western part of the site; the power lines will be placed underground as part of the Proposed Development. An intermediate pressure gas main passes through the eastern part of the site in a north south direction; the gas main will fall within land set aside for the grid road reserve.

The Surrounding Area

- 3.04 The Application Site straddles the boundary between the rural hinterland of Aylesbury Vale and the urban area of Milton Keynes. To the north is the industrial area of Snelshall West and to the east is the established residential area of Far Bletchley. To the west and south of the site is farmland and open countryside. The village of Newton Longville is located to the south of the site.
- 3.05 The Application Site is located adjacent to Milton Keynes, which is a main centre in the region providing significant employment opportunities and containing a broad range of services and facilities. The Proposed Development includes walking, cycling and public transport infrastructure and facilities, which would connect to the existing networks in the surrounding area.
- 3.06 The surrounding area possesses an undulating land form characterised by a ridge running across the central length of the Application Site from east to west. The predominant topographic features are shallow ridges and valleys sloping away from this focal ridge line, which run broadly on a south west alignment.
- 3.07 The Application Site is well connected on a local, sub-regional and regional scale. The A421 immediately north of the site enables connections to Buckingham, Bicester and the M40 to the west, and the established Milton Keynes grid road network also linking to the A5 and M1 in the east, which provide connections to the wider city and region respectively.

Proposed Development

- 3.08 The rationale for the design and layout of the Proposed Development is described in more detail in the updated **Design & Access Statement**. In summary, the form and layout of the Proposed Development is strongly influenced by the principles that have governed the planned expansion of Milton Keynes. The Proposed Development includes a primary road structure, local routes with pedestrian/cycle route

connections, a neighbourhood centre at a prominent east west junction of the main connecting route, which would create lively, well used streets and walkable neighbourhoods which encourage linked trips and foster community cohesion. In addition, development in this location would reduce in-commuting and provide opportunities for future residents to access employment, services and facilities elsewhere in Milton Keynes by non-car modes of transport.

3.09 The design of the Proposed Development seeks to respond to the specific spatial context of both Milton Keynes and Aylesbury Vale and in particular the characteristics (density, built form, and open space) which define the built form of the residential areas located around or in close proximity to the Application Site. The three areas which have informed the design and layout are: the traditional grid square of Tattenhoe; the neighbourhoods in the southern part of Newton Longville; and the western neighbourhoods of Far Bletchley.

Land Uses

3.10 In summary, the Proposed Development will comprise the following uses: up to 1,795 dwellings; 60 extra care housing units, employment area; neighbourhood centre including retail and community uses; primary school; secondary school, grid road reserve; multi-functional green space; sustainable drainage system; and, associated access, drainage and public transport infrastructure. The proposed land uses are shown in Table 3.1 below.

Table 3.1 Land Uses

LAND USE	(Ha)
Allotments	1.18
Employment inc. GP Surgery (D1)	2.07
Green Infrastructure	53.97
Grid Road Reserve	7.28
Infrastructure	2.20
Neighbourhood Centre inc. Community Uses (D1/D2) and Retail Uses (A1/A2/A3/A4/A5)	0.67
Primary School	3.00
Secondary School	5.12
Secondary School Open Space	1.69
Water Attenuation	7.74
C3 Housing (1,795 dwellings)	53.00
C3 Extra Care Housing (60 dwellings)	0.90
SUB TOTAL	138.82
Highway Improvements	6.03
TOTAL	144.85

3.11 The Development Framework Parameter Plan (Drawing No. CSA/4857/100 RevK) shows the proposed distribution of uses across the site. The proposed distribution of uses is as follows:

- Residential on southern part of site and in north western quadrant
- Mixed-use in north eastern part of site, comprising employment, neighbourhood centre and residential uses including the extra care housing.
- Employment uses in north eastern part of site, opposite Snelshall West employment area, in a visible location and providing good access to the A421 and the wider strategic highway network.
- Land for a Primary School located towards the centre of the site, making it accessible to all future residents of the Proposed Development.

- Land for a Secondary School on the eastern boundary of the site, providing good access to and from existing and proposed residential areas and also good connections to the highway network and walking, cycling and public transport networks.
- The main areas of open space, sport and recreation are located in the centre of the site, making them accessible to all future residents of the Proposed Development, and with good connections to existing cycling and pedestrian routes. The formal sport and recreation areas comprise a local park and district park, football pitches, a cricket pitch, tennis courts, a Multi-Use Games Area (MUGA), and a skateboard park.
- A number of children's play areas have been provided throughout the site, within and close to the proposed residential areas.
- Allotment land is provided in the north eastern corner of the site.
- New highway access points at two locations on the A421 comprising an 'at grade' roundabout located on Buckingham Road that would cater for all traffic movements and a left turn 'access only' slip further west along Standing Way.
- A new 'Ghosted Right Turn' access that would cater for all traffic movements off Whaddon Road to the south east of Bottledump roundabout.
- Public Rights of Way that traverse the Application Site, comprising Weasel Lane; the Milton Keynes boundary walk; and a north/south route (Footpath 19) that continues south under the disused railway towards Newton Longville.
- Land within the Application Site for a Grid Road Reserve located towards the eastern part of the site, which would enable a continuation of V1 Snelshall Street to the north west of Tattenhoe roundabout.

Employment

- 3.12 The Proposed Development includes 2.07 hectares of land for employment uses, comprising small scale starter business units. There is a need and demand for these types of units in Milton Keynes, and they are not typically provided within the established employment areas or in Central Milton Keynes at rental levels that suit small businesses. It is appropriate to include small scale employment uses within the mix of uses provided at a sustainable urban extension. The employment provided within the Proposed Development would represent a marginal employment location which would not divert jobs or businesses from the main industrial and employment areas, as explained in the updated Employment Assessment submitted with this Planning Application.

Retail

- 3.13 The proposed neighbourhood centre would include a small convenience store, intended to meet the day to day needs of future residents. The convenience store would be part of a local centre alongside other retail, service and community uses; all neighbourhoods within Milton Keynes include a neighbourhood centre. The proposed convenience store would not be a supermarket attracting customers from elsewhere in Milton Keynes or the surrounding area. It is anticipated that most future residents of the Proposed Development would continue to shop at the existing supermarkets for their main weekly food shopping, as explained in the updated Retail Assessment.

Grid Road Reserve

- 3.14 The adopted development plan for AVDC and MKC include a requirement for a link road between the A4146 and A421; see Policy RA34 and RA35 of AVDLP2004 and Policy SD8 of Plan:MK. It is understood that both Councils have an aspiration for the link road to be delivered and it also has significant political support. The link road has been tested within the evidence base for SVALP2017 as a potential transport improvement. The link road would assist in reassigning 'through' traffic from the surrounding villages, which would be a benefit for

the existing residents of those villages. The Proposed Development reserves sufficient land to accommodate a dual carriageway grid road between Snelshall Street (V1) and the proposed East West Railway line, providing the opportunity for the future provision of a link road from the A421 and connecting to the A4146 Stoke Hammond By-pass. The land has been reserved within the Application Site, but the link road would in due course be designed and delivered by third parties and not the SWMK Consortium.

Density

3.15 The Proposed Development includes a variety of residential densities, as shown on the Residential Density Parameter Plan (Drawing No. CSA/4857/119 RevC). The average density is 36 dwellings per hectare (dph). Lower densities are proposed at the more sensitive boundaries, and higher densities close to the primary routes and at the neighbourhood centre. The variety of densities across the site is as follows:

- 25 to 30 dph – southern, western and eastern edges in more visually sensitive locations
- 30 to 35 dph – within less visible locations at the Site
- 35 to 40 dph – towards centre and north of Site adjacent to primary routes
- 40 to 45 dph - close to neighbourhood centre
- 66 dph – for extra care housing

Building Heights

3.16 The height of buildings within the Proposed Development is shown on the Building Heights Parameter Plan (Drawing No. CSA/4857/114 RevC). The plan shows the maximum building heights within the Proposed Development. The proposed building heights for the different uses are as follows:

- Residential Areas: 2 to 2.5 storeys (up to 10m) for most of Site, with 3 storeys (up to 11m) along primary routes and at key entrances or intersections in order to provide landmark or gateway buildings.
- Extra Care Housing: up to 13m.
- Employment Area: up to 12m, which is similar to other employment sites opposite and adjacent to A421.
- Neighbourhood Centre: up to 13m, with retail and community uses at ground floor and residential above.
- Primary School: up to 10m and two storeys for efficient use of site.
- Secondary School: up to 12m
- Changing Pavilion: up to 5.5m.

Access, Transport and Highway Improvements

3.17 The Proposed Development includes proposals to create new access points and improvements to the wider highway network, comprising the following: new highways access points to Whaddon Road, Buckingham Road, and a 'left in' only junction from A421; junction improvements to specific junctions on A421 and other key routes; financial contribution towards other highway improvements along A421 further west towards Buckingham and in the east through Milton Keynes; traffic calming on all the approach roads leading towards Newton Longville to discourage 'rat-running' and reduce vehicle speeds; speed management proposals for other local villages; and; funding to either extend an existing bus service or implement a new 'start up' service to connect the Proposed Development with Central Milton Keynes and social infrastructure. The **Transport Assessment** (in ES **Appendix 10.1**) includes drawings of proposed access arrangements with the public highway. Weasel Lane – an existing bridleway and Sustrans Route 51 – cuts through the Application Site from Whaddon Road to Buckingham Road. There are other public 'rights of way' across the site, including the Milton Keynes Boundary Walk. These 'rights of way' will be retained and incorporated into the Proposed Development. The Proposed Development includes walking, cycling and public transport infrastructure and facilities, which would connect to the existing networks in the surrounding area thus providing future residents

with the opportunity to travel by non-car modes of transport. A Public Transport Plan (Drawing No. CSA/4857/117 RevC) is submitted with the Planning Application to indicate a bus route and the location of bus stops within the Proposed Development.

Open Space & Recreation

3.18 The open space within the Proposed Development is shown on the Open Space Parameters Plan (Drawing No. CSA/4857/113 RevC). The Proposed Development includes open space and recreation facilities within the site, including a local park and play area, formal sports pitches, tennis courts and two Multi-Use Games Areas (MUGA), a skateboard park, children's play areas comprising two Neighbourhood Equipped Area of Play (NEAP) and nine Local Equipped Area of Play (LEAP), and allotments. These facilities are located where they are easily accessible to future residents within the Proposed Development and also existing residents from neighbouring areas.

Sustainability

3.19 The Proposed Development is sustainable in terms of the following: energy efficiency and carbon reduction; sustainable transport; water resource management; information and communications technology; business and employment; healthy community; social well-being; landscape and biodiversity; materials, waste and recycling; and housing. The Sustainability Statement explains how the Proposed Development is sustainable in these terms.

Drainage

3.20 The majority of the site lies within Flood Zone 1 and therefore is at low risk of flooding. The north western corner of the site is within Flood Zone 3 and as such is at high risk of flooding. However, the Environment Agency has no records of flooding at the site. All buildings will be located within Flood Zone 1. As explained in the updated **Flood Risk Assessment**, the Proposed Development will include sustainable drainage systems comprising rainwater harvesting and permeable paving. Attenuation basins will be included to attenuate surface water run-off to green field rates. The Proposed Development incorporates drainage infrastructure, foul water pumping stations and statutory undertakers equipment.

Waste Management

3.21 The Proposed Development would generate construction, household, commercial, and organic waste. The Consortium (or subsequent developers) will prepare a Site Waste Management Plan (SWMP). The SWMP will include measures to minimise the amount of waste generated and disposed of during the site clearance and construction phase of the Proposed Development.

3.22 As explained in Chapter 15: Waste of the updated ES, the Proposed Development will include both internal and external waste and recycling storage facilities. These facilities will be located within the curtilage of each house and in suitably designed enclosures on ground level for flats. These facilities will be designed to be convenient and easily accessible for future residents and waste collection crews. Sufficient exterior storage space will be provided to enable the installation by future residents of a home composting bin/food digester in the gardens of private houses and community composting facilities may also be an option.

3.23 Bring Sites will be required within the Proposed Development to provide additional recycling opportunities. Bring Sites are generally located within publicly accessible areas such as neighbourhood centre car parks and typically comprise a number of containers allowing separate collection of materials for recycling.

Utilities & Infrastructure

3.24 The Application Site contains a variety of utilities infrastructure. Exclusion zones are required for the oil pipeline and intermediate pressure gas main and these areas are kept free of development within green infrastructure and highway corridors. The high voltage overhead power lines which cross the site would be diverted underground as part of the Proposed Development. The relevant utility companies and statutory undertakers were contacted during the preparation of Chapter 14: Services & Utilities of the updated ES. The Application Site does not currently have utility supplies, but water, electricity, gas and telecommunications services exist in the neighbouring areas, so it would be possible for utilities connections to be made to the Proposed Development. The Proposed Development would incorporate drainage infrastructure, foul water pumping stations, statutory undertakers' equipment and surface water attenuation measures.

4.0 PLANNING POLICY CONTEXT & ANALYSIS

Introduction

- 4.01 This section of the Planning Statement sets out the planning policy background against which the Proposed Development is to be considered. It sets out the relevant statements of planning policy within the statutory and emerging development plan, the revised 2019 version of the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG).
- 4.02 S38(6) of the Planning and Compulsory Purchase Act 2004 states that “If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise”. Read together with s.70 of the Town and Country Planning Act 1990, this means that the development plan is the starting point for determination this Application.
- 4.03 Paragraph 26 (ld. 61) of the PPG explains the role of a Local Plan. It states in part that:
- “The development plan is at the heart of the planning system with a requirement set in law that planning decisions must be taken in line with the development plan unless material considerations indicate otherwise. Plans set out a vision and a framework for the future development of the area, addressing needs and opportunities in relation to housing, the economy, community facilities and infrastructure – as well as a basis for conserving and enhancing the natural and historic environment, mitigating and adapting to climate change, and achieving well designed places. It is essential that plans are in place and kept up to date....”*
- 4.04 It is clear that the successful operation of the planning system requires local planning authorities to maintain an up to date development plan. As set out below, the current adopted development plan for Aylesbury Vale – the Aylesbury Vale District Local Plan 2004 (AVDLP2004) – is time expired and its housing and spatial strategy policies have not been saved. However, AVDC is at an advanced stage of preparing a new Local Plan – the Submission Vale of Aylesbury Local Plan November 2017 (SVALP2017) - which will provide an up to date development strategy and strategic policies. SVALP2017 is currently at examination stage; the hearing sessions have been completed and proposed main modifications were subject to consultation during November and December 2019.
- 4.05 Until the SVALP is adopted, the AVDLP2004 constitutes the relevant development plan for those parts of the development within Buckinghamshire Council (formerly, AVDC). In September 2007 the Secretary of State issued a Direction, under Paragraph 1(3) of Schedule 8 to the Planning & Compulsory Purchase Act 2004, which identified those policies in AVDLP2004 that were ‘saved’ after 27th September 2007. It is only those saved policies which form part of the development plan. The Buckinghamshire Minerals and Waste Local Plan 2004-2016 (adopted April 2006) and the Buckinghamshire Minerals and Waste Core Strategy (adopted November 2012) also form part of the development plan, but are not relevant to the determination of this application since the Site is not affected by either of these plans, nor is it safeguarded for minerals or waste development.
- 4.06 In due course and once adopted, SVALP2017 will replace AVDLP2004. SVALP2017 contains a housing target based on meeting objectively assessed housing needs and unmet needs from neighbouring authorities and allocates strategic sites to meet the identified housing need. SVALP2017 is currently at examination stage and the Inspector has provided interim conclusions about the soundness of the document. AVDC have proposed main modifications. In accordance with Paragraph 48 of NPPF it is considered that SVALP2017 carries substantial weight in the decision on this Planning Application because the document has reached an

advanced stage in the plan-making process, is consistent with the NPPF and all objections have now been considered by the Inspector at examination and, in some instances resulted in main modifications which have themselves been subject to consultation.

- 4.07 Plan:MK is the relevant development plan for those parts of the development that fall within Milton Keynes. It is not the relevant development plan for those parts of the development that fall within Buckinghamshire Council, although it is a material consideration. The policies in Plan:MK which are relevant to the Proposed Development are referred to below.
- 4.08 There are other non-statutory policy documents which are relevant to the Proposed Development. These documents fall into three categories: those that have informed the supporting technical studies e.g. landscape and visual impact; those that have informed the design and layout and content of the Proposed Development e.g. sport and leisure facilities, and planning obligations; and, those that will guide the detailed design stage e.g. building materials, sustainable construction; and refuse and recycling facilities.

Approach

- 4.09 The Planning Application will need to be determined in accordance with the statutory provisions in s.70 Town and Country Planning Act 1990 and s.38(6) Planning and Compulsory Purchase Act 2004. This means it should be determined in accordance with the development plan unless material considerations indicate otherwise. In this case, as explained above, the adopted development plan relevant to the Planning Application is AVDLP2004.
- 4.10 The Proposed Development has been assessed against all relevant saved policies of AVDLP2004 and it complies with them. In summary, those relevant saved policies are as follows:
- Affordable Housing: Policy GP2;
 - Community and Recreation Facilities: Policies GP84, GP86, GP87, GP90 and GP91;
 - Grid Road: RA34 and RA35;
 - Design: GP35, GP38, GP39, GP40 and GP45;
 - Heritage: GP59; and
 - Transport: GP24.
- 4.11 As is demonstrated by the evidence supporting the Application, the Proposed Development accords with the relevant saved policies of AVDLP2004 read as a whole and in accordance with s.38(6) Planning and Compulsory Purchase Act 2004, planning permission should be granted unless material considerations indicate otherwise.
- 4.12 Paragraph 11 of the NPPF explains the operation of the presumption in favour of sustainable development. For decision-making, it means approving development proposals that accord with an up-to-date development plan without delay (paragraph 11(c)). Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date (where, for example, the local authority cannot demonstrate a five year supply of housing), planning permission should be granted unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF (paragraph 11(d)).
- 4.13 As set out above, while the ADVLP was intended to cover the period to 2011, a number of its policies have been saved and are considered to be up-to-date in light of their consistency with the NPPF. As such, it is considered that Paragraph 11(c) of the NPPF applies and planning permission should be granted on the basis that the Proposed Development accords with the up-to-date development plan policies, as identified in Paragraph 4.10 above

- 4.14 In the event that the AVDLP is not considered to be up-to-date, then paragraph 11(c) would arguably not apply, albeit the statutory presumption in favour of the development plan would still be engaged. If paragraph 11(c) does not apply, it would be necessary to consider whether paragraph 11(d) of the NPPF is engaged. The tilted balance in Paragraph 11(d) will be triggered by one of three possible circumstances: (i) where there are no relevant development plan policies, which is not the case here as a number of saved policies, including the affordable housing and design policies have been saved and are relevant to the Proposed Development; (ii) where the most important policies for determining the application are out of date, which is not the case here ; or (iii) where policies are deemed to be out of date because the Council lacks a five year housing land supply, which is not considered to be the case here. As explained above, it is considered that the Application should be allowed without delay on the basis of its compliance with the development plan. However, if it is decided that the most important policies of AVDLP2004 are out of date such that Paragraph 11(d) of the NPPF is engaged, then planning permission should still be granted for the Proposed Development because the adverse impacts would not significantly and demonstrably outweigh the benefits: indeed, the converse is true as the benefits significantly and demonstrably outweigh any adverse effects of the development.
- 4.15 In light of the compliance with the development plan, the starting point is that planning permission should be granted unless material considerations indicate otherwise. In this case, an important material consideration is the SVALP2017. The SVALP2017 also weighs in favour of granting permission. SVALP2017 contains a housing target based on meeting objectively assessed housing needs and unmet needs from neighbouring authorities and allocates strategic sites to meet the identified housing need. The Local Plan Inspector has provided interim conclusions about the soundness of SVALP2017 which do not raise any concerns over the proposed allocation of the Application Site. The allocation of the Application Site for a housing-led mixed use development (Ref. NLV001) was the subject of a site specific hearing session at the SVALP2017 examination. There are no outstanding concerns from the Inspector or BC about the soundness of Policy NLV001, and all indications are that the allocation will be found to be sound and adopted as part of the development plan. In accordance with Paragraph 48, Policy NLV001 should be given substantial weight in the decision for the Planning Application because it is close to adoption, is consistent with the NPPF and is not subject to outstanding, unresolved objections. Those proposed Main Modifications that relate to site allocation NLV001 are relatively minor and are associated with the detail of the Proposed Development e.g. delivery timetable, green infrastructure, noise, and flood mitigation and drainage, but do not affect the principle of the allocation or development at the site.

Site Specific Policies

- 4.16 The Application Site is not allocated for development in the adopted AVDLP2004 and it is not covered by any other site specific designations. The former development strategy in AVDLP2004 – which sought to focus development at Aylesbury – has not been saved. The Application Site would fall within the rural area. However, the strategy for the rural area in AVDLP2004 (not contained in policy) which is part of and set within the context of the overall development strategy must also be out of date. It is the general development control policies and the policies relating to the link road between the A4146 and A421 that have been saved and are relevant to the Proposed Development and these policies are considered to below.
- 4.17 The Proposed Development would in effect be an urban extension of Milton Keynes. It has been designed to be a standalone new neighbourhood based on the place-shaping principles identified in Policy SD15 of Plan:MK, which relates to sustainable urban extensions in neighbouring local authorities and includes measures to integrate developments with the existing urban area in terms of design and layout, transport routes and landscape. As explained in the updated Design & Access Statement and in the design and transport sections below, the Proposed Development would meet all of the principles identified in Policy SD15.
- 4.18 The Application Site is proposed for allocation as a mixed use sustainable urban extension in SVALP2017 – see Policy NLV001. Policy S2, as modified, defines the overall spatial strategy for SVALP2017, which includes

provision for 3,362 dwellings on land in the north east of Buckinghamshire i.e. adjacent to Milton Keynes within the former Aylesbury Vale, 1,855 of which would be delivered at the Application Site.

- 4.19 As set out above, there are no outstanding concerns from the Inspector or BC about the soundness of Policy NLV001 and no proposed Main Modifications affect the principle of the site's allocation. It is anticipated that Policy NVL001 will be retained and as such this policy should be given substantial weight in the decision on the Planning Application.

Sustainable Development

- 4.20 SVALP2017 has been subject to Sustainability Appraisal, which assessed the Application Site as part of the strategic allocation Policy NLV001 against sustainability objectives and against reasonable alternatives. The Application Site scored well against the sustainability objectives and when compared against reasonable alternatives, with no significant constraints identified that cannot be addressed through mitigation measures. There are no outstanding concerns from the Inspector about the strategic site allocation for Policy NLV001 or the assessment of the site in terms of sustainability. Policy S2 of SVALP2017 identifies the sustainable locations for growth to meet the identified development needs, including land adjacent to Milton Keynes and at the Application Site. The Inspector has no outstanding concerns about the locations for growth identified in Policy S2, although, as set out below, the Inspector has indicated that the housing target should be increased for soundness reasons which implies that existing strategic allocations need to be retained and additional locations for growth identified.
- 4.21 Paragraph 8 of the NPPF identifies the three strands of sustainable development; economic, social and environmental. The delivery of employment land and infrastructure, providing housing to meet current and future needs; and protecting and enhancing the environment are all sustainable development related matters that are relevant to this Application. The **Sustainability Strategy** and other application documents explain in further detail how the Proposed Development contributes to the three strands of sustainable development
- 4.22 The technical studies and the ES submitted with the Planning Application demonstrate that after mitigation measures have been implemented there are no unacceptable adverse impacts arising from the Proposed Development. In these circumstances, the proper application of the presumption in favour of sustainable development means that the Proposed Development should be granted planning permission. Furthermore, the Sustainability Strategy demonstrates that the Application Site is a sustainable location for development and the Proposed Development has all the attributes of sustainable development, by including landscape and biodiversity features, providing a mix of uses, additional housing and being accessible by walking, cycling and public transport.

Housing

- 4.23 The adopted AVDLP2004 has an end date of 2011. The housing target in AVDLP2004 was derived from Regional Planning Guidance for the South East (2001) and the Buckinghamshire County Structure Plan (1996), but these documents have not been saved and no longer form part of the development plan. Therefore, the housing targets in AVDLP2004 have also not been saved and no longer form part of the development plan. Policy S2 of SVALP2017 seeks to identify a housing target that would meet the housing needs of Aylesbury District for the period to 2033 and unmet needs from Wycombe District and Chiltern/South Buckinghamshire Districts. The Application Site is a strategic allocation adjacent to Milton Keynes, which is identified to contribute towards meeting the development needs specified in Policy S2 as modified. The housing target in Policy S2, as modified, is a total of 28,600 dwellings between 2013 and 2033. Table 1 in SVALP2017 explains how the housing target is distributed between the strategic and other settlements, with a total of 3,360 dwellings including 'commitments' of 2,212 dwellings in North East Aylesbury Vale; the Proposed Development is included within the 'commitments' figure.

- 4.24 Paragraph 59 of the NPPF reiterates the Government aim to boost the supply of housing and to achieve this by ensuring that a sufficient amount of land for housing is identified and brought forward. Paragraph 72 states that “the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities”.
- 4.25 The Proposed Development is required to meet the housing target in Policy S2 of SVALP2017. It represents an urban extension to Milton Keynes and is an appropriate way to deliver a significant amount of new housing to boost the overall supply. Policy H6 (as modified) of SVALP2017 requires larger developments to provide a mix of house types and sizes to meet local needs, and to include extra care units (see Policy H6b as modified). The housing mix has been discussed and agreed previously with AVDC’s Housing Officer. The Proposed Development will provide a mix of house types and sizes including 60 extra care units. It is anticipated that the housing mix will be discussed and agreed again with the Council. The detailed mix of dwellings will be determined at reserved matters stage.

Affordable Housing

- 4.26 Policy GP2 of AVDLP2004 sets out the proportion of affordable housing that will be required, which is that a minimum of 20% and up to 30% affordable housing should be provided for developments of 25 or more dwellings. AVDC’s Affordable Housing Interim Position Statement (November 2019) states that it expects to apply the requirements of Policy GP2 at 30% affordable housing.
- 4.27 Policy H1 of SVALP2017 seeks a minimum of 25% affordable housing from major development sites. It is anticipated that the type, size, tenure and location of the affordable housing will be agreed with the Council and that affordable dwellings should be integrated throughout a development site.
- 4.28 SVALP2017 as proposed to be modified identifies an overall need for 6,850 net affordable dwellings during the plan period, which equates to an average of 343 dwellings per annum. An **Affordable Housing Statement** is provided in **Appendix 5** which demonstrates that housing affordability is worsening in AVDC, but there has been a shortfall in the delivery of affordable housing against what is required.
- 4.29 The Proposed Development is for up to 1,855 mixed tenure dwellings, which provides scope for a range of affordable housing types to be provided on site. Subject to viability, up to 30% of the overall housing target would be affordable, which equates to up to 557 affordable dwellings, and would exceed the minimum policy requirement. The proportion of affordable housing to be provided within the overall development will be specified in the S106 Agreement but has been agreed in principle with AVDC.

Employment

- 4.30 Policy D5 of SVALP2017 anticipates that new employment land will mostly be provided within the existing employment areas and as part of the strategic allocations. The Application Site is identified as a location where a small amount of additional employment development would be delivered. The Proposed Development includes an employment area for B1 uses. It is appropriate to include small scale employment uses within the mix of uses provided at a sustainable urban extension. As demonstrated in the **Employment Assessment**, the employment provided within the Proposed Development would not divert jobs or businesses from the main industrial and employment areas, but would provide complementary commercial uses as part of a sustainable development.
- 4.31 Paragraph 80 of NPPF gives significant weight to the need to support economic growth. Milton Keynes is a key driver of the regional economy and a focus for employment and jobs, and development which supports

that economic role should be encouraged. The Proposed Development includes employment development and other uses that would generate employment opportunities.

Retail/Town Centre

- 4.32 Policy S1 of SVALP2017 expects new development to enable access to retail facilities. All of the proposed strategic residential allocations include a requirement for a neighbourhood/local centre with retail facilities to be provided within those developments. The allocation for the Application Site also expects retail facilities to be provided. The Proposed Development includes a neighbourhood centre providing retail and community facilities, which are located in an accessible location for the future residents of the Proposed Development. Paragraphs 86 to 90 of the NPPF set out the sequential and impact tests for retail, leisure and main town centre used that are neither in an existing centre, nor in accordance with an up-to date development plan.
- 4.33 The limited scale of convenience and comparison retailing included within the Proposed Development is planned and designed to principally meet the needs of its local residents, and these uses are anticipated within sustainable mixed use developments by Policy S1 and site allocation NLV001 of SVALP2017. The updated Retail Assessment considers the sequential and impact tests for the retail uses provided within the Proposed Development.
- 4.34 The updated Retail Assessment demonstrates that the neighbourhood centre is specifically planned and designed to meet the day-to-day needs of the local residential community and that it would be unsustainable for these uses to be located elsewhere. In addition, it is demonstrated in the updated Retail Assessment that the projected population of the Proposed Development will generate substantial residual retail (convenience and comparison) expenditure to support the turnover, vitality and viability of other centres and stores nearby, including in Bletchley and Milton Keynes, which is a significant positive impact..

Community & Recreation Facilities

- 4.35 Policy GP84 of AVDLP2004, Policy C4 of SVALP2017 and Paragraph 98 of NPPF seeks to protect existing public rights of way. Weasel Lane, an existing bridleway and cycle route, and other public rights of way across the site, including the Milton Keynes Boundary Walk. All will be retained and incorporated into the Proposed Development. The PROW Officer raised no objections previously to the Planning Application.
- 4.36 Policy GP86 of AVDLP2004 relates to the provision of outdoor playing space within development, with a standard of 2.43 hectares outdoor play space per 1000 persons, subject to existing open space provision in the locality. Policy GP87 expects equipped play areas for children to be provided and Policy GP91 expects informal amenity open spaces to be provided within development. Policy GP90 seeks to ensure that indoor sports facilities are provided, according to the need arising from the Proposed Development. SVALP2017 contains policies that deal with these matters. Policy I1 seeks to ensure that new green infrastructure is planned, delivered and managed as part of new development. Green infrastructure includes green corridors and public rights of way, public open space, formal sports areas and strategic landscaping. Policy I2 seeks to ensure that sufficient sport and recreation facilities are provided as part of new development.
- 4.37 Policy I3 and Policy S1 of SVALP2017 seek to ensure that new residential development provides community facilities to meet identified needs. The Glossary to SVALP2017 states that community facilities include community buildings, indoor and outdoor sports facilities and public open space including green infrastructure. All of the proposed strategic residential allocations include a requirement for community facilities to be provided within those developments and the allocation for the Application Site also expects a range of community facilities to be provided.

- 4.38 In addition, Paragraph 91 of NPPF expects development to facilitate social interaction and to create healthy and inclusive communities. These aims can be achieved by providing opportunities for future residents to meet, and by creating safe and accessible environments. Paragraph 92 seeks to ensure the delivery of community and recreational facilities and expects an integrated approach to be taken towards the location of housing, economic uses and community facilities. Paragraph 96 seeks to ensure that new development provides access to high quality open space, sport and recreation.
- 4.39 AVDC has an adopted Sport and Leisure Facilities SPG (August 2004), which sets out the requirements for such facilities in new development. A Companion Document: Ready Reckoner (August 2005) has also been adopted to identify which facilities a development needs to provide on-site; and sets out a basis to calculate the contribution for off-site community and leisure facilities. The Council intends to update the information in these documents once SVALP2017 has been adopted.
- 4.40 The Proposed Development includes a total of 53.97 Ha of green infrastructure and 1.18 Ha for allotments. It includes open space and recreation facilities within the Site, including formal sports pitches and children's play areas comprising two Neighbourhood Equipped Area of Play (NEAP) and eight Local Equipped Area of Play (LEAP). These facilities are located where they are easily accessible to future residents of the Proposed Development and existing residents from neighbouring areas.

Grid Road

- 4.41 Policy RA34 and RA35 of AVDLP2004 relate to the redevelopment of the Newton Longville Brickworks site and are of particular relevance to the Proposed Development. These policies safeguard a road corridor to the A4146 and protect a future road link to the A421 from development. There is a similar policy requirement for a link road in Policy SD8 of Plan:MK. Policy NLV001 of SVALP2017 identifies a requirement for land to be reserved for a grid road within the Proposed Development. Policy CT8 and Policy SD15 of Plan:MK seeks to extend the grid road network into neighbouring areas for cross-boundary developments.
- 4.42 The Proposed Development makes provision for a Grid Road reserve between A421 Buckingham Road / H8 Standing Way and the East West Rail line to enable the future provision of a link between A421 and A4146 Stoke Hammond bypass. The proposed Grid Road would require land and funding derived from the Proposed Development and Government funding for it to be delivered and implemented. It is noted that the Grid Road reserve was previously agreed by BCC Highways, and is included in the S106 Agreement.

Design

- 4.43 Policy GP35 of AVDLP2004 identifies the key factors to consider in the design of new development, which in summary are the physical characteristics, existing building styles, the scale and context, natural features, and visual impact. Policy GP38 expects new development to incorporate landscaping and to complement existing features. Policy GP39 expects existing trees and hedgerows to be protected or replaced as part of development proposals. Policy GP40 in particular seeks to retain trees and hedgerows which have amenity, landscape or wildlife value. Policy GP45 relates to secured by design considerations, and expects development to incorporate measures to assist crime prevention and help reduce risks to personal safety. Policy GP8 seeks to protect the amenity of future residents and to avoid unreasonable harm to nearby residents. The design and layout of the Proposed Development has the characteristics of the existing neighbouring residential areas. The landscape features and the existing trees and hedgerows have been incorporated into the Proposed Development. The landscaping at the site boundary will reduce the visual impact from neighbouring dwellings and residential areas and from surrounding villages, and the landscaping will protect residential amenity. The Proposed Development includes a green infrastructure framework which surrounds and permeates the developed area. Therefore, the Proposed Development is in accordance with the design policies of AVDLP2004.

- 4.44 Policy SD15 of Plan:MK identifies the place-shaping principles for sustainable urban extensions on the edge of Milton Keynes. The design and layout of the Proposed Development is strongly influenced by the principles that have governed the planned expansion of Milton Keynes, e.g. self-contained residential neighbourhoods surrounded by substantial areas of open space and strategic landscaping. The design of the Proposed Development seeks to respond to the characteristics (density, built form and open space) which define the built form of the residential areas located around or in close proximity to the Application Site, i.e. the traditional grid square of Tattenhoe, the neighbourhoods in the southern part of Newton Longville and the western neighbourhoods of Far Bletchley. It is noted that MKC's Urban Design Officer previously concluded that the Proposed Development would be an appropriate urban extension to Milton Keynes. Therefore, the Proposed Development is consistent with the place-shaping principles of Policy SD15 of Plan:MK.
- 4.45 AVDC and MKC have adopted a range of design related supplementary guidance. The Design Guide: Building Materials (AVDC January 1995) document provides details on the preferred materials for walls and roofs of new buildings. The Safety Through Design SPG (AVDC September 2001) sets out approaches for the planning and design of the external environment that can help reduce the likelihood of criminal and anti-social behaviour and allow people to feel safer. The Sustainable Construction Guide SPG (MKC April 2007) provides further detail on sustainable construction and identifies a range of measures to reduce the use of resources and materials. AVDC has produced a Refuse and Recycling: Advice Note for Developers (September 2012) identifies current arrangements for refuse and recycling collections and sets out what needs to be provided within development to facilitate those collections. All of these matters will be addressed at detailed design stage to deliver a sustainable and well-designed scheme.
- 4.46 Policy BE2 of SVALP2017 identifies the overarching design principles for new development. In summary, the design is expected to respect and complement the physical characteristics of the site and its surroundings, the local distinctiveness and vernacular character of the locality, the natural qualities and features of the area, and important public views and skylines. The Council intends to prepare supplementary guidance on the design of new development in support of Policy BE2 once SVALP2017 has been adopted. Policy BE4 sets out the approach toward densities, which are expected to reflect the densities in the surrounding areas and will be determined on a site-by-site basis. Policy BE3 seeks to protect residential amenity. The design and layout of the Proposed Development has the characteristics of the existing neighbouring residential areas. A variety of densities are applied across the Proposed Development, with lower densities at the more sensitive boundaries, and an average density which is consistent with other expansion areas of Milton Keynes. The Proposed Development includes substantial areas of landscaping and green infrastructure, which is a characteristic of the grid squares in Milton Keynes. The landscaping at the site boundary will reduce visual impact and protect the residential amenity of neighbouring areas. Therefore, the Proposed Development is in accordance with the design policies of SVALP2017.
- 4.47 Paragraph 124 of NPPF stresses the importance of design in built development. Paragraph 006 (Id. 26) of PPG provides further information on design in the planning process. It states:
- “Design impacts on how people interact with places. Although design is only part of the planning process it can affect a range of economic, social and environmental objectives beyond the requirement for good design in its own right. Planning policies and decisions should seek to ensure the physical environment supports these objectives. The following issues should be considered:*
- *local character (including landscape setting)*
 - *safe, connected and efficient streets*
 - *a network of greenspaces (including parks) and public places*
 - *crime prevention*
 - *security measures*

- *access and inclusion*
- *efficient use of natural resources*
- *cohesive & vibrant neighbourhoods”*

- 4.48 While the majority of the Proposed Development is within Buckinghamshire Council, it will be read as part of Milton Keynes. It would in effect be an urban extension which includes some of the characteristic features of the City, such as self-contained residential neighbourhoods surrounded by substantial areas of open space and strategic landscaping and it would connect to the existing grid road network. The Proposed Development has also been designed to be a standalone new neighbourhood with its own characteristics. The application is in outline but the submitted **Illustrative Masterplan** and **Design & Access Statement** clearly define future parameters of the Proposed Development to demonstrate that a high quality scheme will be delivered at detailed design stage.
- 4.49 The built development is surrounded by substantial areas of green infrastructure and multi-functional open space. The average density is 36 dwellings per hectare (dph), which is similar to and typical of other Milton Keynes expansion areas. Lower densities are proposed at the more sensitive boundaries and higher densities close to the primary routes and at the neighbourhood centre. The building heights are determined by their location within the site and the proposed use. The residential buildings are higher at key entrances or intersections to provide landmark or gateway buildings. The employment, neighbourhood centre and school buildings are the highest within the Proposed Development. The internal highway network will comprise primary and secondary routes, internal residential roads, footpath, bridleways, cycle paths. The Primary routes will connect each of the proposed residential parcels. The Secondary routes will provide connections through and between residential development parcels. The Proposed Development includes walking, cycling and public transport infrastructure and facilities, which would connect to the existing networks in the surrounding area thus providing future residents with the opportunity to travel by non-car modes of transport.
- 4.50 The potential amenity impacts on existing and future residents are assessed in the ES. A preliminary **Construction & Environmental Management Plan (CEMP)** has been submitted with the Planning Application, which explains how adverse impacts arising from the construction phase would be managed and controlled, including the impacts from noise and dust. At reserved matters stage, the design and layout of the proposed development and buildings will need to separate dwellings from main noise sources, avoid habitable rooms facing noise sources, and provide adequate noise attenuation measures within building facades and glazing. The detailed design and layout are issues that will be addressed at Reserved Matters stage. A buffer has been included within the Proposed Development to provide suitable stand-off distances between the proposed dwellings and the re-opened East West Rail line. Additional buffers will be required between the dwellings and the main roads to deliver a sustainable and well designed scheme.

Landscape

- 4.51 Policy GP35 of AVDLP2004 relates to design and is relevant to landscape, and expects development to respect and complement physical characteristics, natural qualities and features, and important public views and skylines. Policy NE5 of SVALP2017 seeks to maintain landscape character through careful design and layout, and where there will be harm to landscape character then mitigation measures will be required. Paragraph 170 of NPPF seeks to protect and enhance valued landscapes subject to their status. The Application Site is not specifically protected as an attractive or local landscape area.
- 4.52 A number of green infrastructure strategy documents have been prepared, which are relevant to the Proposed Development. The list of documents is as follows:
- Aylesbury Vale Green Infrastructure Strategy 2011-2016 (AVDC)
 - Buckinghamshire Green Infrastructure Strategy April 2009 (Buckinghamshire GI Consortium)

- Whaddon Chase Green Infrastructure Plan March 2010 (Buckinghamshire GI Consortium)
- Milton Keynes Green Infrastructure Plan February 2008 (MKC)

4.53 The landscape features and the existing trees and hedgerows have been incorporated into the Proposed Development, and the impact of the development on these features and landscape mitigation measures are explained in the **Landscape & Visual Chapter** in the ES. The majority of the Application Site is within a low sensitivity landscape character area which generally lacks intrinsic features of landscape merit. The Application Site lies adjacent to a character area of high sensitivity - part of the former hunting chase of Whaddon Chase – however, the green infrastructure and strategic landscaping on the western and southern boundaries will minimise adverse effects on this landscape. The landscaping at the site boundary will reduce the visual impact from neighbouring dwellings and residential areas and from surrounding villages. The Proposed Development would be completely contained within a very robust green infrastructure framework which surrounds and permeates the developed area. The green infrastructure would be multi-functional, encompassing woodland, meadows, open space, footpaths and bridleways, play areas, and sports pitches. AVDC’s Case Officer previously acknowledged that the substantial package of landscape measures included with the Proposed Development would provide mitigation for the landscape and visual impacts. The Application Site is not specifically protected as a valued landscape and the Proposed Development includes landscape mitigation measures to reduce the landscape and visual impacts, which is consistent with the approach in Policy GP35 of AVDLP2004, Policy NE5 of SVALP2017 and Paragraph 170 of NPPF.

Ecology

- 4.54 Policy NE2 of SVALP2017 seeks to protect and enhance biodiversity and the natural environment.
- 4.55 Paragraph 170 of NPPF seeks to retain the best and most versatile agricultural land. Footnote 53 to Paragraph 171 and Paragraph 026 (Id. 8) of the PPG states: “...Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality”. These matters are addressed in the **Agricultural Land Chapter** of the ES. The Application Site mostly comprises Grade 3b agricultural land, but there is a small area of Grade 3a land. The site is predominantly in arable use with a small area of pasture. The site is occupied by three farm businesses, one of which only operates on a part time basis. The Proposed Development would involve the loss of 16.2 Ha of the best and most versatile agricultural land, which is assessed in the ES as not significant. The two affected full time farm businesses will remain viable and able to operate off-site.
- 4.56 Paragraph 174 of NPPF seeks to enhance the natural and local environment, and to secure measurable net gains for biodiversity. Paragraph 175 seeks to conserve and enhance biodiversity, and expects development to avoid significant harmful impacts on habitats. Paragraph 016 (Id. 8) of the PPG explains how biodiversity should be taken into account in preparing a planning application. Ecological surveys are required to determine the impact of development on biodiversity. Paragraph 018 (Id. 8) identifies the issues that should be considered when seeking to avoid, mitigate or compensate for significant harm to biodiversity. Paragraph 019 (Id. 8) notes that green infrastructure can help to mitigate any significant harm to biodiversity. These matters are addressed in the Ecology Chapter of the updated ES. The Application Site contains woodland, hedgerows and mature trees, which will largely be retained within the Proposed Development. Parts of the Application Site are used by birds, bats, badgers, reptiles, and Great Crested Newts, all of which would be protected as part of the Proposed Development. A wide range of new habitats will be delivered as part of the Proposed Development, including woodland, hedgerows and trees. Mitigation measures will be secured by conditions and/or s.106 obligations; the need for an Ecological Mitigation, Enhancement & Management Plan is included within a draft condition. The Proposed Development would lead to some limited disruption to wildlife which is unavoidable. However, the scale and diversity of the green infrastructure proposals included within the Proposed Development will provide comprehensive mitigation, compensation and enhancement to compensate for any initial losses. It is noted that Natural England raised no objections to the Planning

Application previously. The Biodiversity Officer did not object previously either, but sought clarity on biodiversity net gains; these are now provided - see Chapter 7: Ecology in updated ES and ES Appendix 7.10. The Biodiversity Metric Calculation for the Proposed Development demonstrates a substantive net gain for biodiversity, which would be in accordance with Policy NE3 of Plan:MK, Policy NE1 of SVALP2017, and Paragraph 174 of NPPF.

Heritage

- 4.57 Statutory provisions in s.66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 require decision makers to have special regard to the desirability of preserving listed buildings and their settings and preserving or enhancing the character and appearance of Conservation Areas. Policy GP59 of AVDLP2004 expects development proposals affecting a site of archaeological importance to protect, enhance and preserve the historic interest and its setting. Policy BE1 of SVALP2017 seeks to preserve or enhance heritage assets.
- 4.58 Paragraph 192 of NPPF seeks to protect heritage assets in a manner which is appropriate to their significance. The term 'significance' in terms of heritage policy is defined in the Glossary to the NPPF as follows: *"The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting". Paragraph 003 (Id. 18a) of the PPG explains what is meant by the conservation and enhancement of the historic environment, and states that: "...Where changes are proposed, the National Planning Policy Framework sets out a clear framework for both plan-making and decision-taking to ensure that heritage assets are conserved, and where appropriate enhanced, in a manner that is consistent with their significance and thereby achieving sustainable development"*.
- 4.59 The **Archaeology & Cultural Heritage Chapter** of the ES assesses the impact of the Proposed Development on heritage assets. The Proposed Development will have no direct or indirect impacts on listed buildings. It will have a slight impact on views from the western edge of Newton Longville Conservation Area but this will have no material effect on the character and appearance of the Conservation Area and nor will there be any harm to the significance of any listed building. The historic landscape of the Application Site is essentially that of 19th century parliamentary enclosure which has subsequently suffered from significant hedgerow loss, and the Proposed Development will have a negligible impact upon this landscape type. The geophysical survey and evaluation trenching has identified two areas of late prehistoric/Roman settlement within the Application Site.
- 4.60 The Proposed Development avoids areas of known archaeological potential. The two areas of late prehistoric/Roman settlement are to be preserved within open space and school playing fields. An archaeological watching brief will be implemented to record any peripheral remains. BCC Archaeology raised no objection previously to the Planning Application.

Renewable Energy

- 4.61 Paragraph 153 of NPPF recognises the role of planning in delivering a low carbon future, and expects new development to comply with local requirements for decentralised energy supply and to minimise energy consumption by taking account of landform, layout, building orientation, massing and landscaping. Paragraph 97 seeks to increase the supply and use of renewable and low carbon energy. Paragraph 001 (Id. 5) of the PPG explains the importance of planning for renewable and low carbon energy. It states: *"Increasing the amount of energy from renewable and low carbon technologies will help to make sure the UK has a secure energy supply, reduce greenhouse gas emissions to slow down climate change and stimulate investment in new jobs and businesses. Planning has an important role in the delivery of new renewable and low carbon energy infrastructure in locations where the local environmental impact is acceptable."*

- 4.62 The updated **Energy Statement** has assessed the opportunities for energy efficiency and decentralised energy and renewable technologies. In summary those opportunities include the use of energy efficient building fabric, low energy lighting, natural ventilation, air source heat pumps, and photovoltaics. The Proposed Development will be required by regulation to achieve very high energy efficiency and CO2 standards.

Flooding & Drainage

- 4.63 Policy I4 in SVALP2017 relates to flooding and drainage. In summary, a site specific flood risk assessment is required because the Application Site is more than 1Ha in size and located in Flood Zone 1 and a sustainable drainage system should be provided in order to manage surface water run-off from the Proposed Development.
- 4.64 Paragraph 163 of NPPF expects new development to not increase flood risk elsewhere and for a flood risk assessment to be submitted where appropriate. Paragraph 165 expects major developments to incorporate sustainable drainage systems.
- 4.65 Paragraph 030 (Id. 7) of the PPG identifies the objectives of a flood risk assessment. It states:
“The objectives of a site-specific flood risk assessment are to establish:
- *whether a Proposed Development is likely to be affected by current or future flooding from any source;*
 - *whether it will increase flood risk elsewhere;*
 - *whether the measures proposed to deal with these effects and risks are appropriate;*
 - *the evidence for the local planning authority to apply (if necessary) the Sequential Test, and;*
 - *whether the development will be safe and pass the Exception Test, if applicable.”*
- 4.66 Paragraph 068 (Id. 7) of the PPG provides a checklist of matters to be addressed in a flood risk assessment. The updated **Flood Risk Assessment (FRA)** deals with these matters. The majority of the Application Site lies within Flood Zone 1 and therefore is at low risk of flooding. The north western corner of the Application Site is within Flood Zone 3 and as such is at high risk of flooding. However, the Environment Agency has no records of flooding at the site. All buildings will be located within Flood Zone 1. The Proposed Development will include sustainable drainage systems comprising rainwater harvesting and permeable paving, and attenuation basins will be included to attenuate surface water run-off to green field rates. It is noted that the Environment Agency, Anglian Water, BCC Flood Management and the Drainage Engineer raised no objection previously to the Planning Application.

Transport

- 4.67 Policy GP24 of AVDC2004 seeks to ensure that car parking is provided in accordance with the standards contained in the adopted Parking Guidelines SPG (May 2000). The maximum parking guidelines are contained in the table on pg.8 of the SPG and range from 1 space for a one bedroom flat to 3 spaces for a 4+ bedroom house. Paragraph 106 of NPPF has introduced a degree of flexibility to car parking standards, so that factors such as accessibility and availability of public transport for example are taken into account.
- 4.68 Policy T1 of SVALP2017 relates to the delivery of the sustainable transport vision and in particular seeks to encourage a modal shift to sustainable modes of transport, improve safety for all road users and ensure that new development does not create a significant negative impact on the highway or public transport network. Policy T2 seeks to ensure that development does not prejudice the implementation of existing and protected transport schemes, including East West Rail which is adjacent to the Application Site. Policy T3 confirms that AVDC support the proposed Oxford to Cambridge Expressway, and once a route has been confirmed it will be protected in a future review of the development plan. Policy T4 seeks to ensure that mitigation is provided to address transport impacts associated with development. It is expected that development will implement

necessary works to the highway, contribute towards local public transport services and support for community transport initiatives, provide new and improve existing pedestrian and cycle routes, and provide a travel plan to promote sustainable travel. Policy T5 expects development to provide appropriate levels of parking in accordance with standards, and that the design of development incorporates parking facilities for cyclists and low-emission vehicles. Policy T6 seeks to ensure that networks of pedestrian and cycle routes are provided within development, in order to enable easy access into and through new developments and to adjacent areas and to public transport services. Policy T7 expects electric vehicle charging points to be provided within larger development.

- 4.69 Policy SD15 of Plan:MK identifies the place-shaping principles for sustainable urban extensions on the edge of Milton Keynes. Criteria 6 of Policy SD15 requires the traffic impacts of any such urban extensions to be assessed, and Criteria 7 requires a route for any strategic link road through an urban extension to be protected. The traffic impacts of the Proposed Development have been assessed in the updated **Transport Assessment** (TA) and the Proposed Development makes provision for a Grid Road reserve within the Application Site.
- 4.70 In addition, transport related supplementary guidance has been adopted to assist developers. Buckinghamshire County Council (now Buckinghamshire Council) has produced a guide to assist those preparing travel plans. The Sustainable Travel Plans: Guidelines for Developers (updated 2012) document identifies thresholds for when a Travel Plan would be required and provides a recommended structure for a travel plan. A Travel Plan is required for residential developments of 80 dwellings or more and for all education facilities.
- 4.71 An updated **Framework Travel Plan** (FTP) has been submitted with the Planning Application, to cover all the proposed land uses and identifies a range of measures to positively influence travel patterns, discourage private car travel, and encourage the use of sustainable modes of transport.
- 4.72 Paragraph 108 of NPPF expects transport matters to be assessed for developments that generate a significant amount of movements. Paragraph 109 explains that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. An updated TA has been submitted with the Application to assess the traffic and transport related impacts of the Proposed Development. The TA recommends improvements to various junctions to mitigate the impacts of the Proposed Development, traffic calming in adjacent villages and a new bus service through the Application Site. A FTP has also been developed to effectively manage and promote walking, cycling and public transport strategies into and around the Application Site.
- 4.73 Paragraph 110 of NPPF encourages the use of sustainable modes of transport modes, including by giving priority to pedestrians and cyclists and improving access to public transport, and by creating safe and secure layouts. As set out in Paragraph 111, a Travel Plan is one method through which sustainable travel can be delivered. Paragraph 110b expects development to address the needs of people with disabilities and reduced mobility.
- 4.74 Paragraph 006 (Id. 42) of the PPG identifies the benefits of preparing a TA. It states:
- “Travel Plans, Transport Assessments and Statements can positively contribute to:*
- encouraging sustainable travel;
 - lessening traffic generation and its detrimental impacts;
 - reducing carbon emissions and climate impacts;
 - creating accessible, connected, inclusive communities;
 - improving health outcomes and quality of life;

- improving road safety; and
- reducing the need for new development to increase existing road capacity or provide new roads.”

They support national planning policy which sets out that planning should actively manage patterns of growth in order 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....”.

- 4.75 Sustrans Route 51 crosses the Application Site. The Route would be enhanced and incorporated within the Proposed Development. The Proposed Development incorporates walking, cycling and public transport infrastructure and facilities, which would connect to the existing networks in the surrounding area thus providing future residents with the opportunity to travel by non-car sustainable modes of transport. The Proposed Development would accommodate a mix of uses – residential, community, retail, employment and education – making it possible for future residents to travel within the development by sustainable modes. In all respects the Application Site represents a sustainable location for development.
- 4.76 The Proposed Development includes improvements to the existing highway network to provide the primary access points from B4034 Buckingham Road, A421 Standing Way and Whaddon Road and also identifies primary and secondary transport corridors. The local residential roads and access points would be determined at detailed design stage in the discharge of reserved matters. The proposed road hierarchy is described in the **Design & Access Statement**. Parking provision and traffic calming measures are matters that would also be addressed at detailed design stage.
- 4.77 The highway impacts of the Proposed Development have previously been subject to detailed discussion with BCC Highways, such that there was agreement on the package of mitigation measures and planning obligations required to address those impacts. It is anticipated that discussions will continue with Buckinghamshire Council to agree highway matters.

Noise

- 4.78 Policy NE6 of SVALP2017 seeks to ensure that development does not have an adverse impact through noise pollution. Paragraph 170e of NPPF seeks to prevent unacceptable risks from pollution; in this case both noise and air quality matters have been assessed. Paragraph 180 relates to the adverse impact of noise pollution. Section ID30 of the NPPG deals with noise matters and provides advice on how planning can manage potential noise impacts in new development. Paragraph 001 (Id. 30) of the PPG states that “Noise needs to be considered when new developments may create additional noise and when new developments would be sensitive to the prevailing acoustic environment”. Paragraph 005 (Id. 30) identifies the noise exposure hierarchy, which range from not noticeable where no specific action is required to noticeable and very disruptive where preventative action is required. Paragraph 008 (Id. 30) identifies a range of potential solutions to address noise impacts which are engineering, layout, use of conditions/obligations, and mitigation measures.
- 4.79 These matters are addressed in the **Noise & Vibration Chapter** of the ES. Noise from the Proposed Development would be generated by construction activities (ground preparation, excavation for foundations, construction of roads and buildings, off-loading of materials and vehicle movements), fixed plant equipment (in employment area, schools and neighbourhood centre), additional road traffic, and a reopened railway line. The existing and future residents are those that would be most affected by noise from the Proposed Development, unless mitigation measures are implemented. A preliminary **Construction & Environmental Management Plan** has been submitted with the Planning Application, which explains how adverse impacts arising from the construction phase would be managed and controlled, including the impacts from noise. The design and layout of the proposed development and buildings will need to separate dwellings from main noise sources, avoid habitable rooms facing noise sources and provide adequate noise attenuation measures within building

facades and glazing. A buffer will need to be included to provide suitable stand-off distances between the proposed dwellings and the main roads (Standing Way, Whaddon Road and Buckingham Road) and the re-opened East West Rail line. It is noted that the Environmental Health Officer raised no objection previously to the Planning Application in terms of potential noise impacts on residential amenity.

Air Quality

4.80 Policy NE6 of SVALP2017 seeks to ensure that development does not have an adverse impact on air quality. Paragraphs 180 and 181 of NPPF relate to the impact of development on air quality. Section Id. 32 of the PPG provides guidance on how planning can take account of the impact of new development on air quality. Paragraph 005 identifies the factors that could determine whether air quality is relevant to a planning decision. In summary those factors are as follows: significant changes in traffic generation; introducing new sources of air pollution; exposing new residents to existing sources of air pollutants; giving rise to potentially unacceptable impacts (such as dust) during construction; and, significantly affecting biodiversity at designated wildlife sites. Paragraph 008 identifies examples of air quality mitigation measures, which are as follows:

- *the design and layout of development to increase separation distances from sources of air pollution;*
- *using green infrastructure, in particular trees, to absorb dust and other pollutants;*
- *means of ventilation;*
- *promoting infrastructure to promote modes of transport with low impact on air quality;*
- *controlling dust and emissions from construction, operation and demolition; and*
- *contributing funding to measures, including those identified in air quality action plans and low emission strategies, designed to offset the impact on air quality arising from new development.”*

4.81 The **Air Quality Chapter** of the ES considers potential air quality impacts associated with the Proposed Development and the surrounding area. Air quality impacts from the Proposed Development would arise from dust associated with construction phase and increased traffic during construction and from the additional uses within the completed development. A preliminary **Construction & Environmental Management Plan** has been submitted with the Planning Application, which explains how adverse impacts arising from the construction phase would be managed and controlled, including the impacts from dust and on air quality. A Dust Management Plan would be prepared for each phase of the Proposed Development to specify the mitigation measures required to control dust. The assessment of air quality concludes that the Proposed Development will lead to an insignificant impact during the construction phase and a negligible impact during the operational phase.

Planning Obligations & Conditions

4.82 Policy I3 of SVALP2017 seeks to ensure that community facilities are provided in conjunction with development and conditions or planning obligations will be used to deliver new community facilities.

4.83 Buckinghamshire County Council (now Buckinghamshire Council) has adopted Guidance on Planning Obligations for Education Provision (June 2010), which sets out the approach for collecting planning obligations to meet the costs of additional education infrastructure requirements generated by new housing developments.

4.84 Paragraph 54 of the NPPF encourages the use of conditions or planning obligations to make development acceptable that would otherwise be unacceptable in planning terms. Paragraph 56 of the NPPF sets out the three tests that must all be met for planning obligations, which are as follows: necessary to make the development acceptable in planning terms; directly related to the development; and, fairly and reasonably related in scale and kind to the development. ID: 23b of the PPG provides further advice on when obligations should be used.

- 4.85 A draft S106 Agreement for the Planning Application is at an advanced stage. The Heads of Terms for the S106 Agreement for the Proposed Development are set out in Section 7.
- 4.86 Paragraph 55 of the NPPF deals with conditions. It states: *“Planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects...”*. ID 21a-004-20140306 of the NPPG explains how the six tests for conditions should be applied.
- 4.87 A series of suitable conditions have been discussed with AVDC, and are agreed subject to minor amendments. In summary, it is anticipated that conditions will be agreed for the following matters: reserved matters relating to design and layout, construction management, landscaping, tree protection, ecology, drainage and flooding, archaeology, sustainability, commercial uses, waste, transport, noise and contamination. The Applicant will continue to work with AVDC (now BC) and MKC to agree a final list of conditions.

Newton Longville Village Plan (2012)

- 4.88 In November 2012 the Newton Longville Village Plan was published. The document was prepared by a Steering Group comprising local residents. In summary, the document includes a review of services and facilities within the village, presents the findings of residents’ surveys and opinions on matters affecting the village, and identifies a series of actions for the future. The Village Plan is a non-statutory document.
- 4.89 The Village Plan includes comments on the previous larger Salden Chase application, the future expansion of Milton Keynes towards Newton Longville and traffic related issues in the village. These comments are considered to be out of date and not relevant to this current Planning Application, which is for a substantially smaller development.
- 4.90 The Parish Council is in the early stages of preparing a Neighbourhood Plan. A Neighbourhood Plan Area was approved in 2014. In 2016 the Parish Council assessed sites promoted through SVALP2017 in terms of their potential suitability for allocation in the Neighbourhood Plan. It is understood that discussions about the Neighbourhood Plan are ongoing, but a draft Plan has not yet been published for consultation. In due course, the Neighbourhood Plan will be subject to formal consultation before proceeding to a public examination and a referendum. Once made, the Neighbourhood Plan will form part of the statutory development plan.

Planning Policy Conclusion

- 4.91 AVDLP2004 constitutes the relevant development plan for those parts of the development within Buckinghamshire Council. The relevant saved policies of AVDLP2004 are as follows:
- Affordable Housing: Policy GP2;
 - Community and Recreation Facilities: Policies GP84, GP86, GP87, GP90 and GP91;
 - Grid Road: RA34 and RA35;
 - Design: GP35, GP38, GP39, GP40 and GP45;
 - Heritage: GP59; and
 - Transport: GP24.
- 4.92 It is considered that Paragraph 11(c) of the NPPF applies and planning permission should be granted on the basis that the Proposed Development accords with the up-to-date saved development plan policies in AVDLP2004.

- 4.93 Furthermore, the Application Site is included within the strategic site allocation Policy NLV001 in SVALP2017. Policy S2 of SVALP2017, as proposed to be modified, defines the overall spatial strategy for the local plan, which includes provision for 3,362 dwellings on land in the north east of Aylesbury Vale i.e. adjacent to Milton Keynes within Aylesbury Vale, most of which would be delivered at the Application Site. There are no outstanding concerns from the Inspector or AVDC about the soundness of Policy NLV001 in SVALP2017 and it is anticipated that it will be retained, and as such this policy should be given substantial weight in a decision on the Planning Application.
- 4.94 The technical studies and the ES submitted with the Planning Application demonstrate that after mitigation measures have been implemented there are no unacceptable adverse impacts arising from the Proposed Development.
- 4.95 The design and layout of the Proposed Development have been informed by the place-shaping principles for sustainable urban extensions on the edge of Milton Keynes as contained in Policy SD15 of Plan:MK. For example, the Proposed Development provides a self-contained residential neighbourhood surrounded by substantial areas of open space and strategic landscaping, land for a Grid Road reserve is provided, and the traffic impacts have been addressed through mitigation measures.
- 4.96 Policy T1 of SVALP2017 as modified and Policy CT1 of Plan:MK seek to improve public transport, provide more sustainable transport choices, encourage cycling and walking, and to direct development to locations that can be served by sustainable modes of transport. The Application Site is located adjacent to Milton Keynes. The Proposed Development includes walking, cycling and public transport infrastructure and facilities, which would connect to the existing networks in the surrounding area thus providing future residents with the opportunity to travel by non-car modes of transport. The Proposed Development would accommodate a mix of uses – residential, community, retail, employment and education making it possible for residents to travel within the development by sustainable modes. In all respects the Application Site represents a sustainable location for development.
- 4.97 The Proposed Development seeks to deliver the strategic allocation NLV001 for a mixed use sustainable urban extension. It represents a positive response to the core planning principles and housing policies of NPPF. The Proposed Development complies with the adopted and emerging affordable housing and transport policies. The design and layout of the Proposed Development complies with adopted and emerging design policies and national guidance on design, and has taken into account environmental and other site constraints and the relevant adopted policies dealing with these matters.

5.0 KEY BENEFITS

- 5.01 The assessment of the Proposed Development included within this Planning Statement demonstrates that that this Planning Application accords with national guidance and relevant development plan documents. In addition, the Proposed Development would deliver a number of key benefits.
- 5.02 The Proposed Development will, if approved, contribute to the three strands of sustainable development - social, environmental and economic - identified in Paragraph 8 of NPPF. The benefits of the Proposed Development are identified below.

Social Benefits

5.03 In summary the social benefits are as follows:

- Boost the supply of land for housing, and provide high quality market and affordable housing on the edge of Milton Keynes;
- Deliver up to 557 affordable dwellings, which equates to 30% of the total housing provision;
- Deliver 60 extra care dwellings;
- Generate additional funding from the New Homes Bonus;
- Generate additional Council Tax and Business Rates which would directly enhance the future finances of the local authority.
- Provide a wide range of community and recreation facilities, including a local park and district park, formal sports pitches, tennis courts, games area, a skateboard park, children's play areas, and allotments;
- Provide a neighbourhood centre with retail and community facilities; and
- Provide land and funding for a primary school and secondary school.

5.04 The housing that would be delivered at the Proposed Development will contribute towards the housing requirements identified in Policy S2 of SVALP207, and it is needed to maintain a sufficient housing land supply in AVDC. The delivery of affordable housing that exceeds minimum policy requirements is consistent with Policy GP2 of AVDLP2004. The delivery of additional community and recreation facilities would be consistent with Policies GP84, GP86, GP87, GP90 and GP91 of AVDLP2004.

Environmental Benefits

5.05 In summary the environmental benefits are as follows:

- Provide substantial areas of Green Infrastructure which include new habitats of native broadleaved woodland, species-rich grassland and wetland to enhance wildlife;
- Provide a substantive net gain for biodiversity of 116.26 units or +31.92% for habitats, and 4.5 units or +6.02% gain for hedgerows. – see Biodiversity Metric Calculation in ES **Appendix 7.10**.
- Provide additional strategic landscaping, woodland planting, green infrastructure and open space to enhance the surrounding landscape;
- Promote sustainable forms of transport by including walking, cycling and public transport infrastructure and facilities, which connect to the existing networks in the surrounding area;
- Develop a FTP to effectively manage and promote walking, cycling and public transport strategies in to and around the Site;
- Provide alternative transport opportunities to reduce the reliance on the private car which would have positive benefits for air quality;

- Contribute towards traffic calming in local villages, including Newton Longville, to discourage 'rat-running', reduce vehicle speeds and improve highway safety;
- Reserve land across the Application Site for a possible extension of the Grid Road network so that in the longer term, and subject to securing required funding, a connection can be made between A421 and A4146, which would assist in reassigning 'through' traffic (including HGVs) from local villages.

5.06 The substantial additional areas of green infrastructure provided within the Proposed Development, which would be in accordance with the design and landscape approach in Policies GP35, GP38 and GP39 of AVDLP2004. The net biodiversity gains delivered by the Proposed Development would be in accordance with Policy NE3 of Plan:MK, Policy NE1 of SVALP 2017 and Paragraph 174 of NPPF. The delivery of walking, cycling and public transport infrastructure and facilities would be consistent with the transport policies of Plan:MK and SVALP2017 and transport guidance in NPPF that seek to encourage the use of sustainable modes of transport. The inclusion of the Grid Road reserve within the Application Site is in accordance with Policies RA34 and RA35 of AVDLP2004 and Policy SD8 of Plan:MK.

Economic Benefits

5.07 The economic benefits of the Proposed Development are identified in the Employment Assessment and Chapter 13: Socio-Economics of the updated ES. In summary the economic benefits are as follows:

- Provide employment opportunities during the construction phase;
- Deliver employment opportunities at the employment area, neighbourhood centre, and schools;
- Provide employees for local businesses and services in Aylesbury Vale and Milton Keynes;
- Support local businesses, services and facilities through additional expenditure of future residents;
- Provide housing for employees of local businesses, services and facilities; and,
- Reduce commuting distances.

5.08 The delivery of employment land within the Proposed Development and the creation of additional jobs would be in accordance with Policy D5 of SVALP2017 and with Paragraph 80 of NPPF.

5.09 It is considered that overall the delivery of all these items through the Proposed Development would provide a substantial benefit to the local community and to Milton Keynes as a whole, which provides additional justification for the scheme.

5.10 The planning obligations that are required for the Proposed Development are identified in Section 7.

6.0 HOUSING SUPPLY AND DELIVERY

- 6.01 Paragraph 59 of NPPF seeks to significantly boost the supply of housing. To achieve this local planning authorities are required to identify a supply of deliverable sites to provide a five year housing land supply and a supply of developable sites for years 6 to 15.
- 6.02 As explained elsewhere in this Statement, the Application Site is a suitable location for development, it is allocated in the SVALP2017, and the Proposed Development is sustainable. In this Section the anticipated delivery timetable for the Proposed Development is identified. The initial phase of the Proposed Development is deliverable in the short term and the overall scheme is developable within the longer term.

Housing Supply

- 6.03 The Application Site is included within the latest housing trajectory for AVDC – see Appendix A of SVALP2017 (as modified October 2019) and Appendix D of Five Year Housing Land Supply Position Statement April 2019. At April 2019 AVDC was able to demonstrate a land supply of 5.64 years, with the supply including housing delivery from the Proposed Development. The Proposed Development is needed in order for AVDC to maintain a deliverable housing land supply. It is considered that if the Planning Application is not granted planning permission then AVDC would have only a marginal housing land supply position. As set out below, the Proposed Development is deliverable and can be delivered quickly, and therefore would provide essential support the current housing land supply position.

Housing Delivery

- 6.04 The expected timetable for the Proposed Development is as follows
- Planning Application submitted Q1 2015
 - Revision to Planning Application submitted Q2 2020
 - Outline Planning Permission granted Q3 2020
 - Reserved Matters approval (one year from outline permission) – Q3 2021
 - Start Date – 2021/22
 - Infrastructure delivery (two years from outline permission) – 2021/22
 - Housing delivery (nine years from reserved matters) – 2022/23 to 2030/31
 - Completion and final occupation – 2031
- 6.05 The estimated annual completion rates are set out in Table 6.1 below.

Table 6.1 Estimated Annual Completions

	Year 1 (2022/23)	Year 2 (2023/24)	Year 3 (2024/25)	Year 4 (2025/26)	Year 5 (2026/27)	Year 6 (2027/28)	Year 7 (2028/29)	Year 8 (2029/30)	Year 9 (2030/31)	Total
Estimated Annual Completions	100	200	250	250	250	250	250	250	55	1,855

- 6.06 The Proposed Development could deliver approximately 1,050 dwellings 2022/23-2026/2027.

- 6.07 The housing delivery timetable set out in Table 1 is broadly consistent with the delivery information provided in latest housing trajectories for AVDC – in SVALP2017 (as modified) and the Housing Five Year Housing Land Supply Position Statement April 2019, albeit a later start date is now assumed.
- 6.08 The SWMK Consortium comprises both developers and housebuilders, all of whom are experienced at delivering large scale mixed use developments of the type proposed in this planning application. The Application Site is either owned by members of the Consortium or is controlled under option. The fact that the Consortium comprises a number of housebuilders and the Proposed Development contains a number of development parcels indicates that there will be multiple housing outlets on site at the same time, which would increase housing delivery overall.
- 6.09 In conclusion, the Proposed Development is included within the latest housing trajectory and is identified as making a contribution towards the current five year housing land supply. The housing land supply position would be marginal without the Proposed Development, which is therefore both important and necessary in order to maintain a sufficient supply. The Proposed Development would fall within the definition of 'deliverable' as defined in the NPPF in that has a resolution from AVDC to grant planning permission, it is allocated in an emerging development plan (SVALP2017) which should be adopted this year, it is already controlled by housebuilders and developers, and it is viable. The initial phases of the Proposed Development are deliverable. The initial phases of the Proposed Development are deliverable within the current five year period. The Proposed Development is developable between years 2022/23 and 2030/31. The early delivery of the Proposed Development is a benefit to the housing land supply that should be given significant weight in the decision on the Planning Application.

7.0 S106 HEADS OF TERMS

- 7.01 The S106 Agreement for the Planning Application has been discussed with AVDC, Buckinghamshire County Council and MKC. The S106 Agreement includes transport and community infrastructure contributions for MKC. The Agreement document is at an advanced stage but has not yet been completed and signed.
- 7.02 In summary, the draft S106 Agreement identifies obligations for the following matters:
- Affordable Housing
 - Open Space
 - Drainage
 - Sports Facilities
 - Education
 - Health Facilities
 - Community Facilities
 - Employment Land and Local Centre
 - Transport and Highway Improvements
- 7.03 The Applicants intend to agree and finalise the S106 Agreement with Buckinghamshire Council and any other relevant parties as soon as possible.
- 7.04 The main obligations of the S106 Agreement relate to the following matters:
- 30% affordable housing, with 75% for affordable rent and 25% for shared ownership;
 - Public open space, structural landscaping, allotments and amenity land;
 - Play facilities including LEAPs, NEAPs, MUGAs, skate park and two youth shelters;
 - SuDS scheme;
 - Public transport and highway improvements;
 - Sports facilities and the sports pavilion;
 - Education facilities including land and funding for primary school and secondary school;
 - Health centre;
 - MK Hospital financial contribution;
 - Temporary and permanent community building;
 - Employment land; and
 - Neighbourhood centre.
- 7.05 These obligations would ensure that the Proposed Development is consistent with the relevant adopted development plan policies, including those relating to affordable housing and community and recreation facilities.
- 7.06 The transport obligations identified in the S106 Agreement relate to the following matters:
- A FTP for all of the proposed land uses;
 - Delivery of land to accommodate a Grid Road extension from V1 Snelshall Street;
 - A421 Corridor improvements;
 - Weasel Lane improvements across the Application Site;
 - Triggers for the delivery of highway works;

- Secure cycle parking within the Proposed Development and at other key locations, including Bletchley Station;
- Footpath 19 'on-site' improvements;
- Traffic calming on approach roads to Newton Longville;
- Highway safety scheme in Whaddon village;
- Public transport service improvements and provision of associated infrastructure; and
- Highway improvements on specific routes within Milton Keynes.

7.07 These transport obligations would ensure that the Proposed Development is consistent with the relevant transport policies and guidance.

7.08 Overall, the planning obligations contained in the S106 Agreement will make the Proposed Development acceptable in planning terms.

8.0 PLANNING BALANCE

- 8.01 S38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise.
- 8.02 The adopted development plan relevant to the Planning Application comprises the AVDLP2004, which was intended to cover the period to 2011. Some of its policies have been saved pursuant to a direction by the Secretary of State and it is those saved policies which now constitute the relevant development plan.
- 8.03 The Application Site is not allocated for development in the adopted AVDLP2004 and it is not covered by any other site specific designations. The Application Site would fall within the rural area. However, there are no saved policies relating to development within rural areas. In this context, it is only the general development control policies and the policies relating to the proposed link road between A4146 and A421 that have been saved and are relevant to the Proposed Development. As explained in Section 4 of this Planning Statement, the Proposed Development accords with all relevant saved policies of AVDLP2004, including affordable housing and transport policies, design policies, and environmental policies. Those relevant saved policies of AVDLP2004 are as follows:
- Affordable Housing: Policy GP2;
 - Community and Recreation Facilities: Policies GP84, GP86, GP87, GP90 and GP91;
 - Grid Road: RA34 and RA35;
 - Design: GP35, GP38, GP39, GP40 and GP45;
 - Heritage: GP59; and
 - Transport: GP24.
- 8.04 Therefore, it is concluded that the Proposed Development complies with the development plan, read as a whole, which means that there is a statutory presumption in favour of granting permission.
- 8.05 Plan:MK does not constitute part of the development plan for those parts of the Proposed Development that fall within Buckinghamshire Council, but as a recently adopted development plan for the adjoining area, it is a material consideration of significant weight. The Proposed Development complies with the relevant policies of Plan:MK, including those relating to design and layout, grid roads, and the place-shaping principles for sustainable urban extensions on the edge of Milton Keynes.
- 8.06 The Application Site is identified as a proposed allocation in SVALP2017 for a mixed use sustainable urban extension – Site Ref. NVL001: Land at South West Milton Keynes. In accordance with Paragraph 48 of the NPPF draft allocation Ref. NVL001 should be given substantial weight in the decision-making process for the Planning Application because VALP has reached an advanced stage of the plan-making process, is consistent with the NPPF and no modifications have been proposed to remove the proposed allocation of the Application Site. The Proposed Development also complies with other relevant emerging policies in SVALP2017, which in summary are as follows:
- Site Specific Policies: Policies S2 and NLV001;
 - Sustainable Development: Policy S2;
 - Housing: Policies S2 and H6;
 - Affordable Housing: Policy H1;
 - Employment: Policy D5;
 - Community and Recreation Facilities: Policies I3 and S1;
 - Grid Road: Policy NLV001;

- Design: Policies BE2, BE3 and BE4;
- Landscape: Policy NE5;
- Ecology; Policy NE2;
- Heritage: Policy BE1;
- Flooding and Drainage: Policy I4;
- Transport: Policies T1, T2, T3, T4, T5, T6 and T7;
- Noise: Policy NE6;
- Air Quality: Policy NE6; and,
- Planning Obligations and Conditions: Policy I3.

8.07 Therefore, it is concluded that the Proposed Development complies with the site specific and development control policies of SVALP2017, and this should be given substantial weight in the decision-making process for the Planning Application. Section 6 of this Planning Statement does highlight the deliverability of the Proposed Development and the contribution it would make to the housing land supply. Furthermore, the Application Site is included within the latest housing trajectory and housing land supply for AVDC and is needed to meet affordable housing needs provides additional weight in support of the Proposed Development.

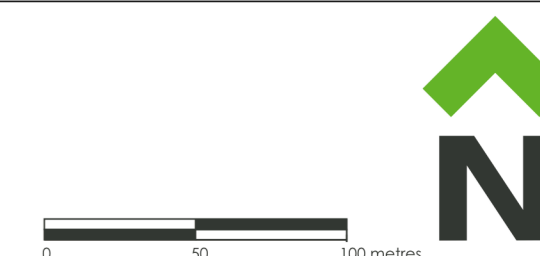
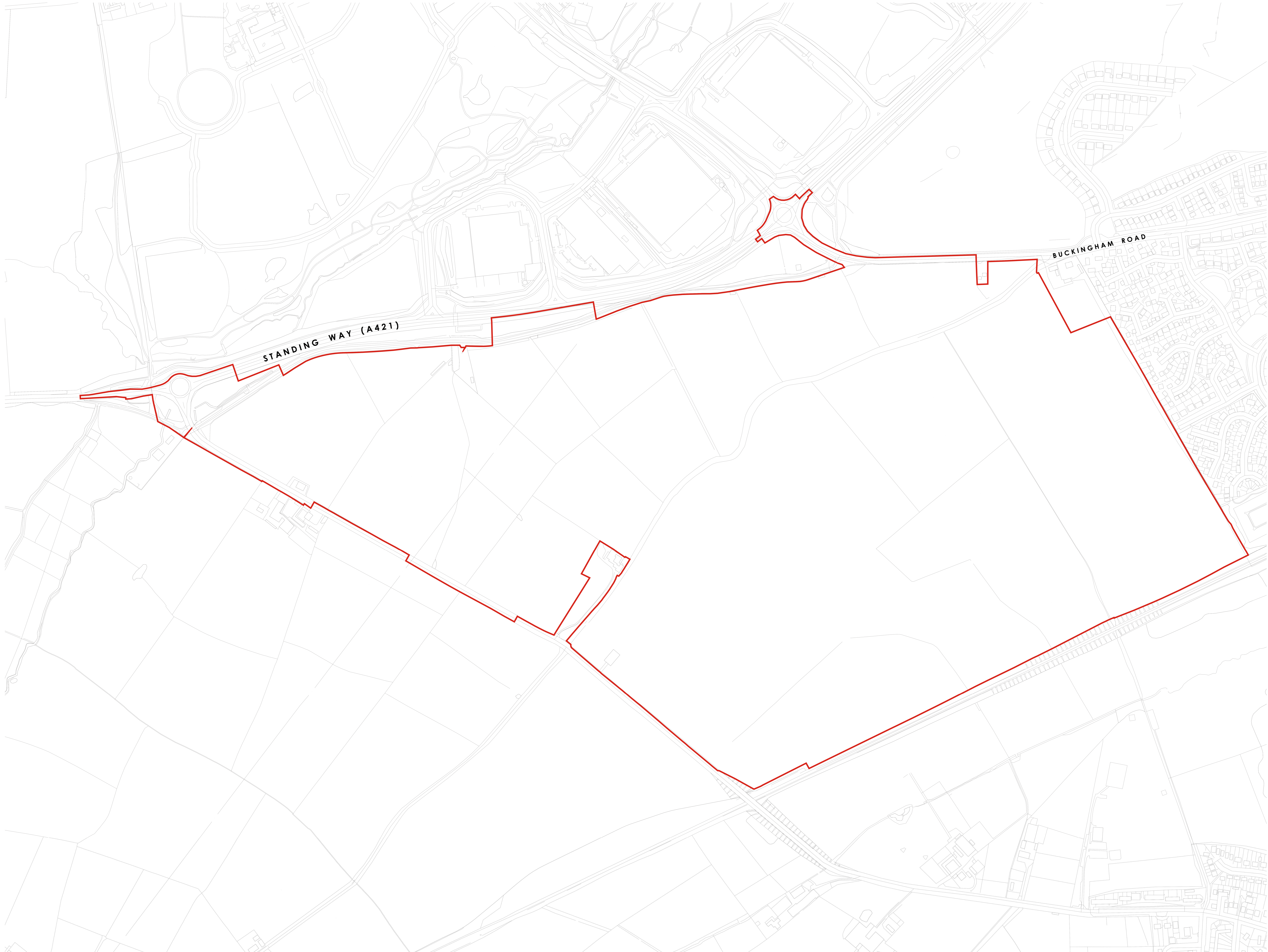
8.08 Taking into account the assessment of the Proposed Development against relevant policies in the adopted and emerging development plan documents, it is considered that the planning balance indicates clearly that planning permission should be granted in accordance with s.38(6) Planning and Compulsory Purchase Act 2004 and Paragraph 11(c) of the NPPF.

9.0 SUMMARY & CONCLUSION

- 9.01 The Proposed Development is a mixed-use sustainable urban extension to the south west of Milton Keynes, comprising up to 1,855 dwellings including 60 extra care housing units, employment area, neighbourhood centre including retail and community uses, primary school, secondary school, grid road reserve, multi-functional green space, sustainable drainage system, and associated access, drainage and public transport infrastructure. The Planning Application is submitted in outline with all matters reserved except for access. The Illustrative Masterplan, Development Framework Parameters Plan and Design & Access Statement submitted with the application clearly define the future parameters of the Proposed Development and demonstrate that a high quality scheme could be delivered at detailed design stage.
- 9.02 The Proposed Development will be read as part of Milton Keynes. It would include some of the characteristic features of the City, such as self-contained residential neighbourhoods surrounded by substantial areas of open space and strategic landscaping, and it would connect to the existing grid road network. The Proposed Development has been designed to be a standalone new neighbourhood with its own characteristics, and that design has been informed by the place-shaping principles for sustainable urban extensions on the edge of Milton Keynes as contained in Policy SD15 of Plan:MK.
- 9.03 The Proposed Development has been assessed against relevant saved policies in AVDLP2004 and it is concluded that it complies with them, including those relating to affordable housing, transport, design and the environment. Those relevant saved policies of AVDLP2004 are as follows:
- Affordable Housing: Policy GP2;
 - Community and Recreation Facilities: Policies GP84, GP86, GP87, GP90 and GP91;
 - Grid Road: RA34 and RA35;
 - Design: GP35, GP38, GP39, GP40 and GP45;
 - Heritage: GP59; and
 - Transport: GP24.
- 9.04 These policies have been saved and are considered to be up-to-date in light of their consistency with the NPPF. As such, it is considered that Paragraph 11(c) of the NPPF applies and planning permission should be granted on the basis that the Proposed Development accords with the up-to-date development plan policies,
- 9.05 The Application Site is allocated in SVALP2017 for a mixed use sustainable urban extension – Site Ref. NVL001: Land at South West Milton Keynes. In accordance with Paragraph 48 of NPPF draft allocation Ref. NVL001 should be given substantial weight in the decision for the Planning Application because SVALP2017 is consistent with the NPPF, has reached an advanced stage of the plan-making process and no modifications to delete that allocation have been proposed.
- 9.06 In addition, the Proposed Development would provide substantial social, environmental and economic benefits to the local community and to Milton Keynes as a whole, which provide additional justification for the scheme. For example, it would provide high quality market and affordable housing on the edge of Milton Keynes; up to 557 affordable dwellings; a wide range of new community and recreation facilities; land for new primary and secondary school; substantial areas of green infrastructure and strategic landscaping; walking, cycling and public transport infrastructure and facilities; traffic calming in Newton Longville and other local villages; reserve land for a Grid Road between A421 and A4146 which would assist in reassigning ‘through’ traffic (including HGVs) from local villages; and provide employment opportunities, including during the construction phase and within the proposed employment area, neighbourhood centre and schools.

9.07 In conclusion, the technical studies submitted with the Planning Application propose mitigation measures to address adverse impacts, and overall demonstrate that there are no constraints to development. The design and layout of the Proposed Development is well-designed and has taken into account the characteristics of the surrounding area. The Proposed Development remains consistent with adopted and emerging development plan policies and with national guidance. The planning balance indicates that planning permission should be granted for the Proposed Development in accordance with s.38(6) Planning and Compulsory Purchase Act 2004 and Paragraph 11(c) of the NPPF.

APPENDIX 1: APPLICATION SITE (DRAWING NO. CSA/4857/111)



Site Boundary: Approx. 144.85ha

STANDING WAY (A421)

BUCKINGHAM ROAD

Rev	Date	By	Description
A	16.04.20	JC	Project title update

CSA
environmental

Dives Bams, High Street,
Ashwell, Hertfordshire SG7 5NT

t 01462 745647
e ashwell@csaenvironmental.co.uk
w csaenvironmental.co.uk

Project Land at South West Milton Keynes

Title Site Location Plan

Client Taylor Wimpey UK Ltd, William Davis Ltd, Holam Land Management Ltd, Bellcross Homes and Capella Homes

Scale 1:2500 @ A0	Drawn SM
Date March 2020	Checked KR
Drawing No. CSA/4857/111	Rev A

APPENDIX 2: PLANNING APPLICATION DOCUMENTS LIST

SWMK Replacement Documents & Drawings

Original Application January 2015	Application Revision August 2016	Application Revision June 2020
Documents	Status	Status
Planning Statement & Appendices	Not superceded	Updated Planning Statement
Design & Access Statement	Addendum D&AS	Updated D&AS
Sustainability Strategy	Not superceded	Not superceded
Flood Risk Assessment	Not superceded	Updated Flood Risk Assessment
Retail Assessment	Not superceded	Updated Retail Assessment
Employment Assessment	Not superceded	Updated Employment Assessment
Statement of Community Involvement	Not superceded	Not superceded
Transport Assessment & Appendices & Framework Travel Plan	Updated TA & FTP	Updated TA & FTP
Arboricultural Impact Assessment	Not superceded	Updated AIA
Energy Strategy	Not superceded	Updated Energy Strategy
S106 draft Heads of Terms	Not superceded	Draft S106
Construction Environmental Management Plan	Not superceded	Updated CEMP
Environmental Statement & Appendices	Addendum to ES	Updated ES & Appendices
Environmental Statement Non-Technical Summary	Addendum to NTS	Updated Es NTS
	Ecological Assessment	Superceded by updated ES
	Revised LVIA (appendix to ES)	Superceded by updated ES

Original Application January 2015	Revision August 2016			Revision June 2020					
Drawings	Superceded by			Superceded by					
Development Framework Plan	SWMK03-073	H	09/14	SWMK03-073	L	08/16	CSA/4857/100	K	02/20
Parameter Plan	SWMK03-074	G	09/14	SWMK03-074	O	08/16	Withdrawn		
Open Space Plan	SWMK03-076	E	09/14	SWMK03-076	J	08/16	CSA/4857/113	C	03/20
Illustrative MP in Context	SWMK03-077	C	09/14	SWMK08-001	N/A	08/16	CSA/4857/112	E	03/20
Application Site Boundary	SWMK03-079	C	09/14	SWMK03-079	F	06/16	CSA/4857/111	A	03/20
Residential Density	SWMK03-082	C	09/14	SWMK03-082	F	07/16	CSA/4857/119	C	03/20
Public Transport	Not supplied			SWMK03-083	F	08/16	CSA/4857/117	C	03/20
Constraints Plan	SWMK03-087	D	11/14	Not superceded			Not superceded		
Phasing	SWMK03-131	B	09/14	Not superceded			CSA/4857/129	A	02/20
Ground Remodelling	SWMK03-148	A	09/14	SWMK03-148	C	08/16	Not superceded		
Building Heights	SWMK03-149	C	09/14	SWMK03-149	E	08/16	CSA/4857/114	C	03/20
Illustrative Landscape Plan	3126-L-01	C	09/14	3126-L-01	J	07/16	CSA/4857/105	E	03/20
Key Structural Elements	Not supplied			Not supplied			CSA/4857/120	F	03/20
Landscape Character Areas	Not supplied			Not supplied			CSA/4857/121	E	03/20

**APPENDIX 3: SUBMISSION VALE OF AYLESBURY LOCAL PLAN 2017 (AS
MODIFIED NOVEMBER 2019) – POLICY D- NVL001**

Salden Chase North East Aylesbury Vale

~~4.113~~4.110 In determining the housing figure for Aylesbury Vale, a crucial aspect of the Local Plan is to decide the strategic locations where development should be allocated. At the issues and options stages of the Local Plan two strategic allocations were considered on the edge of Milton Keynes/Bletchley.

~~4.114~~4.111 The Housing and Economic Land Availability Assessment (HELAA) v4 (January 2017) confirmed that the two strategic allocations known as Salden Chase (NLV001) and Shenley Park (WHA001) were both suitable or part suitable for housing and or economic development.

~~4.112~~ ~~As a result of further assessment and taking account of the overall housing requirement for Aylesbury Vale, Salden Chase and Shenley Park have~~s been identified as the most appropriate strategic allocations to come forward at this stage.

Salden Chase

~~4.115~~4.113 The site currently comprises agricultural land. There are hedgerows and trees at some of the field boundaries. There are agricultural buildings on the site. There are adjoining buildings that are in residential use.

~~4.116~~4.114 An oil pipeline crosses the middle of the site in a north-south direction; a 10m wide exclusion zone for the pipeline is incorporated into the layout of the proposed development. There are high voltage overhead power lines crossing the north-western part of the site; the power lines will be placed underground as part of the proposed development. An intermediate pressure gas main passes through the eastern part of the site in a north south direction; the gas main will fall within land set aside for the grid road reserve.

~~4.117~~4.115 The site is crossed by an existing public right of way in the form of a bridleway.

~~4.118~~4.116 The topography of the site includes a ridge towards the centre of the site with a gradual slope descending towards Newton Longville.

~~4.119~~4.117 There is a resolution to approve an outline planning application for the site – 15/00314/AOP – with all matters reserved except for access for a mixed-use sustainable urban extension on land to the south west of Milton Keynes to provide up to 1,855 mixed tenure dwellings; an employment area (B1); a neighbourhood centre including retail (A1/A2/A3/A4/A5), community (D1/D2) and residential (C3) uses; a primary and a secondary school; a grid road reserve; multi-functional green space; a sustainable drainage system; and associated access, drainage and public transport infrastructure.

~~4.120~~4.118 ~~A masterplan supplementary planning document (SPD) for the site will establish the site layout and disposition of land uses. The development will adhere to the following place shaping principles:~~

~~provide a long term defensible boundary to the western edge of Milton Keynes recognise that, whilst being located totally within Aylesbury Vale, the development will use some facilities in Milton Keynes, given its proximity. Milton Keynes also provides access point into the site
ensure the long term retention of Newton Longville and Whaddon as separate communities with unique identities, and protect them and other neighbouring communities, (including Mursley and Far Bletchley), from direct and indirect negative impacts generated by the development~~

be deliverable so as to maximise speed of delivery, enable faster delivery of key infrastructure whilst minimising disruption and delay
 provide a sustainable and strategic approach to flood mitigation and urban drainage, linked to multi-functional green infrastructure, to control surface water flows and flooding, (as set out in the Milton Keynes Strategic Flood Risk Assessment and Water Cycle Study)
 ensure green infrastructure and green open space is provided in the form of a liner park to the south of the site to minimise impacts to Howe Park Wood site of special scientific interest (SSSI) and that there are adequate green links to neighbouring Tattenhoe Park
 infrastructure will need to be provided and phased alongside development, the details of which will be agreed through developer contribution agreements.

4.121 The vision and objectives for this site are:

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
 To create a sustainable community providing a mix of uses to ensure that housing development is accompanied by employment, infrastructure services and facilities
 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
 To take account of the delivery of EWR instead and not compromising—safeguarding against noise etc.
 To ensure that infrastructure, facilities and services are delivered in the right place at the right time, for example, provision of new education facilities, and well planned and laid out local centres to establish the heart of new communities.
 To ensure that the deciduous woodland priority habitat the north of the site is retained and that green infrastructure is an integral part of the design
 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 at least 30% affordable housing ‘pepper potted’ throughout the site, and
 To be designed in a way to ensure that the new development relates to the wider site context including the relationship with Milton Keynes and Newton Longville and other surrounding villages.

D-NLV001 Salden Chase	
Site Ref:	NLV001
Site Name:	Salden Chase, Whaddon Road, Newton Longville
Size (hectares)	143.9ha
Phasing Expected time of delivery	1,500 homes to be delivered 2018-2023 and 1,755 homes to be delivered from 2023-2033
Allocated for (key development and land use requirements)	Resolution to approve - 15/00314/AOP – Outline planning application with all matters reserved except for access for a mixed use sustainable urban extension on land to the south west of Milton Keynes to provide up to 1,855 mixed tenure dwellings; an employment area (B1); a neighbourhood centre including retail (A1/A2/A3/A4/A5), community (D1/D2) and residential (C3) uses; a primary and a secondary school; a grid road reserve; multi-

functional green space; a sustainable drainage system; and associated access, drainage and public transport infrastructure.

Access into the site is a matter for consideration in this application and as submitted, there are three points of access proposed from the development onto the local highway network at the following locations: Whaddon Road, Buckingham Road and A421 Standing Way. Of these three access/egress points serving the site, Buckingham Road and A421 Standing Way are both within the control of Milton Keynes Council and Whaddon Road is within the control of Aylesbury Vale District Council.

Highway Improvements by Condition(s)

- Buckingham Road Access signalised gyratory including Stage 1 Road Safety Audit
- Whaddon Road Access speed limit reduction and further detailed design

Highway Improvements by s106 agreement(s)

- A421 Standing Way left in only junction and further detailed design
- Signalisation of the priority junctions of the A421/ Warren Road and A421/Shucklow Hill/Little Horwood Road.
- In order to mitigate the potential impact in Whaddon a financial contribution is required towards road safety improvements on Coddimoor Lane and Stock Lane
- Newton Longville Traffic Calming Proposals. Currently this is an indicative scheme which may include enhanced gateway features on all roads leading into the village and raised junction tables and signing/lining

Internal Road Layout

- [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.](#) A new network of primary streets will form the principal circulation route for all vehicular traffic including a bus route. The route will connect with the existing highway network at the three access points. Plans should show that the primary street is to be at least 7.3m wide, with a footway/cycleway of 3m wide and will need to consider drop off provision, widened footways, crossing points, road signage and lining to provide for a serviced school site

Grid Road

- Whilst the site only requires a single carriageway road for access, a dual carriageway could be provided in the future. The land for the grid road will need to be adequately secured in the S106 Agreement for the future extension of Snelshall Street (V1) so that AVDC/BCC can develop and

implement a scheme in the future

Public Transport Provision

- The enhancement of the existing bus service or provision of a new service to operate between the proposed development and Central Milton Keynes (CMK) via the existing rail station will be required and included within the Framework Travel Plan.

Public rights of way

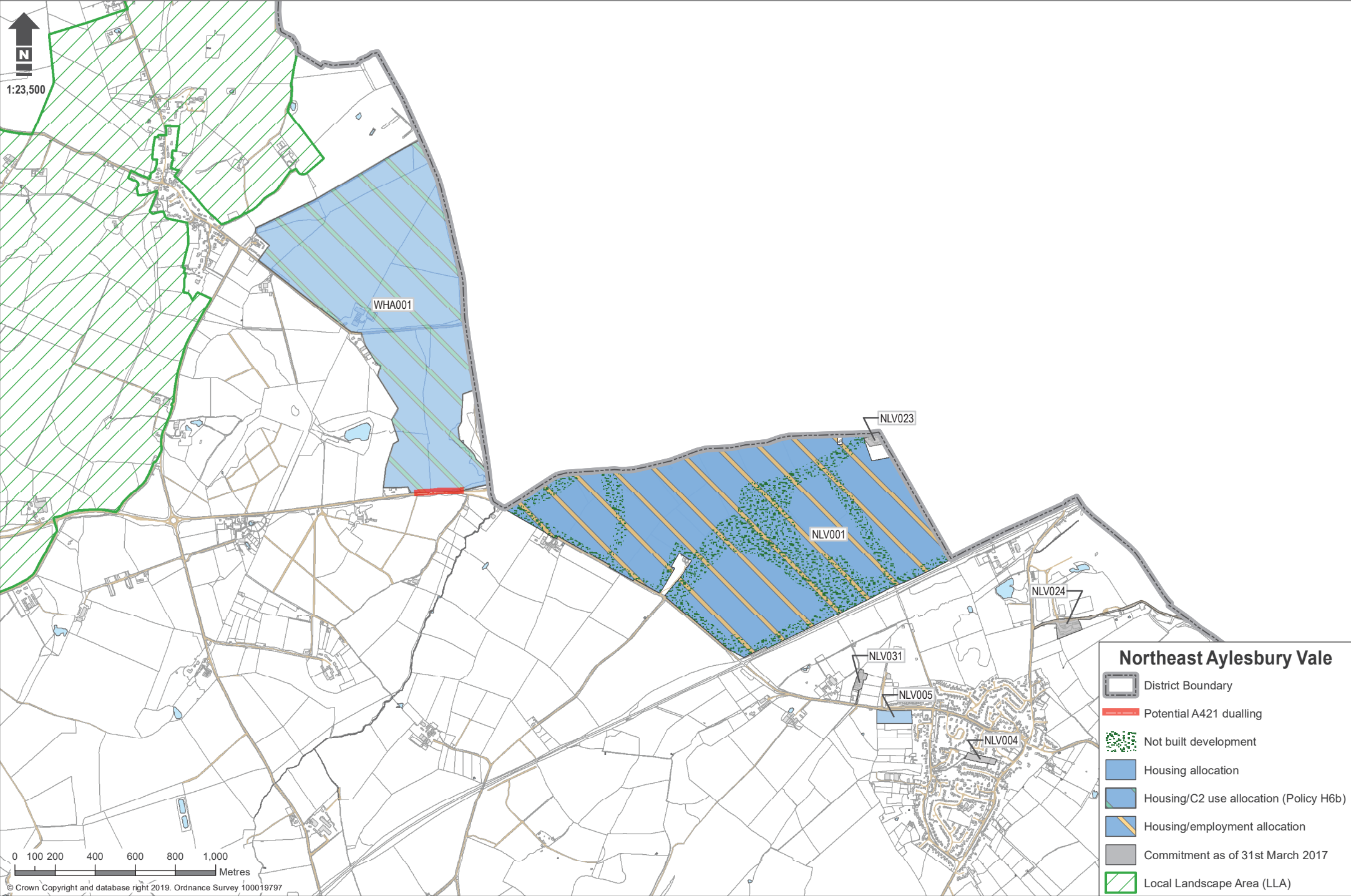
- A number of improvements to the surfacing of the local footpaths will be required within the site and be completed as part of the development and a financial contribution is to be secured as part of the Section 106 Agreement for those routes outside of the site. The improvements within the site include:
 - ensure a Redway compliant Grid Road reserve to link with existing PROW
 - upgrade of footpath and resurface between Weasel Lane and the railway underpass; route to be dedicated as a public bridleway
 - resurface byway in Newton Longville Parish and in Mursley Parish between Dagnall House Buckingham Road to the adopted highway
 - Provision should be made for adequate green links to Tattenhoe Park

Site-specific Requirements	Conserving and enhancing the natural environment In terms of the impact on the landscape, site proposals should use land efficiently and create a well-defined boundary <u>as the western edge of Milton Keynes</u> between the settlement and countryside, <u>ensuring that Newton Longville, Whaddon, Mursley and Far Bletchley remain separately identifiable.</u>
Landscape	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</u> 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 <u>including the protection of Newton Longville and Whaddon villages.</u>
Air Quality	An air quality assessment will be required and its content and conclusions accepted prior to construction phases.
Noise Contamination	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.
Conservation	The significance of any heritage assets affected including any contribution made by their setting will need to be considered. When considering the impact on the significance, great weight should be given to the asset's conservation. The protection and enhancement of sites of archaeological importance needs to be considered.
Ecology Biodiversity	Proposals will need to quantify ecological impacts in a meaningful way to enable pre and post development comparison, sufficient to objectively assess net losses or gains and to provide for multifunctional habitats. Proposals will need to minimise the impact on Howe Park Wood SSSI.
Trees and hedgerows	An aboricultural <u>aboricultural</u> survey has been undertaken for the site and has identified that trees of A and B category are to be retained and incorporated into any development. New structural and screen tree planting, hedge and shrub planting will be required as part of the future detailed scheme.
Place-Making Framework	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; and <u>and</u> highway and transport infrastructure and the <u>The</u> proposed distribution of uses across the site are set in the parameters plan.
Community facilities and Green Infrastructure	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>
<u>Flood mitigation</u>	<u>Provision of a sustainable and strategic flood mitigation and urban drainage scheme linked to multi functional Green Infrastructure must be provided.</u>
Education	The site will need to makes provision for a three-form entry primary school, with early years pre-school facilities on 3ha of land and a secondary school on 5.2ha of land. Provision is also made for

<p>Health Facilities</p> <p>Local Centre</p> <p>Employment Area</p>	<p>accessible recreation and community uses to serve the new residents, designed and located with the intention to be complementary to the delivery of the new schools.</p> <p>A contribution towards or delivery of a healthcare facilities either by way of site provision in an accessible location or direct funding to provide for a minimum 4GP with reserve to 6GP surgery will be required at reserved matters or detail stages.</p> <p>The site will need to make provision for a neighbourhood centre on 0.67ha of land to include retail (A1/A2/A3/A5 and A5) and community facilities (D1 and D2).</p> <p>The site will need to make provision for an employment area (B1) on 2.07ha of land.</p>
<p>Implementation Approach</p>	<p>An updated illustrated masterplan has been submitted in support of the planning application. The masterplan aims to encourage walking and cycling as realistic alternatives to that of the private car, through high quality infrastructure. The masterplan identifies 'alternative' Redway routes through the site which is considered a positive benefit and will need to be developed further as part of any future reserved matter applications.</p> <p>The details of the cycle and pedestrian infrastructure within the site and linking to Newton Longville, Bletchley and Central Milton Keynes will need to form and be considered as part of any future reserved matters application.</p>

**APPENDIX 4: SUBMISSION VALE OF AYLESBURY LOCAL PLAN 2017 (AS
MODIFIED NOVEMBER 2019) – PROPOSALS MAP EXTRACT FOR POLICY D-
NVL001**











1:23,500

0 100 200 400 600 800 1,000
Metres

© Crown Copyright and database right 2019. Ordnance Survey 100019797

Northeast Aylesbury Vale

-  District Boundary
-  Potential A421 dualling
-  Not built development
-  Housing allocation
-  Housing/C2 use allocation (Policy H6b)
-  Housing/employment allocation
-  Commitment as of 31st March 2017
-  Local Landscape Area (LLA)

APPENDIX 5: AFFORDABLE HOUSING STATEMENT (TETLOW KING)

Affordable Housing Statement

Land at SWMK

Affordable Housing Statement

Outline planning application with all matters reserved except for access for a mixed-use sustainable urban extension on land to the south west of Milton Keynes to provide up to 1,855 mixed tenure dwellings; an employment area (B1); a neighbourhood centre including retail (A1/A2/A3/A4/A5), community (D1/D2) and residential (C3) uses; a primary and a secondary school; a grid reserved; multi-functional green space; a sustainable drainage system; and associated access, drainage and public transport infrastructure

Land at SWMK

SWMK consortium

May 2020

LPA REF: 15/00314/AOP

OUR REF: M20/0403-01.RPT

TETLOW KING PLANNING
UNIT 2, ECLIPSE OFFICE PARK, HIGH STREET, STAPLE HILL, BRISTOL, BS16 5EL
Tel: 0117 9561916 Email: all@tetlow-king.co.uk

www.tetlow-king.co.uk

Contents

Section 1	Introduction	1
Section 2	The Development Plan and Related Policies	2
Section 3	Affordable Housing Needs and Past Delivery	8
Section 4	Affordability Indicators	12
Section 5	Conclusions	16

Introduction

Section 1

- 1.1 Tetlow King Planning are instructed by the SWMK consortium to examine the affordable housing sector within Buckinghamshire Council in relation to their proposed development on land at SWMK.
- 1.2 The proposed development is for up to 1,855 dwellings, of which 30% (up to 567 dwellings) are to be provided as affordable housing. This accords with the requirements of Aylesbury Vale Local Plan Policy GP2.
- 1.3 Providing a significant boost in the delivery of housing is a key priority of the Government's National Planning Policy Framework. Having a thriving active housing market that offers choice, flexibility and affordable housing is critical to our economic and social well-being.
- 1.4 Given the identified needs for affordable housing, the proposal is considered to provide significant community benefits which are a strong material consideration in favour of the development.
- 1.5 This statement comprises five sections:
 - Section 2 reviews relevant Development Plan policies and other material considerations relevant to the site;
 - Section 3 provides analysis of affordable housing needs and delivery performance;
 - Section 4 sets out a range of affordability indicators; and
 - Section 5 provides our conclusions.

The Development Plan and Related Policies

Section 2

Introduction

- 2.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, applications should be determined in accordance with the Development Plan unless material consideration indicate otherwise.
- 2.2 The Development Plan for Buckinghamshire Council comprises the Aylesbury Vale District Local Plan (2004), the Chiltern Local Plan (1997), the Chiltern Core Strategy (2011), the South Bucks Local Plan (1999), the South Bucks Core Strategy (2011), the Wycombe District Local Plan (2019) and the Wycombe Delivery and Site Allocations Plan (2013).
- 2.3 The Aylesbury Vale District Local Plan (2004) is the relevant Section 38(6) document within the Buckinghamshire Development Plan for this application.
- 2.4 Other material considerations include the Affordable Housing Interim Position Statement (November 2019), the Affordable Housing Supplementary Planning Document (2007), the NPPF (2019), the PPG and the emerging Vale of Aylesbury Local Plan 2013-2033.

The Development Plan

Aylesbury Vale District Local Plan (2004)

- 2.5 The Aylesbury Vale District Local Plan is the part of the wider Buckinghamshire Council Development Plan that is of particular relevance to the proposed site.
- 2.6 The Aylesbury Vale District Local Plan was adopted by the Council in January 2004 and sought to guide development until 2011. Under the transitional arrangements some of the policies were saved to provide ongoing local policy upon which to base planning decisions until such time that they are replaced by the relevant Development Plan Policies.
- 2.7 Chapter 1 sets out the main features of the Aylesbury Vale District Local Plan (AVDLP), which includes “*provision for affordable homes*”.

- 2.8 Paragraph 4.4 of the AVDLP notes that the Housing Needs Study undertaken for the Council in 1999 gave a strong indication that a considerable affordability problem may arise in the district from the relationship between local income levels and the supply of average and below average priced properties.
- 2.9 At paragraph 4.6 it recognises that as part of this study of housing need, the results of a large sample survey indicated that there were many ‘concealed households’ living as part of an existing household.
- 2.10 By way of context the plan reveals at paragraph 4.9 that the 1999 Housing Needs Study identified a need for 2,000 affordable units by 2006, equivalent to 286 affordable dwellings per annum, just to maintain the priority waiting list at its current level. It expressly acknowledges that *“this need for affordable dwellings is a material planning consideration”*. The housing need study has been superseded by Buckinghamshire Housing and Economic Development Needs Assessment Update (2017) and the requirement identified in the Emerging Vale of Aylesbury Local Plan 2013-2033.
- 2.11 The Council’s affordable housing requirements are detailed under Saved Policy GP2 as follows:
- “The Council will negotiate for the provision as affordable dwellings of a minimum of 20% and up to 30% of the total number of dwellings on developments of 25 or more dwellings, or sites of 1 hectare or more (or which form part of a site of such a size which is capable or development), regardless of the number of dwellings.*
- The Council will assess the circumstances of each proposed development individually. It will take into account in particular the need locally for affordable dwellings (including evidence from the Councils Housing Needs Survey), the economics of development (including the cost of any contributions towards the achievement of any other planning objectives also being sought from the development of the site), Government guidance and sustainability considerations.*
- The Council will wish to ensure that the affordable dwellings are occupied initially by ‘qualifying persons’ and are retained for successive ‘qualifying persons’.*
- 2.12 Saved Policy GP3 requires an additional 10% provision of local cost market housing.

Other Material Considerations

Affordable Housing Policy Interim Position Statement (November 2019)

- 2.13 The Interim Position Statement (IPS) sets out the Council’s approach to affordable housing requirements. It updates the previously published Affordable Housing Policy Interim Position Statement of June 2014 and follows changes introduced by the NPPF. It sets out the Council’s preferred approach for discussions on affordable housing.
- 2.14 The Council’s position at paragraph 3.1 of the IPS is based upon emerging policy in the Vale of Aylesbury Local Plan (Affordable Housing – Policies H1 and H2). In the intervening period prior to the adoption of the Vale of Aylesbury Local Plan (VALP) and the accompanying Affordable Housing SPD the approach is detailed at paragraph 3.2 as follows:
- *AVDLP Policy G2 remains the development plan policy basis for seeking the provision of affordable housing on site, unless off-site provision of a financial contribution of broadly equivalent value can be robustly justified through open book calculations and viability evidence. This will need to be verified by at least one independent consultant at the expense of the applicant.*
 - *AVDLP Policy GP3 (related to low cost market housing) is out of date and will not be given weight.*
 - *Therefore, the Council’s expectation for 30% affordable housing on schemes of 25 or more dwellings or site of one hectare or more as set out in AVDLP remains current.*
- 2.15 Paragraph 3.4 explains that on sites of 25 or more dwellings the Council will continue to apply the tenure split of 75% affordable rented and 25% shared ownership.
- 2.16 The IPS goes on at paragraph 3.6 to illustrate the Council’s preferred mix as shown in figure 2.1.

Figure 2.1: Preferred Affordable Housing Mix

House Type	Bedrooms	Affordable Housing Requirement
Flats	1 bedroom	9%
	2 bedrooms	6%
Houses	2 bedrooms	37%
	3 bedrooms	39%
	4 bedrooms	9%

Source: Affordable Housing Interim Position Statement (November 2019)

Emerging Vale of Aylesbury Local Plan 2013-2033

- 2.17 The emerging Vale of Aylesbury Local Plan (VALP) was subject to a Main Modifications consultation in December 2019 following Examination hearings in July 2018.
- 2.18 Chapter five deals with housing. Paragraph 5.4 explains that as a result of meeting housing need from adjacent councils which cannot meet their need in their own areas, Aylesbury Vale will also need to deliver a suitable proportion of affordable housing to address transferred affordable housing need within the overall unmet need.
- 2.19 At paragraph 5.5, the emerging Plan records that the Buckinghamshire Housing and Economic Development Needs Assessment (HEDNA) identifies an affordable housing need of 4,200 dwellings during the Plan period. It then goes on to explain that the Councils will seek 25% affordable housing from qualifying schemes and when allowing for 25% affordable housing on the entire housing figure for the Plan, “a total of 6,850 additional affordable homes must be provided in the district in the Plan period”.
- 2.20 Emerging Policy H1: Affordable Housing, is as follows:

H1: Affordable Housing

Residential developments of 11 or more dwellings gross or sites of 0.3ha or more will be required to provide a minimum of 25% affordable homes on site. In addition:

- a. The type, size, tenure and location of affordable housing will be agreed with the Council, taking account of the Council’s most up-to-date evidence on housing need and any available evidence regarding local market conditions.*
- 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 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*.*
- c. Exceptionally affordable housing provision may be provided off-site or a financial contribution made in lieu of such provision. This will need to be justified as an exception to normal policy as part of the planning application.*
- d. Where a site forms part of a larger site of a size which is capable of being developed, the affordable housing requirements will be applied on a cumulative basis.*
- e. The affordable homes will be expected to be integrated throughout the development site in accordance with the adopted Supplementary Planning Document.*

Further details regarding the implementation of this policy will be provided in the Affordable Housing Supplementary Planning Document.

**the independent consultant who will assess the financial appraisal will be chosen by the Council.*

Sustainable Community Strategy for Aylesbury Vale 2009-2026

- 2.21 The Sustainable Community Strategy (SCS) acknowledges that *“the lack of affordable housing means that families and communities may be separated”*.
- 2.22 It identifies a series of key challenges which includes the need to support communities, especially with affordable homes. The SCS has five broad themes, each of which has a series of key outcomes.
- 2.23 Amongst the key outcomes of the Health and Wellbeing theme is the aim to *“reduce homelessness”*.

Housing and Homelessness Strategy 2019-2022

- 2.24 The foreword by Councillor Mark Winn, Cabinet Member for Communities, makes clear that *“to have a secure and safe home is the bedrock of any modern society and the basis on which we can live and operate as individuals”*.
- 2.25 He goes on to explain that in order for the Vale to become a great place to live and work *“we must address our own homeless population”* and that *“it will not come as a surprise that the main focus of this strategy is weighted around prevention and securing affordable long term housing”*.
- 2.26 At paragraph 5.1.4 the Strategy sets out that households aspiring to a very modest semi-detached or detached house would need incomes of £64,103 and £93,671 respectively based on 3.5 times income multiples.
- 2.27 In addition to having a good income, households would also require an average deposit of 21% and be able to afford the associated legal and moving costs. It notes that whilst home ownership is the most popular form of tenure in the district *“Aylesbury Vale continues to be an expensive area in which to buy a home”*.
- 2.28 Paragraph 5.2 explains that the number of applicants accepted as unintentionally homeless and in priority need and therefore owed a homeless duty has risen 25% between 2013 and 2017 and 68% of these had dependent children.
- 2.29 The Strategy has four strategic priorities. Strategic Priority 2 is to continue to facilitate and maximise the supply of affordable housing which acknowledges that *“the demand for affordable homes is still growing and delivery remains challenging”*.
- 2.30 It identifies that *“scheme viability is often challenged on S106 sites, which in our district supply the majority of new homes”* with the outcome that *“this has resulted in reduced numbers of affordable housing on some sites”*.

- 2.31 The accompanying action plan at paragraph 9.2 recommends an increase in the supply of new affordable homes with the aim to develop the highest level of affordable homes possible in accordance with the relevant national and local planning policies.

Summary

- 2.32 The adopted Development Plan in Aylesbury Vale consists of the Saved Policies of the 2004 Aylesbury Vale District Local Plan which seeks a target of between 20% and 30% affordable housing across the district.
- 2.33 The emerging VALP proposes a 25% requirement for affordable housing provision from qualifying sites and identifies an overall need for additional 6,850 affordable homes over the 20 year Plan period, equivalent to 343 per annum on average.
- 2.34 This section clearly highlights that within adopted policy and a range of other plans and strategies, providing affordable housing has been long established as, and remains, a key priority for the Aylesbury Vale area of Buckinghamshire Council.

Affordable Housing Needs and Past Delivery

Section 3

Buckinghamshire Housing and Economic Development Needs Assessment Update (2017)

- 3.1 The HEDNA Update of September 2017 identifies a need for at least 4,200 affordable homes across the Plan period with an 83:17 tenure split in favour of affordable rented accommodation.

Emerging Vale of Aylesbury Local Plan 2013-2033

- 3.2 The Inspectors Interim Findings of 27 August 2018 set out at paragraph 18 that the uplift to address affordability issues in the VALP was too low.
- 3.3 At paragraph 20 the Inspector went on to explain that the LPEG Report to the Communities Secretary and to the Minister of Housing and Planning (March 2016) offered recommended systematic adjustments for market signals to replace the system of professional judgement used at other local plan examinations hitherto. They found that application of this methodology would set a 25% uplift for market signals in Aylesbury Vale.
- 3.4 Paragraph 26 of the Inspector's Interim Findings detailed their conclusions that there needs to be a higher uplift to the baseline housing need taking account of market signals and that this should be at least 20% and probably 25%.
- 3.5 ORS on behalf of the Council responded to the Inspectors Interim Findings in September 2018 challenging the 25% uplift figure.
- 3.6 On 2 December 2018 the Inspector provided a note in response to ORS's challenge to the 25% uplift figure and clarified that whilst the uplift is a matter for judgement he was content for the Council, in the first instance, to suggest an appropriate figure. However, he went on to say his view remained as stated in paragraph 26 of his Interim Findings.
- 3.7 In February 2019 ORS provided a further response to the Inspector where they proposed a 17% uplift at paragraph 59 as a midpoint between the 15% uplift and the

maximum of the Inspector’s range making a reasonable allowance for the ‘policy on’ element.

3.8 On 4 March 2019 the Inspector issued a response to the Council’s reply which explained that the work commissioned from ORS covered the ground he had asked to be covered and represented the most up to date expert analysis available so the Council should prepare modifications to the plan based on that advice.

3.9 Taking into account the findings of the HEDNA, the emerging Plan identifies an overall need for 6,850 net affordable homes over the 20 year Plan period, equivalent to 343 net per annum on average.

Past Delivery of Affordable Housing in Aylesbury Vale

3.10 Figure 3.1 below utilises data from the Council’s Housing Land Assessment reports and illustrates the past performance of housing and affordable housing in Aylesbury Vale in the period between 2008/09 and 2018/19. Across this period there has been a total of 3,638 gross affordable housing completions, equivalent to an annual average of 330 (gross).

Figure 3.1: Past Affordable Housing Delivery in Aylesbury Vale

Year	Total Number of New Homes Built (Gross)	Number of Affordable Homes Delivered (Gross)
2008/09	787	366
2009/10	834	423
2010/11	783	241
2011/12	1,137	439
2012/13	967	361
2013/14	1,018	253
2014/15	1,454	429
2015/16	1,241	227
2016/17	1,353	245
2017/18	1,459	324
2018/19	1,797	330
Totals	12,830	3,638

Source: Housing Land Assessments 2009 – 2019

3.11 Gross affordable housing completions fail to take account of any losses to stock through demolitions or sales through Right to Buy, Preserved Right to Buy or the Right to Acquire.

- 3.12 As such the figure of 3,638 affordable housing completions does not present the true picture as in reality the net figure is likely to be considerably lower as a result of losses to stock through demolitions and sales.
- 3.13 Although Right to Buy data is not available for the period after 2006/07 in Aylesbury Vale, in the period between its introduction in 1980 and 2006/7 some 6,481 affordable homes were lost from stock as a result of the Right to Buy, equivalent to an average of 249 every year.
- 3.14 At a national level almost two million households have exercised their Right to Buy since it was introduced in 1980. In July 2015 the Conservative Government published 'Fixing the Foundations: Creating a More Prosperous Nation' which confirms that the Government is committed to extending the Right to Buy to housing association tenants, noting that *"since the Right to Buy for council tenants was reinvigorated in the last Parliament, the number of sales has increased by nearly 320%"*.
- 3.15 The Government undertook a Voluntary Right to Buy pilot scheme with a limited number of RPs in a limited area in 2016/17. In the Government's Autumn Statement, the Chancellor Philip Hammond, outlined that there would be a large-scale regional pilot scheme of Right to Buy for housing association tenants in the West Midlands. In May 2018 the Government published guidance on the voluntary Right to Buy Midlands pilot although details of when the pilot scheme will be launched remain unavailable. In September 2019, the housing secretary Mr Robert Jenrick, introduced new plans for housing association tenants to have the right to purchase a share in the equity of their property.
- 3.16 The extension of Right to Buy to Housing Association tenants is likely to further increase the loss of existing affordable housing stock, putting increasing pressure on the need to deliver more affordable homes in Buckinghamshire Council's administrative area in the future.

Comparative Analysis of Delivery Against the Emerging Plan Target

- 3.17 The HEDNA sets a base date of 2013. The emerging Plan takes into account the findings of the HEDNA and identifies an overall need for 6,850 net affordable homes over the 20 year Plan period, equivalent to 343 net per annum on average.
- 3.18 Comparative analysis of gross completions since 2013 show that a shortfall of -250 affordable homes has already arisen as illustrated by figure 3.2 below utilising data taken from the Council's own Housing Land Assessment monitoring reports.

Figure 3.2: Affordable Housing Delivery Compared to Emerging Plan Target

Year	Emerging Plan Affordable Housing Target (Net)	Number of Affordable Homes Delivered (Gross)	Difference
2013/14	343	253	-90
2014/15	343	429	+86
2015/16	343	227	-116
2016/17	343	245	-98
2017/18	343	324	-19
2018/19	343	330	-13
Totals	2,058	1,808	-250

Source: Housing Land Assessments 2014 – 2019; Emerging VALP

- 3.19 It is important to note however that this is not a like for like comparison as the Emerging Plan identifies a net requirement and the Council only records gross affordable housing completions. As such the actual shortfall in delivery against the plan target is likely to be considerably higher than that set out in figure 3.2.

Conclusions on Affordable Housing Needs and Past Delivery

- 3.20 There is an acute need for affordable homes in Aylesbury Vale, and Buckinghamshire Council, with the emerging VALP identifying a need for at least 343 net affordable homes per annum between 2013 and 2033.
- 3.21 There has been a shortfall in delivery against this target of -250 affordable homes in the space of six years, which is based upon gross completions fails to take account of losses to stock. In reality the shortfall is likely to be considerably higher once demolitions and Right to Buy, Preserved Right to Buy and Right to Acquire sales are taken into account.
- 3.22 In light of the identified level of need there can be no doubt that the delivery of affordable housing on the proposed site will make an important contribution to the affordable housing needs of Aylesbury Vale, and Buckinghamshire Council.

Affordability Indicators

Section 4

Market Signals

- 4.1 The PPG recognises the importance of giving due consideration to market signals as part of understanding affordability in the context of Plan making.

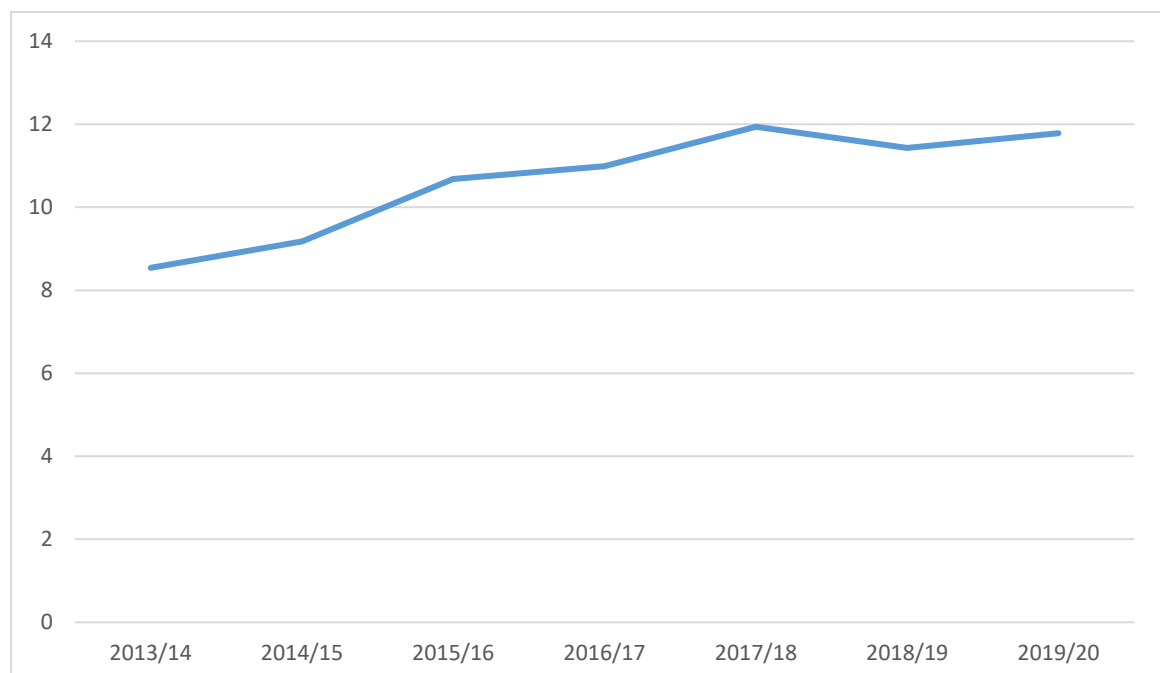
Average Affordability Ratio

- 4.2 The National Housing Federation (NHF) Home Truths report shows that in the period between 2013/14 and 2017/18 the average house price to average income ratio within the district increased from 9.1 to 11.3 which represents a 24% increase.

Lower Quartile Affordability Ratio

- 4.3 For those seeking a lower quartile priced property (typically considered to be the 'more affordable' segment of the housing market), the situation is even worse. The lower quartile house price to incomes ratio in Aylesbury Vale has increased by 34% from 8.54 in 2013/14 to 11.78 in 2019/20 as illustrated by figure 4.1 below.

Figure 4.1: Lower Quartile House Price to Income Ratio

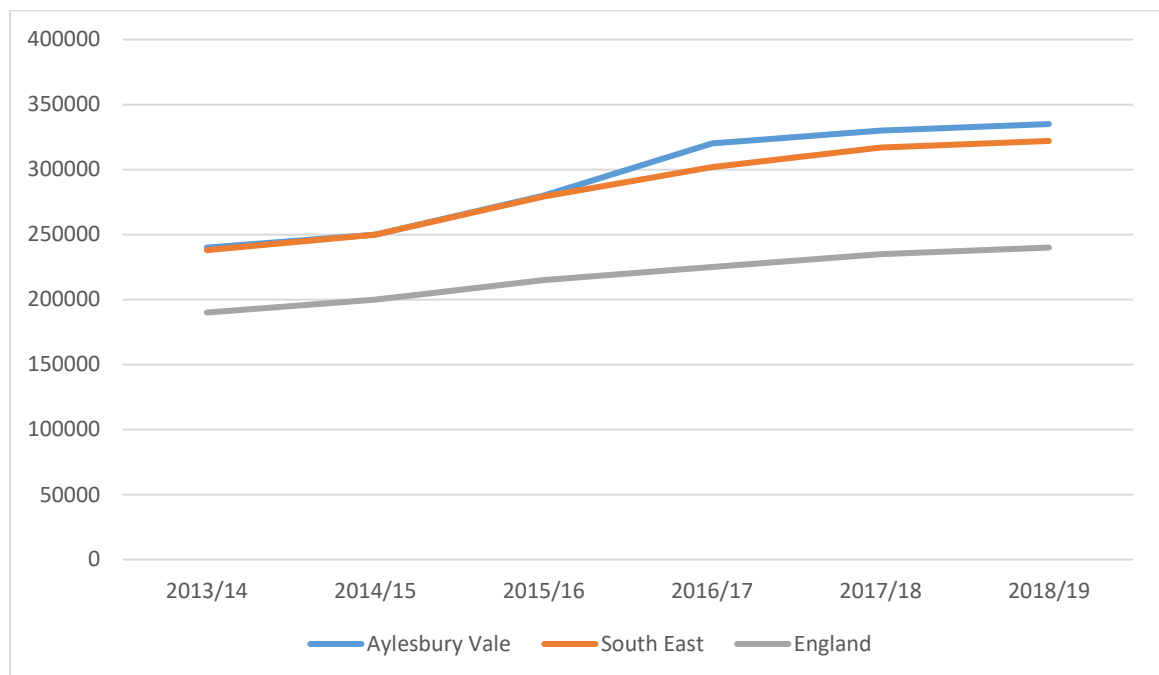


Source: ONS – Ratio of lower quartile house prices to lower quartile gross annual workplace-based earnings, Table 6c

House Prices

- 4.4 Over the period between 2013/14 and 2017/18 the NHF report an average house price increase of 34%, rising from £272,820 to £366,578, this has resulted in the income required to purchase an average priced home in the district with an 80% mortgage rising from £62,359 to £83,789 in the space of just five years.
- 4.5 By way of comparison, average earnings in the district saw an increase of just 9% from £29,947 to £32,500 over the same period.
- 4.6 Median house price data shows that in Aylesbury Vale prices consistently exceed both the national and regional average with a 40% increase within the district since 2013/14 compared to 35% regionally and 26% nationally as shown at figure 4.2 below.

Figure 4.2: Median House Prices



Source: HPSSA Dataset 9

Private Rental Market

- 4.7 The picture for renters in Aylesbury Vale is not much better with the NHF reporting that average monthly rents increased 14% from £790 pcm to £903 pcm between 2013/14 and 2017/18.
- 4.8 Valuation Office data indicates that in Aylesbury Vale average private rents increased by 16% between 2013/14 and 2018/19 from £790 pcm to £918 pcm, outstripping the regional average of 13%.

4.9 The situation is even worse in the lower quartile private rental sector where VOA data indicates that rents have increased by 26% over the same period from £595 pcm to £750 pcm, which is double the national rate of increase of 13% and more than four times the regional rate of increase of 6%

Homelessness

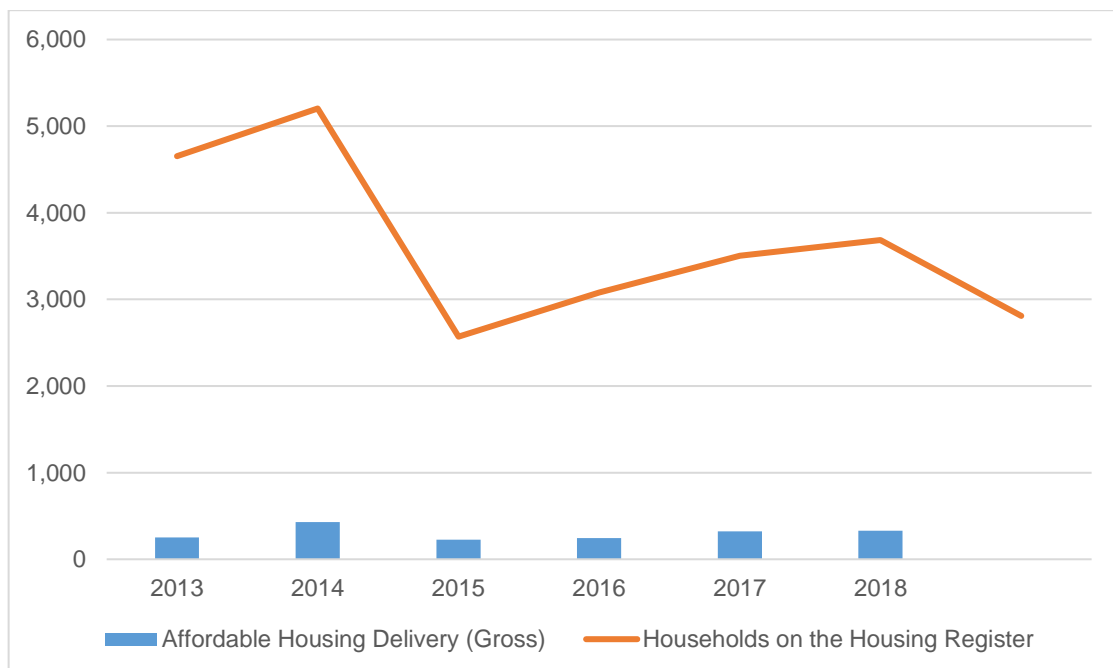
4.10 Contrary to a decrease in percentage terms in homelessness both nationally (down 48%) and regionally (down 20%) between 2013/14 and 2018/19, within Aylesbury Vale there has been a 5% increase in homelessness over the same period.

4.11 The increasing house prices, private rents and failure of affordable housing delivery to keep pace with identified demand will have all played a role in this starkly different picture within the district compared to the region and national position.

Housing Register

4.12 At 1 April 2019 there were a total of 2,808 households on the Council’s Housing Register. Figure 4.3 below provides a comparative analysis of the number of households on the Register and gross affordable housing delivery over the period since 2013/14.

Figure 4.3: Comparative Analysis of the Housing Register and Gross Affordable Housing Delivery



Source: *Housing Land Assessments 2014 – 2019; CLG Live Table 600*

- 4.13 This demonstrates that affordable housing delivery has persistently fallen substantially short of meeting identified housing needs.

Conclusions on Affordability Indicators

- 4.14 Affordability in the district has been and continues to be, a critical concern. House prices and rent levels in both the average and lower quartile segments of the market are increasing whilst at the same time the stock of affordable homes is failing to keep pace with the level of demand. This only serves to push buying or renting in Aylesbury Vale out of the reach of more and more people.
- 4.15 Analysis of market signals is necessary in understanding the affordability of housing. It is clear that there is an acute housing problem in Aylesbury Vale, with an average house price to average income ratio of 11.3 and a lower quartile house price to lower quartile income ratio of 11.78.
- 4.16 Market signals indicate a worsening trend in affordability in Aylesbury Vale and by any measure of affordability, this is a district in the midst of an affordable housing crisis, and one through which urgent action must be taken to deliver more affordable homes. The Local Plan Inspector specifically identified affordability as an issue and through correspondence with the council ensured that an uplift to the housing requirement was adjusted to take account of market signals. Taking into account the findings of the HEDNA, the emerging Plan identifies an overall need for 6,850 net affordable homes over the 20 year Plan period, equivalent to 343 net per annum on average.

Conclusions

Section 5

- 5.1 The provision of affordable housing is a key part of the planning system. A community's need for affordable housing was first enshrined as a material consideration in PPG3 in 1992 and has continued to play an important role in subsequent national planning policy, including the National Planning Policy Framework.
- 5.2 Saved Local Plan Policy GP2 requires the provision of 20-30% affordable housing on qualifying sites, whilst the Council's 2019 Affordable Housing Policy Interim Position Statement seeks 30% affordable provision. The proposed development is compliant in both respects.
- 5.3 There is a range of evidence demonstrating the needs for affordable housing in the district, as a result of which the emerging VALP identifies a target of 343 net affordable homes per annum between 2013 and 2033.
- 5.4 In the period since 2013 a shortfall of -250 affordable homes has arisen against the emerging VALP target. Critically, this is based upon comparing gross affordable housing completions (as this is all the Council records) against a net target, as such if losses to stock through demolitions and Right to Buy, Preserved Right to Buy and Right to Acquire sales were taken into account then the shortfall is likely to be considerably larger.
- 5.5 A wide array of signals indicates that there is a worsening trend in affordability in Aylesbury Vale. There can be little doubt that this is a district in the midst of an affordable housing crisis, the remedy to which must be to deliver more affordable homes.
- 5.6 The proposal to deliver up to 567 affordable dwellings would make a substantial contribution to the delivery of affordable housing in the district and towards meeting the acute affordable needs of the Aylesbury Vale.
- 5.7 A community's need for affordable housing is integral to the social dimension of the golden thread of sustainable development running through the NPPF. It is highly unlikely that the backlog of need will be met in the foreseeable future. The affordable housing offered should be given very significant weight in the determination of this appeal.